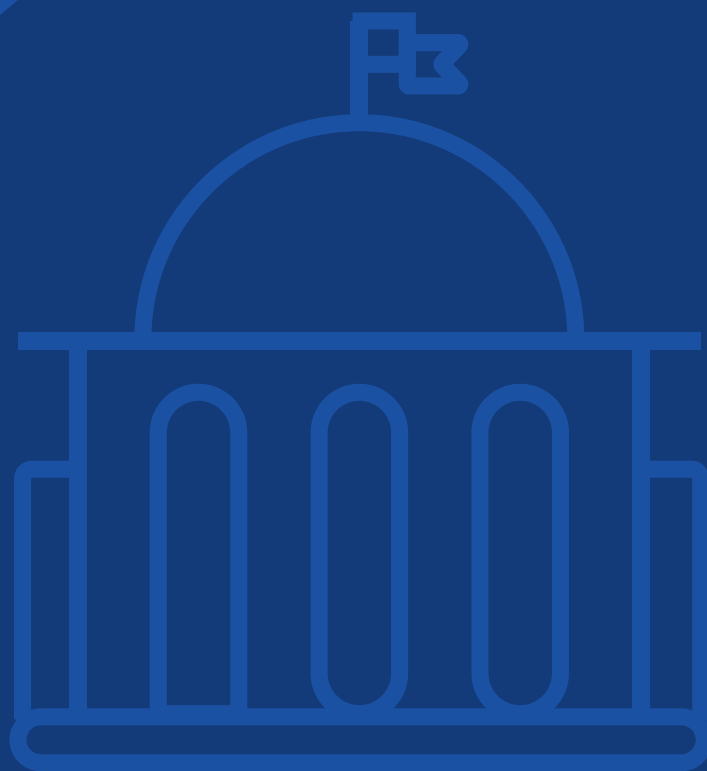


# CALIFORNIA *TRANSPARENCY* *IN SUPPLY CHAINS*

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## KIK UPHOLDS



GOVERNANCE



## We are KIK

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WE BRING EXCEPTIONAL BRANDS AND PRODUCTS TO CONSUMERS THAT HELP THEM PROTECT THE HEALTH AND WELLNESS OF THEIR FAMILIES AND THE CLEANLINESS OF THEIR HOMES AND POOLS.

ONE OF NORTH AMERICA'S LARGEST INDEPENDENT MANUFACTURERS OF CONSUMER PRODUCTS WITH MAJOR POSITIONS IN THE MULTI-BILLION DOLLAR HOUSEHOLD AND POOL CATEGORIES, KIK PARTNERS WITH A WIDE RANGE OF RETAILERS TO BRING OUR LARGE PORTFOLIO OF BRANDS AND PRODUCTS TO CONSUMERS EVERYDAY.

### **OUR PRODUCTS**

We offer leading brands and high-quality products that care for the everyday needs of consumers.



# Position Statement on Human Rights

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KIK CONSUMER PRODUCTS and its employees are guided by its Code of Conduct, the requirements that serve as a moral compass for how we conduct business, and the “One KIK” culture – these principles outline our obligations to our customers, our employees and our shareholders. Our commitment to conducting business in an ethical way includes a commitment to act in accordance with recognized human rights standards.

It is a country’s duty to uphold human rights by enacting an appropriate legislative framework

and KIK complies with all laws applicable to its operations around the world. KIK recognizes that some countries do not have adequate legal frameworks to protect human rights. As such, KIK upholds its commitment to ~~by~~ respecting, and requesting that its partners and suppliers respect, human rights consistently across all jurisdictions.

### OUR COMMITMENT TO UPHOLDING HUMAN RIGHTS IS ANCHORED IN THE FOLLOWING PRINCIPLES:

#### LABOR AND EMPLOYMENT

We employ individuals in full compliance with laws, including those concerning work hours, compensation, discrimination and working conditions. Employees have the right to organize or join associations, and bargain collectively, if they so choose.

