



## **Modern Slavery and Human Trafficking Statement**

### **Introduction**

BCM continues to recognise its responsibility to address and mitigate the risk of modern slavery and human trafficking in its operations. This statement sets out our commitment and actions taken to do our part to eradicate these abhorrent practices, as well as meet the requirements of the UK Modern Slavery Act 2015.

### **Structures and Supply Chains**

BCM is part of Fareva, one of the world's leading subcontractors in the Industrial and Household, Cosmetics and Pharmaceuticals fields. Fareva is a worldwide, independent and family group with a turnover of 1.65 billion euros in 2018. Fareva operates over 40 production sites and employs over 12,000 employees across 3 continents and 11 countries around the world.

BCM has over 100 years' experience of manufacturing health and beauty products, producing products that are sold around the world. BCM offers a range of solutions to suit our customers' needs and requirements - this includes a full service offering and delivering a client brief from the product concept through to testing, manufacturing and packing. BCM employees approximately 730 employees and turnover £179 million pounds.

### **Policies**

The BCM Codes of Ethics, which is available on the BCM Intranet, provides the foundational standards for all aspects of our business, and is applicable to all of our employees and operations globally. The Code makes this clear commitment:

“Fareva condemns the use of forced labour, slavery and human trafficking and child labour.” The Code further sets forth the responsibility of every employee to help ensure all of BCM's activities meet our high standards for behavior and business ethics, and establishes accountability for compliance with law and policy.

The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our confidential helpline.

The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.



With regard to our own labor practices, the Code further sets forth our standards for a diverse workplace that provides a safe and healthy environment and that complies with or exceeds local law. BCM HR Policies require an effective program be in place to help ensure compliance with labour laws involving migrant and foreign national workers.

Fareva`s CSR (Corporate Social Responsibility) policy is based on strong beliefs: the human aspect is our key concern and we pay close attention to our environmental impact.

### **Suppliers**

We want to work with suppliers who are open and transparent, so in order to reinforce this commitment, we request that our suppliers agree to our right of unannounced assessments at any time in their operating day/week.

We take part in ethical audits such as SEDEX and EcoVardis as requested by our customers. When sourcing new suppliers, we agrees with the Customer that it shall procure that the Supplier's personnel and any other person who performs services within the Supplier's supply chain shall comply with all Applicable Law relating to slavery and human trafficking (the "Anti-Slavery Requirements") including the Modern Slavery Act 2015;

### **Training and Awareness**

We conduct regular supplier conferences where we discuss our ethical standards as part of an ongoing engagement with our supply base. We also provide a supplier manual that explains our Code of Conduct and Business Ethics, assessment requirements, capacity building and continuous improvement programs.

### **Effectiveness and Performance Indicators/Monitoring**

We recognize that the risks from modern-day slavery change, and as such our approach to preventing modern-day slavery will be reviewed annually by Procurement Team. This approach will monitor and review:

Effectiveness of risk assessment processes

- Staff training programs
- Assessment programs (where applicable); and
- Reporting and escalation processes.



## Codes of Ethics

Fareva Group has built and developed on fundamental axes that have encouraged its growth.

Our mission is to support our customers in their development by the quality of the products we manufacture. This commitment is reflected in the spirit and action of each of our employees.

In this sense, the FAREVA Executive Committee established six golden rules.

These principles are binding on all FAREVA employees. They help conduct our business with integrity and professionalism in the following areas:

- Respect of regulation and Human rights
- Respect of individuals
- Health, Environment and Safety
- Quality
- Business Ethic
- Suppliers and sustainable procurement

We expect our clients and suppliers to do so as well.

### Respect of Regulation and Human rights

Fareva complies with all applicable state, local and environmental laws, rules and regulations governing all aspects of business, including development, manufacturing and sales of human and animal drugs.

Fareva believes in the fundamental dignity of every human being. We are committed to respect Human rights as recognized by principles of United Nations.

Fareva highly respects its collaborators, permanent and casual, and ensure safeguard their rights under their employment contract in accordance to local, national labour and social security laws and regulations, and applicable collective agreements

All Fareva workers are provided with a total compensation package that includes wages, overtime pay, benefits and paid leave which meets or exceeds the legal minimum standards or appropriate prevailing industry standards, whichever is higher.

Compensation terms established by legally binding collective bargaining agreements are implemented.

