



## MODERN SLAVERY ACT STATEMENT

Warpaint London plc maintains a corporate culture consistent with its strategic objectives which aims to promote an ethical and responsible business. Modern slavery is a crime and a violation of fundamental human rights. This statement underlines our commitment to seeking to ensure that modern slavery is not taking place anywhere in and around our organisation.

## SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made on behalf of Warpaint London plc and its subsidiaries (the “Group”) pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and constitutes our slavery and human trafficking statement for the financial year ended 31 December 2023.

### STRUCTURE AND BUSINESS OPERATION

Warpaint London plc is registered in England and Wales (registration number 10261717).

Warpaint sells branded cosmetics under the lead brand names of W7 and Technic. W7 is sold in the UK primarily to retailers and internationally to local distributors or retail chains. The Technic brand is sold in the UK and continental Europe with a significant focus on the gifting market, principally for high street retailers and supermarkets. In addition, Warpaint supplies own brand white label cosmetics produced for several major high street retailers. The Group also sells cosmetics using its other brand names of Man’sstuff, Body Collection and Chit Chat, each targeting a different demographic.

### SUPPLY CHAINS

The majority of the Group’s own-brand products are manufactured at factories in China although some products are manufactured in the UK and Europe. There are also supply chains of mainly services and consumables in the UK and Europe. The distribution and sale of products to customers worldwide is either direct to retailers, online or via distributors and agents.

### OUR APPROACH TO SLAVERY AND HUMAN TRAFFICKING

The Group has relationships with businesses around the world and is opposed to modern slavery and human trafficking wherever it may occur. The Group’s processes and supply chains are examined and reviewed at least annually to ensure that slavery and human trafficking are prevented in its business and supply chains. Compliance with the Modern Slavery Act 2015 or equivalent anti-slavery and human trafficking laws are mandatory in all supply contracts.

Suppliers are visited at least annually, and regular contact maintained at other times through trade shows, meetings and other close communications. The Group’s principal suppliers are made to feel part of the organisation with an open and honest dialogue encouraged so that feedback can be communicated, and a rapid response provided. The Group has an office in Hong Kong enabling more





frequent visits and enhanced supplier contact. A strong relationship with the Group's suppliers is vital to the long-term success of the Company and to seek to ensure that our Suppliers are aligned with our ethics and values.

Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

## **VERIFICATION AND SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

The Group requires its suppliers to operate in compliance with all applicable laws, including laws pertaining to forced, trafficked or child labour.

Our procurement process includes vetting every new supplier and carrying out a risk analysis based on the nature and value of the product or service. This process includes confirmation of compliance with the Act. Supplier responses are taken into consideration when short-listing and we make any concerns known to the supplier. Should suppliers fail to meet our standards or be unwilling to make any changes we may cease to engage with them.

In addition, the Group's major factories are members of the Supplier Ethical Data Exchange ("Sedex") and are required to undergo the annual Sedex Members Ethical Trade Audit ("SMETA"). Sedex follows the Ethical Trading Initiative ("ETI") based code, which requires *inter alia* that:

- Employment is freely chosen
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practised
- Regular employment is provided
- No harsh or inhumane treatment is allowed

The principal trading subsidiary of Retra, Badgequo Limited, is also a member of British Social Compliance Initiative ("BSCI") and many of its main factories also undertake periodic third party BSCI audits of their factories.

## **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

In the financial year ended 31 December 2023 no reports of modern slavery practices were received from employees, the public or law enforcement agencies.

## **TRAINING**

The Group requires staff to participate in training and induction on commencement of employment, which includes adherence to the Group's policies and procedures.





## ONGOING PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

In order to strengthen our processes in this area, we continue to review and develop our supplier monitoring and due diligence as part of an ongoing assessment. This ongoing assessment will further develop performance indicators to monitor our effectiveness in combating modern slavery and human trafficking and will include enhanced training for those who need to be the most vigilant to ensure that such practices do not occur within our organisation or our procurement and supply chain.

This Modern Slavery Statement was approved by the board of directors of Warpaint London plc on 23 April 2024

Samuel Bazini

Chief Executive Officer

**Warpaint London plc**