#### MODERN SLAVERY

KIK does not engage in, support or condone any form of modern slavery, including human trafficking and child labour and abides by the spirit and the letter of its policy on Modern Slavery. We strictly prohibit our employees, suppliers and other business partners from engaging in modern slavery.

#### SAFE AND HEALTHY WORK ENVIRONMENT

KIK strives to maintain a clean, safe and healthy environment for its employees. As such, it requires full compliance with applicable workplace safety laws.

#### DISCRIMINATION, HARASSMENT AND VIOLENCE

KIK bases its employment decisions on merit only. We do not tolerate discrimination, harassment or violence and abide by the standards set out in our Workplace and Harassment Policy.

#### CHILD LABOR

Child labor is pervasive problem throughout the world, including Europe and United States. As an employer and purchaser of services and goods, KIK strongly condemns child labour. KIK will not tolerate the use of child labour, including contract labour, in any of its operations and facilities.

#### OUR SUPPLY CHAIN

We expect the suppliers and contractors with whom we do business to uphold the same standards. Violation of this policy statement by a supplier will result in the termination of its business relationship with KIK.



## Upholding our Commitment

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The State of California's *Transparency in Supply Chains Act* of 2010 requires us to disclose our efforts to eradicate slavery and human trafficking from our supply chains. Below is a summary of KIK's efforts (the numbered topics are taken directly from the Act).

**1. Engages in verification of product supply chains to evaluate and address risks of human trafficking and slavery. The disclosure shall specify if the verification was not conducted by a third party.**

KIK has implemented a risk screening process designed to proactively identify risks of forced and/or child labor in its supply chain. The risk assessment is informed by several factors, including industry and geography, and incorporates guidance from various governmental and non-governmental sources, including governmental information and guidance on Uyghur forced labor, supply chain research published by the U.S. Department of Labor.

The risk screening creates a tiered risk classification that allows KIK to prioritize and target its action to higher risk areas of its supply chain.

**2. Conducts audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains. The disclosure shall specify if the verification was not an independent, unannounced audit.**

Where higher risks of forced labor were identified, KIK initiates an internal audit of the employee selection and documentation process to ensure compliance with all applicable laws.

**3. Requires direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.**

KIK's supplier terms and conditions require its suppliers to comply with all laws applicable to their use of labor, including laws related to slavery or human trafficking, and requires them not to:

- a) engage or otherwise use any child labor;
- b) use forced labor in any form (prison, indentured, bonded or otherwise);
- c) require that its employees lodge original identification papers or monetary deposits on starting work;
- d) engage in or support the use of corporal punishment, mental, physical, sexual or verbal abuse;
- e) use cruel or abusive disciplinary practices in the workplace.

KIK's suppliers are further required to maintain policies and procedures to ensure their compliance with applicable laws relating to slavery, child labor and forced labor and implement due diligence procedures to ensure that there is no slavery or human trafficking in any part of their supply chain.



### Upholding our Commitment

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**4. Maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking.**

KIK's commitment to upholding human rights is anchored into a policy framework, which includes a Code of Conduct, a Policy Statement on Human Rights, a Modern Slavery Policy and a Child Labor Policy. The framework also includes a Whistleblower Policy and a hotline that allow employees to anonymously report concerns they may have. KIK's policy framework is periodically reviewed and updated to ensure it continues to appropriately address the risks as they may evolve.

KIK's policy framework flows down to its supply chain through its Supplier Code of Conduct. KIK employs a supplier risk assessment process and implements supplier terms and conditions that require its suppliers to uphold the same commitment.

**5. Provides company employees and management, who have direct responsibility for supply chain management, training on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products.**

To maintain awareness of its policy framework, KIK administers mandatory training to key employees on child labor and child labor risks and distributed and posted general awareness material in its facilities.



[kikcorp.com](http://kikcorp.com)