

## PROCTER & GAMBLE UK STATEMENT PURSUANT TO THE UK MODERN SLAVERY ACT 2015

Procter & Gamble UK (“P&G UK” and “we”) provides branded consumer packaged goods. We are a part of the global Procter & Gamble group of companies (“Group”), and our ultimate parent company is The Procter & Gamble Company (“P&G”). P&G’s head office is in the United States of America. More details of the structure of our business can be found at [http://www.pg.co.uk/who\\_we\\_are/structure\\_governance](http://www.pg.co.uk/who_we_are/structure_governance).

The UK Modern Slavery Act 2015 requires commercial organizations carrying out business in the UK with an annual turnover of at least £36 million to publish a modern slavery statement. The following describes the steps taken across the Group, including P&G UK, to combat slavery and human trafficking on a global basis:

### **Organization**

The Group’s products are sold in more than 180 countries and territories through mass merchandisers, e-commerce (including social commerce) channels, grocery stores, membership club stores, drug stores, department stores, distributors, wholesalers, specialty beauty stores (including airport duty-free stores), high frequency stores, pharmacies, electronics stores and professional channels. The Group also sells direct to consumers.

The Group has on-the-ground operations in approximately 70 countries, including 104 manufacturing sites, and has about 107,000 employees worldwide. In total, across its entire supply chain, (e.g., raw materials, packaging, services, equipment), the Group works with tens of thousands of suppliers.

### **Policies**

Through the Group’s policies and procedures, we are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. The Group’s Human Rights Policy Statement reflects our commitment to respect and promote the human rights of our employees, our external business partners, and the communities in which we operate. We support the U.N. Guiding Principles on Business and Human Rights, which respects and honors the principles of internationally recognized human rights, including those expressed in the International Bill of Human Rights (i.e., Universal Declaration of Human Rights, the International Covenants on Economic, Social and Cultural Rights, and the International Covenants on Civil & Political Rights); the principles concerning fundamental rights as set out in the International Declaration on Fundamental Principles and Rights at Work; and the United Nation’s Declaration on the Rights of Indigenous Peoples.

### **Due Diligence Processes**

Human rights due diligence consists of the processes that the Group follows to manage actual and potential impacts on individuals’ human rights while engaging stakeholders throughout the process. The Group works to promote sustainable practices, support value creation, and assess both actual and potential adverse human rights impacts. The Group strives to implement and improve systems in business relationships across our value chain in order to mitigate the risk.

The Group’s approach comprises the following:

- **Assess & Identify:** Actual or potential impacts on people, using a risk-based approach
- **Integrate & Act:** Take steps to prevent adverse impacts from occurring; mitigate their likelihood and severity; leverage the Group’s business relationships to influence; and work to enable an effective remedy
- **Track & Monitor:** The effectiveness of the Group’s business process for assessing and addressing adverse impacts
- **Communicate:** Share information with stakeholders on how the Group addresses adverse impacts and risk, including, where appropriate, through public reporting
- **Openly engage:** With business partners and stakeholders to understand potential human rights impacts and develop meaningful actions to work to address adverse impacts

The Group conducts its due diligence processes and facilitates compliance with the Modern Slavery Act 2015 through its multifunctional Responsible Sourcing Team. Led by the Purchases and Legal functions, the team has designed and implemented processes globally for supply chain review, supplier and employee outreach, due

diligence, and risk management.

As part of its initiative to identify and mitigate risk, the Group evaluates suppliers and identifies high-priority suppliers on a number of parameters including known risks and country location. The Group requires that an independent, third-party auditor audit high-priority suppliers, and, if outages are found, that supplier is re-audited within two years. These audits are announced beforehand, and the auditors utilize the Sedex Members Ethical Trade Audit (SMETA) Best Practice Guidelines and audit report format.

Suppliers are encouraged to report any ethical concerns or policy violations, as outlined at <https://pgsupplier.com/guidelines/report-a-concern>. This reporting mechanism is operated by a third-party supplier to help ensure anonymity. The Group also has tailored compliance monitoring programs and a dedicated grievance mechanism for commodity supply chains where the Group has identified heightened risk of environmental and human rights impacts, including forced labor and modern slavery. More details on the Group's process can be found at <https://pgsupplier.com/>.

### **Supplier Adherence to the Group's Values and Ethics**

The Group's [Worldwide Business Conduct Manual](#) (WBCM) explains the global standards to be followed in our daily business activities as well as our legal and ethical responsibilities. The WBCM applies to all employees and members of the P&G Board of Directors, regardless of location, seniority level, business unit, function, or region. The Group also expects external parties with whom the Group does business to follow standards equivalent to the WBCM.

The Group's [Responsible Sourcing Expectations for External Business Partners](#) explains the global standards to be followed in daily business activities on our behalf. External business partners, their subcontractors and suppliers are expected to be informed of and share our commitment to these standards. The Group reserves the right to conduct audits to assure compliance with these expectations and also reserves the right to discontinue any relationship should the external business partner violate, fail to correct, or have a pattern of violating these expectations.

We do not permit the use of child labor, forced labor, compulsory labor, slavery, prison labor, indentured labor, bonded labor or use of corporal punishment or other forms of mental and physical coercion as a form of discipline across its own operations and throughout its supply chain. An individual of less than 15 years of age is considered a child. If local law set a minimum age below 15 years, and the minimum age is in accordance with the exceptions under International Labor Organization Convention 138, then the minimum age will apply. For hazardous work, an individual of less than 18 years of age is considered a child.

### **Speaking Up**

The Group is committed to creating a work environment that fosters open communication and supports employees in reporting potential violations of the Group's policies or the law. Employees and individuals in our operations or extended supply chain can report violations at the [Worldwide Business Conduct Helpline](#), which is staffed by an independent third party 24 hours a day, seven days a week and includes, where permitted by local law, an anonymous way to report concerns. The Group is committed to reviewing all allegations of wrongdoing with trained teams who ensure thorough, impartial, and fact-based investigations. Proper investigation is essential to promoting a culture of integrity, reducing the likelihood of incidents occurring and increasing willingness to proactively raise concerns. It is an important part of our commitment to prevent and detect wrongdoing. Retaliation for raising concerns in good faith is inconsistent with our Values of Integrity and Trust and simply will not be tolerated.

### **Training**

The Group has been working to strengthen education and develop awareness-raising tools. This includes a series of short videos (less than 2 minutes each) to help our employees and those of our vendors and contractors recognize human rights issues in the workplace. By learning how to spot problems in the office and manufacturing facilities, employees can be empowered to speak up and get help for others.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes P&G UK's slavery and human trafficking statement for the financial year ending 30 June 2024.

To ask a question or report a concern please visit  
<https://secure.ethicspoint.com/domain/media/en/gui/73321/index.html>.

Procter & Gamble UK

Date:   
Chris Young (Dec 23, 2024 06:25 GMT)