



# Ceuta Group – Modern Slavery Statement

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## 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 2019 to 31 March 2020.

## 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*

30<sup>th</sup> March 2020

Incorporating

**Ceuta Healthcare 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*

30<sup>th</sup> March 2020

## 1HQ USA, LLC

*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 would 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.

30<sup>th</sup> March 2020

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 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.

- Supplier Code of conduct
- Whistleblowing
- Equality, Diversity and Inclusion
- Anti-Fraud and Bribery
- Health and Safety

## Modern Slavery Guidance

Our current 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.

## 2020-2021

In this year we are committed to reviewing all Corporate Social Responsibility (CSR) related activity across The Ceuta Group. In the first instance a Ceuta Group CSR committee has been formed, consisting of:

Director of Talent Management & Development  
Talent Management & Development CSR Executive  
Operations and Compliance Manager  
Communications Manager

The immediate priorities of the Committee include a review of the company's Modern Slavery and Human Trafficking Statement.

We have committed to creating a yearly process for training all employees on Modern Slavery and Human Trafficking through our web-based TMD Academy, and to monitor the completion of this training.

We will be creating clear guidance for all employees to follow should they witness or suspect any form of Modern Slavery or Human Trafficking.

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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: *Robert Hester*

Robert Hester

Group Finance Director

30<sup>th</sup> March 2020