

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY - 2022

1. INTRODUCTION

- 1.1. Modern slavery is a criminal offence under the Modern Slavery Act 2015 ("the Act"). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. This document sets out the policy of MySkinDoctor Limited ("MySkinDoctor"), with the aim of the prevention of opportunities for modern slavery to occur within its business or supply chain. This policy's use of the term "modern slavery" has the meaning given in the Act.
- 1.2. MySkinDoctor have a zero-tolerance approach to modern slavery. 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.

2. STEPS FOR THE PREVENTION OF MODERN SLAVERY

- 2.1. MySkinDoctor is 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 Act.
- 2.2. We expect the same high standards from all of our contractors, suppliers and other business partners, and we are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.
- 2.3. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.
- 2.4. All employees have an obligation to conduct business in such a manner that the opportunity for and incidence of modern slavery is prevented. Relevant training will be provided to employees in identifying the signs of modern slavery and where appropriate, in implementing measures to prevent or minimise the risk of modern slavery in our business and supply chains as appropriate.
- 2.5. Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measures:
 - Conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas;
 - Engage with our suppliers both to convey to them our Modern Slavery and Human Trafficking

Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses;

- Introduce contractual provisions for our suppliers to confirm their adherence to this policy.

3. RESPONSIBILITY FOR THE POLICY

- 3.1. The Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 3.2. The Chief Operating Officer has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 3.3. Management at all levels is responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

4. EMPLOYEE COMPLIANCE WITH THE POLICY

- 4.1. All employees must ensure that they read, understand, and comply with this policy.
- 4.2. The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. All employees are required to avoid any activity that might lead to or suggest a breach of this policy.
- 4.3. All employees are obliged to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chain, at the earliest possible stage.

5. ACTIONS TO REPORT MODERN SLAVERY OR HUMAN TRAFFICKING

- 5.1. If any employee believes or suspects a breach of this policy has occurred or that it may occur in the future, they must communicate their concern to the company. MySkinDoctor's Whistleblowing Policy and Procedure is intended to provide guidance on how concerns can be communicated and applies to all employees. The Whistleblowing Policy and Procedure can be found in the Human Resources section of MySkinDoctor's intranet site.
- 5.2. If an employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, they should raise it with their manager or the Chief Operating Officer.
- 5.3. MySkinDoctor aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. MySkinDoctor are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery, of whatever form, is or may be taking place in any part of our business or in any of our supply chain. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. MySkinDoctor will accept and take seriously concerns communicated anonymously.
- 5.4. If an employee believes that they have suffered any such treatment, they should inform the Chief Operating Officer immediately. If the matter is not remedied, as an employee, you should raise it formally using MySkinDoctor's Grievance Policy and Procedure.

5.5. Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

6. COMMUNICATION AND AWARENESS OF THIS POLICY

6.1. Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for MySkinDoctor, and regular training will be provided as necessary.

6.2. MySkinDoctor's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of the business relationship with them and reinforced as appropriate thereafter.

7. BREACHES OF THIS POLICY

7.1. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

7.2. MySkinDoctor may terminate the relationship with other individuals and organisations working on MySkinDoctor's behalf if they breach this policy.

8. REVIEW

8.1. Following its initial adoption, this Modern Slavery and Human Trafficking Policy will be reviewed on a regular basis (at least annually) and may be amended from time to time. This Policy will be used to inform our Statement on Modern Slavery and Human Trafficking which is published annually in accordance with the legal requirements under the Act.



Jason Cale
Chairman
1st April 2022