# **Modern Slavery Act 2015** - Statement for Original Additions (Beauty Products) Limited for financial year 2017/2018

## Original Additions (Beauty Products) Limited

Original Additions is incorporated in the UK under and specializes in add-on cosmetics such as artificial eyelashes and nails, award-winning colour cosmetics and products for salon professions such as waxing, nail and lash products.

Our leading consumer brands include





Original Additions is wholly owned by PDC Brands, a US company, which is majority owned by CVC Partners.

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Original Additions has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place in its business or supply chain.

## Structure and business operations

We use a wide range of suppliers in more than 40 countries who supply goods for sale, provide services at events and support our operations.

Since becoming part of PDC Brands, we are working to map our suppliers and identify risks, including terms of employment and where recruitment agencies may be used.

### Policies and procedures

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. Key policies are reviewed annually and are provided to all employees on joining the company and circulated annually. All employees are able to raise any concerns with their HR contact in a confidential process.

Key policies also include a Supplier Approval Policy and Supplier Guidelines. Stakeholders across the business are involved in these policies, including Sourcing, Legal, Supply Chain Management and Operations Directors. Original Additions is considering further policies and codes of conduct, including possible enforcement mechanisms for such policies.

## **Our suppliers**

Original Additions operates a Supplier Approval Policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes screening for compliance with applicable laws and a review of working conditions.

For all our suppliers, Original Additions also seeks detailed external audits that include labour standards, health and safety, environment and business ethics, or carried out by Sedex Members Ethical Trade Audit (SMETA), Intertek, SGS or TUV. Such audits typically include all types of workers (direct employees, agency workers, workers employed by service providers and workers provided by other contractors). Any deviations are stated in the audit declaration and Original Additions carefully considers any actions required.

For all suppliers working with OA, the Original Additions team responsible for sourcing and quality will also carry out an on-site visit, which will evaluate matters such as quality control, manufacturing processes and working conditions.

We continue to develop our supplier monitoring and due diligence as part of our overall assessments.

## **Our performance indicators**

In the financial year 2017/2018, no reports of modern slavery practices were received from employees, the public, or law enforcement agencies. Our audits and 2019 risk assessment will further develop appropriate performance indicators to monitor progress.

#### **Training**

Original Additions requires staff to participate in training and is reviewing its training in relation to procurement and supply chain for 2019.

Original Additions is also a member of the industry body Cosmetic, Toiletry & Perfumery Association (CTPA), which coordinates the industry's viewpoints to promote good working practices to ensure that consumers are provided with the very best products.

Approval for this statement

This systement was approved by the Board of Directors on March 29, 2019.

John Owen, Director March 29, 2019