

# MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

The present statement relates to the financial year ending December 31, 2023 and is made by BIC UK in compliance with the UK Modern Slavery Act 2015.

The following describes its actions to identify, monitor and mitigate all potential human rights risks related to its business and the steps taken to combat modern slavery and human trafficking in its own operations and supply chains.

Guided by its values, BIC UK is committed to operate with the strongest ethical standards and principles. BIC UK expects all its business partners to conduct their business with the same high standards.

## **1. BIC's ORGANISATION**

BIC UK conducts business in the distribution of consumer products. BIC UK is part of BIC group ("BIC"), and its ultimate parent company is *Société BIC*.

BIC is a world leader in Stationery, Lighters and Shavers. For the past 75 years, BIC has met consumer needs with high-quality, safe, affordable and essential products.

BIC operates through 24 plants, which are organized by consumer business category, and located in Europe (France, Spain, Greece), North America (U.S, Canada), Latin America (Mexico, Brazil), Africa (Tunisia, South Africa, Kenya, Nigeria) and Asia (China, India).

92% of BIC's net sales come from products made in its factories, thus, reliance on contract manufacturing is relatively low. BIC recognises that controlling its value chain is a source of opportunities to promote its values, a culture of quality control and production management.

## **2. BIC's VALUES AND POLICIES**

BIC does not tolerate any form of modern slavery or any type of human trafficking. BIC is committed to uphold ethics and human rights in the workplace and has drawn up a series of policies to facilitate risk management. The ones that specifically address the areas related to human rights include the following:

**BIC new Code of Conduct** was deployed in 2023. It reflects BIC's commitment to conducting its business ethically and in accordance with all relevant laws, regulations and industry standards. The Code of Conduct also provides information on key areas of business activity, such as human rights and fundamental freedoms, and outlines the responsibilities of every BIC employee. It applies to all employees, officers, directors of all BIC entities and factories, as well as contract manufacturers.

BIC expects all its business partners to comply with the Code of Conduct and reserves the right to immediately terminate its business relationship with any contract manufacturer or supplier who does not comply with the Code of Conduct.

**BIC's Supplier Code of Conduct** outlines BIC's expectations and gives guidelines with respect to responsible sourcing, including BIC commitments to human rights, the environment, health and safety, business ethics and the development of a diverse and sustainable supply chain.

All suppliers and subcontractors, as well as their own suppliers and subcontractors, must comply at all times with the Supplier Code of Conduct in addition to all national and local laws, and regulations in force in their respective markets. When local laws or standards differ from the current Supplier Code of Conduct, BIC requires its suppliers to comply with the stricter standards and principles.

The Supplier Code of Conduct requires adherence to the following principles, amongst others:

- A safe and healthy working environment
- Fair wages and reasonable working hours
- Prohibition of child labor
- Prohibition of forced labor
- Non-discrimination
- Prohibition of abusive working practices and harassment
- Freedom of association and collective bargaining
- Legal compliance
- Environmental responsibility

In a spirit of continuous improvement, BIC is committed to working with its suppliers and supporting their efforts to meet and exceed the standards of the Supplier Code of Conduct.

**BIC Responsible Purchasing Charter** (incorporated in the Supplier Code of Conduct) and **Global Procurement Policy** aim at ensuring good practices around the management of BIC's external spend to suppliers, the supplier's selection process, and adherence to BIC Supplier Code of Conduct.

**BIC Product Safety Policy** specifies the commitments adopted to ensure that the products developed and manufactured by BIC are safe in terms of human health and the environment.

**BIC Environment, Health & Safety (EH&S) Policy** codifies BIC's commitment to improve its industrial activity, from production to distribution, in order to minimize BIC's impact on the environment where possible.

**BIC Charter of Diversity**, which was signed by the CEO and the Group's Human Resources Director, demonstrates BIC's commitment to diversity in its business.

