



STAR BRANDS MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2024

This statement has been published in accordance with the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for the financial year ending April 2023.

INTRODUCTION

Star Brands is committed to combatting slavery and human trafficking, acting ethically and with integrity in all our business dealings and relationships. This statement sets out our commitment and the actions we have taken to identify, prevent and mitigate the risk of modern slavery and human trafficking across our practices.

ORGANISATIONAL STRUCTURE

Star Brands is a privately owned British company manufacturing a range of household cleaning and laundry products principally sold within the retail sector. The business's Head Office resides in Leeds UK, whilst products are manufactured predominately in the UK with smaller facilities operating in the United States and Europe with worldwide distribution, both as our own brand product ranges including Stardrops, Wizz and The Pink Stuff range and together with retailer branded products for individual customers.

Our business model is built on caring for our customers. Our objective is to give our customers the highest level of trust and confidence in all of our products and services. We aim to do this through developing business relationships based on honesty, fairness and respect. Our priority for quality extends to our export customers. They receive the same offering from Star Brands as our UK customers; quality products, meeting deadlines and managing costs.

The Company employs c300 people principally at our Worcestershire UK facilities. These facilities include operational functions such as Production, Warehousing/Logistics, Quality Assurance/Technical and New Product Development, Health and Safety, Engineering/Projects, Materials Planning, Customer Services and Human Resources with remaining functions of Sales, Marketing, Finance, IT and Procurement positioned in Leeds Head Office UK.

SUPPLY CHAINS

Our products are largely supplied directly to our UK clients with an ever increasing supply of products overseas equating to 55% export. Where this is the case our brands are translated into the necessary languages and adhere to the relevant countries' regulatory requirements

All our exported business is supplied either through local distributors or also through sales agents both of which would represent Star Brands.

Star Brands arranges logistics in line with the customer requirements whether this be arranging distribution for the customers or working collaboratively with customers own distributors. This highly collaborative approach with both suppliers and customers enables us to ensure that we prioritise transparency and fairness. This extends to our supply chains.

www.starbrandsltd.co.uk

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OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We have a zero-tolerance approach to modern slavery. In keeping with our values of honesty and fairness, we are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

Our full policy is available from the Human Resource department, is available across the business and via our official website www.starbrandsltd.co.uk

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our efforts to monitor and mitigate risk of slavery and human trafficking occurring in our supply chain we have adopted the following due diligence procedures:

- encourage reporting of concerns surrounding potential breaches of our Anti-Slavery and Human Trafficking Policy including a culture of mutual responsibility and transparency.
- protect whistleblowers.
- identify, assess and monitor potential risk areas in our supply chains.
- mitigate the risk of slavery and human trafficking occurring in our supply chains.
- where appropriate, use procedures to terminate agreements with individuals and organisations who breach our Modern Slavery Policy.

SUPPLIER ADHERENCE TO OUR VALUES

We have a zero tolerance approach to modern slavery and this extends beyond our immediate employees. As a Brand, we pride ourselves on the strength of our commercial relationships. In line with this, we focus on building relationships and gaining increased transparency from our suppliers to allow us to work together to improve social compliance. To ensure all contractors and those in our supply chain comply with our values, we have in place a rigorous supply chain compliance programme, including:

- As part of our contracting processes, the inclusion of specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.



- Where appropriate, providing support and guidance to our suppliers to help address coercive or exploitative work practices in their own business and supply chains.
- Encouraging employees at all levels to raise any concerns regarding supply chains, even if they turn out to be mistaken. This helps us to identify and assess areas of risk.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training and signposting to our employee. We also require our business partners and suppliers to provide training to their employees. This includes:

- training on our Modern Slavery Policy and the specific risks our business faces from modern slavery and its supply chains, given to all staff members as part of the induction process.
- regular additional training provided as necessary.
- a culture promoting transparency and whistleblowing.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Management at all levels are responsible for monitoring our effectiveness, dealing with any queries, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- Consistent with our values of trust and respect, all staff are encouraged to suggest ways to improve our existing policy or any shortcomings.
- We commit to review our policy regularly.
- Individuals are advised to go to their Supervisor / Manager or the Human Resource department if they wanted to raise an issue/concern re modern slavery

FURTHER STEPS

In line with our values of honesty and fairness, we commit to reviewing our Modern Slavery Policy, Statement and Practices and its effectiveness regularly.

FINAL POINT

Modern slavery is a fluid and ever-changing problem. As a result, we will continually review our policies, procedures and controls to ensure that our business and supply chains are free from modern slavery.

Signed by:

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