



MODERN SLAVERY STATEMENT 2019



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This statement has been published in accordance with the UK Modern Slavery Act 2015. It sets out the steps taken by Crown Paints Ltd and its subsidiaries up to the end of its previous financial year (ending 31st December 2018), to prevent modern slavery in its business and supply chain.

Introduction

This statement is made pursuant to Part 6 and section 54(1) of the Modern Slavery Act 2015 and sets out the steps that Crown Paints Limited ("Crown Paints") has taken (during the previous financial year) or will take (during the current financial year) to ensure that Crown Paints and companies in its supply chain are free from slavery and human trafficking.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Crown Paints has a zero tolerance approach to any form of modern slavery or human trafficking. Crown Paints is committed to acting ethically and to prevent slavery and human trafficking occurring in any of its corporate activities, as well as seeking to ensure that its supply chain is also free from such practices. Crown Paints is committed to acting with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within Crown Paints or its supply chain.

Our business organisational structure and operations

Crown Paints is a leading manufacturer of decorative paints and coatings in the UK and Eire, and also has distribution and licensing arrangements in place overseas. We are a part of the Hempel Group ("Group"), and our ultimate parent company is Hempel A/S (which is owned by the Hempel Foundation). Hempel A/S has its head office in Denmark. Crown Paints has two manufacturing sites in Darwen and Hull, and over 150 stores across the UK and Eire, employing approximately 1,200 employees within its business.

Policies relating to slavery and human trafficking

Crown Paints' policies reflect its commitment to acting ethically and with integrity in all its business activities and relationships, specifically:

Employee Code of Conduct - (available for download at www.hempel.com/en/about-hempel/how-we-do-it/our-code-of-conduct)

This policy describes how we should behave in our daily work, including how we should conduct ourselves when dealing with each other, our customers, business partners, suppliers and other stakeholders. It confirms our commitment to comply with applicable laws and act in an ethical, sustainable and socially responsible manner, and emphasises:

- That our employees are obligated not to associate with business partners who engage in any illegal activities, such as bribery or activities that violate human rights, and employees are required to report any incidents or potential issues related to business partners to their manager; and
- Our commitment to respecting human rights (in accordance with the United Nations' Guiding Principles on Business and Human Rights and the UN Global Compact). Employees are required to set a good example and not tolerate any violations of human rights.

Business Partner Code of Conduct (available for download at www.hempel.com/en/about-hempel/how-we-do-it/our-code-of-conduct)

It is essential that all of our business partners operate to the same ethical standards and integrity as we do. This policy was rolled out during 2018, and is intended to be used with all of our business partners. Our expectations take into account the UN Global Compact's ten fundamental principles within the areas of human rights, labour rights, the environment and

anti-corruption. The Group, of which Crown Paints is part, is a signatory to the UN Global Compact and has committed to implement the principles as part of our core operations. Our business partners are expected to work towards implementing the standards laid out in the policy and require the same from their own business partners. Areas covered include our business partner's:

Health and safety – to ensure safety rules, regulations and a safe and healthy work environment are in place, and there is a strive to promote an accident-free workplace;

Equal opportunities - to ensure an inclusive work environment, where everyone (regardless of age, gender, colour, race, disability, religion, belief, nationality, social status or any other status recognised by international law) is treated with respect, and discrimination and harassment in the workplace is eliminated;

Rights at work – to ensure rights at work are respected, by supporting the employee's right to freedom of association, recognising their right to be a member of a union or other collective bargaining group, and being compensated with fair pay for their work, as well as reasonable work breaks and paid holidays being provided in accordance with local law;

Child labour – to ensure no child labour is used, including in our business partner's own supply chain. Our expectation is set out in the policy; and

Forced labour – to ensure freedom of movement during employment and that personal documentation such as passports and/or payment of compensation are not retained or withheld to prevent such freedom of movement, thereby giving rise to forced or involuntary labour.