In addition, the company-wide program, "**BIC Speak Up**" encourages employees to report any potential violation of the Code of Conduct and related policies through different channels, including an anonymous and confidential reporting hotline operated by a third-party service provider. This hotline is accessible by telephone and Internet and is available in more than 200 languages. BIC is committed to maintaining a zero-tolerance policy on retaliation against employees who reported suspected breaches.

### **3. RISK ASSESSMENT**

BIC has taken a series of measures to assess and mitigate risks, including human rights risks.

For instance, in accordance with the Vigilance Law, and with article L.225-102-4 of the French Commercial Code, BIC carries out required risk mappings to identify, analyze and prioritize major risks related to human rights and fundamental freedoms (including modern slavery or human trafficking), health and safety as well as environment. This risk mapping exercise is part of BIC's different risk management initiatives as well as part of the vigilance plan (the "Vigilance Plan").

In 2023, representatives of various departments, including Sustainable Development, Purchasing, Legal and Group Risk Management continued working on the monitoring of the implemented measures regarding the Vigilance Plan. BIC will continue to evaluate the impact and effectiveness of its actions in order to always improve its understanding of the risks it may face.

As a global consumer products manufacturer, BIC recognizes that certain of its activities and jurisdictions in which it operates present greater potential risks related to the non-respect of fundamental human rights. These risks include child labor, discrimination or forced labor.

BIC relies on international standards and industry best practices to define and assess potential risks with respect to human rights, and to develop associated policies and procedures.

For further information, please refer to the Vigilance Plan which is part of BIC's Universal Registration Document for 2023.

### **4. DUE DILIGENCE PROCESSES AND MONITORING**

As part of initiatives to better manage and monitor human rights related risks, BIC identifies high-risk suppliers on a number of parameters including known risk areas in the supply chain and country of location. In 2023, BIC has updated the list of strategic suppliers and performed strategic suppliers' due diligence reviews as part of its Vigilance plan.

One of BIC's priorities is to continue enhancing its supplier diligence process to improve transparency in its supply chain. In particular, BIC is revising its Supplier Qualification policy to strengthen human rights risk assessment for new suppliers.

In addition, suppliers are required to accept and abide by contractual provisions addressing compliance with a range of ethical standards, including human rights requirements.

BIC has also implemented a social audit program to ensure compliance with its Code of Conduct in factories where BIC® products are manufactured, covering global and local contract manufacturers. Regular on-site audits are conducted, following a risk-based approach, to verify that standards are maintained at a satisfactory level. Audits are carried out by third-party auditors *via* the Workplace Conditions Assessment ("WCA") platform. This assessment tool is based on international human rights principles and national laws, incorporating International Labor Organization ("ILO") standards and best practices.

The WCA comprises over 180 evaluation criteria, including the following topics:

- child labor;
- forced labor;
- discrimination;
- harassment;
- freedom of association;
- working hours;
- salaries;
- employment contracts;
- health and safety;
- environmental responsibility.

All contract manufacturers producing BIC® products are audited over a two-year cycle, during which improvement programs are implemented based on deficiencies identified during the assessment.

## **5. TRAINING & AWARENESS**

BIC continuously monitors compliance with laws and ensures team members are kept up to date regarding the BIC Code of Conduct through training and awareness campaigns. In 2023, BIC launched a global training campaign on the new Code of Conduct. All employees in all locations were invited to complete an online training in the company's learning management system with a deadline by the end of the year. In addition, BIC will conduct in-person trainings to factory-based employees that will include specific sections on human rights and working conditions.

The Code of Conduct is made available and distributed to all new employees as part of the onboarding process. It is available in multiple languages on the BIC Intranet, as well as the website [www.bic.com](http://www.bic.com).

BIC continues to work to embed respect for human rights in its operations and to promote the protection of human rights across its supply chain. In this regard, BIC will continue to enhance its global risk assessment model through a cross-functional approach throughout the organization.

This statement was approved by the Board of Directors of BIC UK dated 20 May 2024.

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Brett Conrad Griffiths, Director, for and on behalf of BIC UK Limited