Workers are not required to work more than the regular and overtime hours allowed by the law of the country where the workers are employed.

Fareva condemns the use of forced labour, slavery and human trafficking and child labour.



### Respect of individuals

Each individual is treated fairly and works in a respectful and open manner. Fareva encourages solidarity throughout our business units and respects a culture of loyalty.

We always conduct our business honestly and honourably, taking account of ethical considerations and underprivileged communities.

We always strive to be fair and objective in our advice and actions, and we are never influenced in our decisions, actions or recommendations including in our recruitment process by issues of caste, national origin, ethnicity, religion, age, gender, marital status, sexual orientation, union membership, political affiliation, health, disability or pregnancy.

Fareva strives to maintain an environment free of any kind of harassment, violence, verbal abuse or other forms of intimidation and will not tolerate any of these behaviours.

Fareva aims to set an example as a good corporate citizen, working together with the community for its growth and the improvement of quality of life.

### Health, Environment and Safety

All our employees have the right to a healthy, safe and secure working environment.

An industrial production facility is an environment in which specific risks are always present. Fareva implements a pro-active health, safety and environment policy and trains its Employees in these procedures. We identify, understand and fully control hazards and potential dangers in order to protect our employees' health and to keep the environmental and biodiversity footprint of the facility to a minimum: these are the fundamental principles of Fareva is continuous improvement in this area.

### Quality

Throughout the manufacturing process, Fareva undertakes to comply and if necessary to go beyond the requirements of its customers and the regulations.

We work with our customers and suppliers to maintain our level of quality.

Fareva maintains a constant high level of quality, from selection of raw materials to the finished product and control throughout the manufacturing process.

By assigning to Fareva the manufacture of their products, our customers can count on the flawless commitment and skills of our teams. In this way they can be sure of obtaining a product fully conforming to their most stringent quality criteria.

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### Corruption

Fareva believes that corruption is unacceptable and rejects any form of bribes or other similar compensation that shall be given to a person, in order to attract or influence business activity.

Any demand for, or offer of, a bribe must be rejected immediately and reported to management.



### Money Laundering

All business and commercial dealings are transparently performed. Fareva recognizes the importance of preventing money laundering.

### Conflict of interest / Competition

Fareva employees must never permit their personal interests to conflict, or appear to conflict, with the interests of the company, its clients or affiliates. Fareva employees shall avoid to use Fareva contacts to advance their private business or personal interests at the expense of the company, its clients or affiliates.

All information about Fareva's competitors is obtained legitimately and will only be used for legitimate purposes in compliance with all relevant anti-trust and other laws and regulations.

No attempt is made at any time to divulge to Fareva any information about Fareva's competitors that is confidential to them and not in the public domain.

### Confidentiality

Confidentiality is taken extremely serious at Fareva. We understand our clients are entrusting us with their procedures, processes, and sensitive documentation.

Fareva can execute non-disclosure agreements with each of its clients.

Fareva employees will often come into contact with, or have possession of, proprietary, confidential or business-sensitive information and Fareva takes all appropriate steps to assure that such information is strictly safeguarded. This information, whether it is on behalf of our company or any of our clients or affiliates, could include strategic business plans, operating results, marketing strategies, customer lists, personnel records, upcoming acquisitions and divestitures, new investments, and manufacturing costs, processes, analytical methods and etc...

Proprietary, confidential and sensitive business information about our company, other companies, individuals and entities are treated with sensitivity and discretion and will only be disseminated on a need-to-know basis.

### Gift

We believe on the quality of the products and services we propose and we do not need to use gifts to build good relationships with customers.

We want to avoid any improper conduct with customers that could lead to a misunderstanding. Exchanging of gifts shall be moderate and only with a symbolic value.

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### Suppliers and sustainable procurement

Fareva treats its suppliers with fairness and integrity, and develops strong and long-term partnerships.

To contribute to the sustainable well-being of Fareva and to the high quality of its products, Fareva selects its suppliers based on quality, price, delivery, and reputation, environmental, business and ethical practices.

The selection of a supplier or subcontractor of goods or services must be carried out on purely objective and transparent criteria.



“At all levels of their activity, the collaborators of Fareva act with honesty and ethics. Our reputation is built on the values of honesty, fairness, respect, responsibility, integrity and trust.”

**Richard Whall**

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

**Managing Director  
BCM Fareva**