We make it clear that our choice to work with a business partner is not only based on the quality, price and professionalism of their services or products; it is also based on their respect for our commitment to conduct business in an ethical, environmental and socially responsible manner in accordance with the Business Partner Code of Conduct. We set out that we may request that certain business partners work with us openly and transparently to assess whether they are compliant, which may include a requirement to complete a self-assessment questionnaire, or an onsite audit and may ultimately end in a termination of the relationship, in cases of repeated or serious breaches of our Code.

Ethics hotline

As a responsible employer, Crown Paints encourage its employees, customers, partners and other stakeholders to report or question any suspected cases of potentially unethical or illegal behaviour. If unable to report concerns to Group Legal, the People & Culture department or the Regional Ombudsman, there is an Ethics Hotline available (see www.hempel.ethicspoint.com), which explains this whistle-blower system that allows anyone to make anonymous reports about suspected unethical or illegal practices, such as fraud, law violations or corruption within the Group.

Crown Paints will monitor whistleblowing reports to ensure that modern slavery and human trafficking do not occur within its business or supply chain.



Training and awareness

In order to ensure that our key employees are aware of and understand the issues and risks posed by modern slavery and human trafficking, and to help prevent it from occurring, we have built on the 2017 training provided to employees holding procurement roles (of raw material and infrastructure), and held sessions during 2018 for the Crown Paints Leadership Team and the procurement team who purchase of Sundries for our Crown Decorating Centres.

Whilst mandatory online training has been provided to all PC Users within the Crown Paints business prior to the end of 2018, to ensure familiarity with our Employee Code of Conduct, the Business Partner Code of Conduct has also been introduced to our procurement and export teams.

Our supply chain

The main products and services purchased within Crown Paints' supply chain are:

- Sundry decorating products ("Sundries") for resale through our Crown Decorating Centres
- Packaging;
- Equipment and machinery, for the offices and manufacturing facilities;
- Transport and Logistics;
- Skilled and unskilled labour; and
- Services, such as those to support our marketing activities.

Risk Assessment, Due Diligence and Performance Indicators

We have identified the purchase of raw materials and Sundries as the two highest risk areas in our supply chain, in relation to modern slavery and human trafficking issues, because of a lack of transparency and the location from which some are directly or indirectly sourced.

We currently conduct due diligence on all of our raw material suppliers before granting them the status of becoming a preferred supplier, including a requirement on them to complete a Supplier Assessment Questionnaire, and which includes questions on child labour, forced labour, workplace discrimination and rights at work. This risk mitigation is further supported by our standard form T&Cs of Purchase which requires suppliers to warrant that they pay their employees the minimum wages and benefits, prohibit child / forced labour and abuse, and comply with laws relating to employment rights.

In relation to the suppliers of Sundries to us, for resale in our Crown Decorator Centres, we intend to write to each of them to request that they complete a Modern Slavery Supplier Questionnaire, in order to provide us with more information and the comfort that their supply chain is free from modern slavery and human trafficking. During 2018, we mapped out our Sundry suppliers (in order of spend), and intend to write to the top 20, prior to 30th June 2019, and then deal with any issues that arise from the responses and arrange more vigilant monitoring of high risk suppliers.

We will also revisit our standard T&Cs of purchase, to ensure that they contain adequate audit rights for us to attend their premises, and take action, should we suspect non-compliance with the Modern Slavery Act.

A further action identified for completion during 2019 is to review the training records of all Crown Paints employees (including non-PC users) to ensure they receive training on our Employee Code of Conduct.

Crown Paints remains committed to upholding human rights and combatting modern slavery from our supply chain and we will be reviewing our progress and effectiveness on an annual basis.

This Slavery and Trafficking Statement has been approved by the Board of Crown Paints Limited.

SIGNATURE OF DIRECTOR *P Cefai*
PHILIP CEFAI

Date *28th March 2019*




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PAINTS



A part of  **HEMPEL**

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