

Ceuta Group – Modern Slavery Statement

Introduction

This statement sets out Ceuta Group's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in Ceuta Group's own businesses and its supply chains. This statement relates to actions and activities during the financial year 1 April 2020 to 31 March 2021.

Description of Business Activities:

Distributors, Agents, Sellers & Manufacturers of Health, Personal Care, Cosmetics, Beauty and FMCG Food, Drink and Household Products, Consultancy Services and Digital and Search Marketing Agency to the Pharmaceutical, Grocery and Beauty Industry.

Marketing Consultancy, Digital Multi-Channel Sales, Field Sales, Merchandising, Consumer, Shopper & Category Marketing, Data Insight, Media Strategy, Experiential Marketing and Advisory company for Health, Personal Care, Cosmetics, Beauty and FMCG Food, Drink and Household products on behalf of Clients and as a Brand Owner.

Organisation's structure

The Ceuta Group consists of a number of companies providing a range of outsource goods and services and includes some brand ownership.

Companies operating in the UK

Ceuta Healthcare Ltd

Sales, Brand Management, Brand Ownership, Marketing and Distribution Services

Incorporating

Ceuta International Ltd

Sales, Brand Management, Marketing and Distribution Services

Go2Grocery Ltd

Sales, Brand Management, Marketing and Distribution Services

1HQ Ltd

International Branding and Brand Strategy Consultancy

Incorporating

Collidascope Ltd

Shopper Insights and Analytics

Impackt Ltd

Advertising Design and Print Management

Creative Leap Ltd

Multi-disciplinary Brand and Communications Consultancy

Orchid Field Marketing Ltd

Field Sales, Merchandising and Store Auditing

Bridgethorne Ltd

Consumer Insights and Training Consultancy

Click Consult Ltd

Digital Marketing and Search Engine Optimisation Consultancy

Companies operating outside of UK

Brandshapers Ltd Republic of Ireland

Sales, Brand Management and Distribution Services

1HQ USA, LLC

27th April 2021

International Branding and Brand Strategy Consultancy

1HQ Netherlands BV

International Branding and Brand Strategy Consultancy

1HQ Singapore Pte Ltd

International Branding and Brand Strategy Consultancy

Supply Chains

We aim to work with third party suppliers that share our values and work to ethical and business standards expected by Ceuta Group, which is set out in our 'Supplier Code of Conduct'.

Supply chains across the Group include:

- Goods and services used to manufacture our own products and on behalf of Clients, such as raw materials, finished and semi-finished products and packaging
- Working with third parties on transportation and warehousing
- Working with third parties on marketing and advertising
- Partnering with International business alliances providing distribution sales channels across the World
- Using a variety of goods and services both nationally and locally to source goods and services for day to day running of our businesses

Assessment of Modern Slavery Risk

The risk of modern slavery in our directly employed workforce is very low, due to our employees undertaking work in controlled environments where there are established policies and processes.

Our approach to recruitment and selection includes verification of relevant documentation for eligibility to work in the country of employment. We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting people from the agency.

Our exposure to the risk of labour exploitation increases where we engage with third parties, particularly those in high risk sectors (e.g. transportation, warehousing, manufacturing) and in some countries where human rights are not well protected the risks are heightened further.

We require our key partners within the areas referenced to uphold high standards, values and support for their employees, including support for the Modern Slavery Act 2015. For 2021, this will include:

(1) undertaking checks and/or investigations of suppliers as part of the procurement process;

(2) seeking contractual assurances when entering into a contact with new suppliers

In addition, we are mapping our supply chains to assess particular industry sector and geographical risk, with a view to obtaining their policies and position relating to Modern Slavery and informing them of the Ceuta Group expectations in relation to adherence with all ethical standards and in accordance with the Company 'Supplier Code of Conduct'.

Policies:

Ceuta Group has policies in place to minimise risks and contribute to ensuring modern slavery and human trafficking does not occur in its business and supply chain. The policies and procedures are reviewed each year in light of the Act. Our businesses have the option to make local adjustments to these templates.

- Anti-Bribery and Corruption
- Equality, Diversity and Inclusion
- Health and Safety
- Procurement
- Supplier Code of conduct
- Recruitment
- Whistleblowing

We make sure our suppliers are aware of our policies and adhere to the same high standards. This year we will ensure that our key suppliers have access to our key policies and we will encourage them to have similar policies in place.

Modern Slavery Guidance, Due Diligence Support & Measuring Effectiveness

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the following due diligence procedures:

- (1) Our current Company guidance is available on our 'SharePoint' internal portal where it can be accessed by all employees. It states that anyone who suspects or witnesses any instances of modern slavery or human trafficking is to in the first instance report the case to the police in accordance with the laws of the country they are witnessed in, and then to inform the business.
- (2) We are evaluating and measuring effectiveness by ensuring we are communicating our responsibilities and commitment to the 'Modern Slavery Statement' to our employees, clients and supply chains.

These steps are designed to:

- Establish and assess areas of potential risk in our businesses and supply chains;
- Monitor potential risk areas in our businesses and supply chains;
- Reduce the risk of slavery and human trafficking occurring in our businesses and supply chains;
- Provide adequate protection for whistleblowers.

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

- To maintain 100% take-up of training by our employees (including new employees) as regards modern slavery training;
- To undertake 12 supplier audits

2021-2022

In this year we are committed to continue to review all Corporate Social Responsibility (CSR) related activity across The Ceuta Group

We have a Ceuta Group CSR committee, consisting of:-

Director of Talent Management & Development
Talent Management & Development CSR Executives from Companies in the Group
Operations and Compliance Manager
Communications Manager
Learning & Development Manager

The Committee include in their agenda a review of the company's Modern Slavery and Human Trafficking Statement.

This year we are committed to identifying and evaluating our supplier relationships. Using a Red Amber Green (RAG) system, we will assess the risks associated with these relationships. We will be conducting audits of suppliers and/or seek undertaking third party assistance to conduct risk assessment particularly where the supplier is based outside of the UK.

We are reviewing our contractual documentation sent to supplier to ensure that it includes appropriate contractual assurances from the supplier as regards their commitment to eradicating modern slavery and human trafficking from either their business or their supply chains.

We have a mandatory comprehensive training process for all employees on Modern Slavery and Human Trafficking through our web-based TMD Academy, which is monitored for completion of this training. The aim of this training is to help employees identify and report any potential breaches. Employees are taught the benefits of stringent measure to tackle

slavery and human trafficking as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

There is clear guidance within the training module for all employees to follow should they witness or suspect any form of Modern Slavery or Human Trafficking.

This Modern Slavery statement has been approved by a member of the Board of Management of Ceuta Holdings and applies to all companies that trade as part of the Ceuta Group.

Director's Signature

A handwritten signature in black ink, appearing to read 'R. Hester', written in a cursive style.

Robert Hester

CFO

27th April 2021