

# Modern Slavery Statement 2024

*Published in 2025*





# Content

Context	03
About this statement	04
01 Our business, structure and operations	05
02 How do we tackle Modern Slavery?	08
03 Measuring effectiveness	28
04 Stakeholder engagement	31
05 Future commitments	36
Appendix I Scope of the report	40
Appendix II Statements for compliance	41
Appendix III Glossary	42



# Context

Modern slavery exists in every corner of the world, and no country or industry is completely safe from its risks. It often hides in plain sight—for instance, on farms, in factories, on subcontracted workers —and many other everyday workplaces.

It doesn't always look like something extreme. Sometimes it starts with poor working conditions—low pay, long hours, or unsafe environments. But when these issues go unchecked, they can slide into serious abuse. That's what makes modern slavery so hard to spot. It sits at the far end of a spectrum of labor exploitation, and it's not always clear where bad practices end and slavery begins.





A large green combine harvester is shown in the middle of a vast cotton field. The field is filled with white cotton plants, and the harvester is moving through them, leaving a trail of harvested cotton behind it. The sky is a clear, pale blue, and a line of trees is visible in the distance.

# About this statement

This “Modern Slavery and Human Trafficking Statement” is made pursuant to section 54(1) of the *UK Modern Slavery Act 2015* and the *Australian Modern Slavery Act 2018*. It covers the financial year ending 31 December 2024 and outlines the steps Ontex Group NV and its subsidiaries ("Ontex") have taken to address and mitigate the risks of modern slavery and human trafficking in our business and supply chains.

This statement was approved and signed by Gustavo Calvo Paz, CEO of Ontex Group NV on June 2025. It is publicly available on [www.ontex.com](http://www.ontex.com).

This document should be read together with the **Human Rights Policy**.

Scope: All companies covered by the Statement are listed in Appendix I.



Our business, structure  
and operations

01



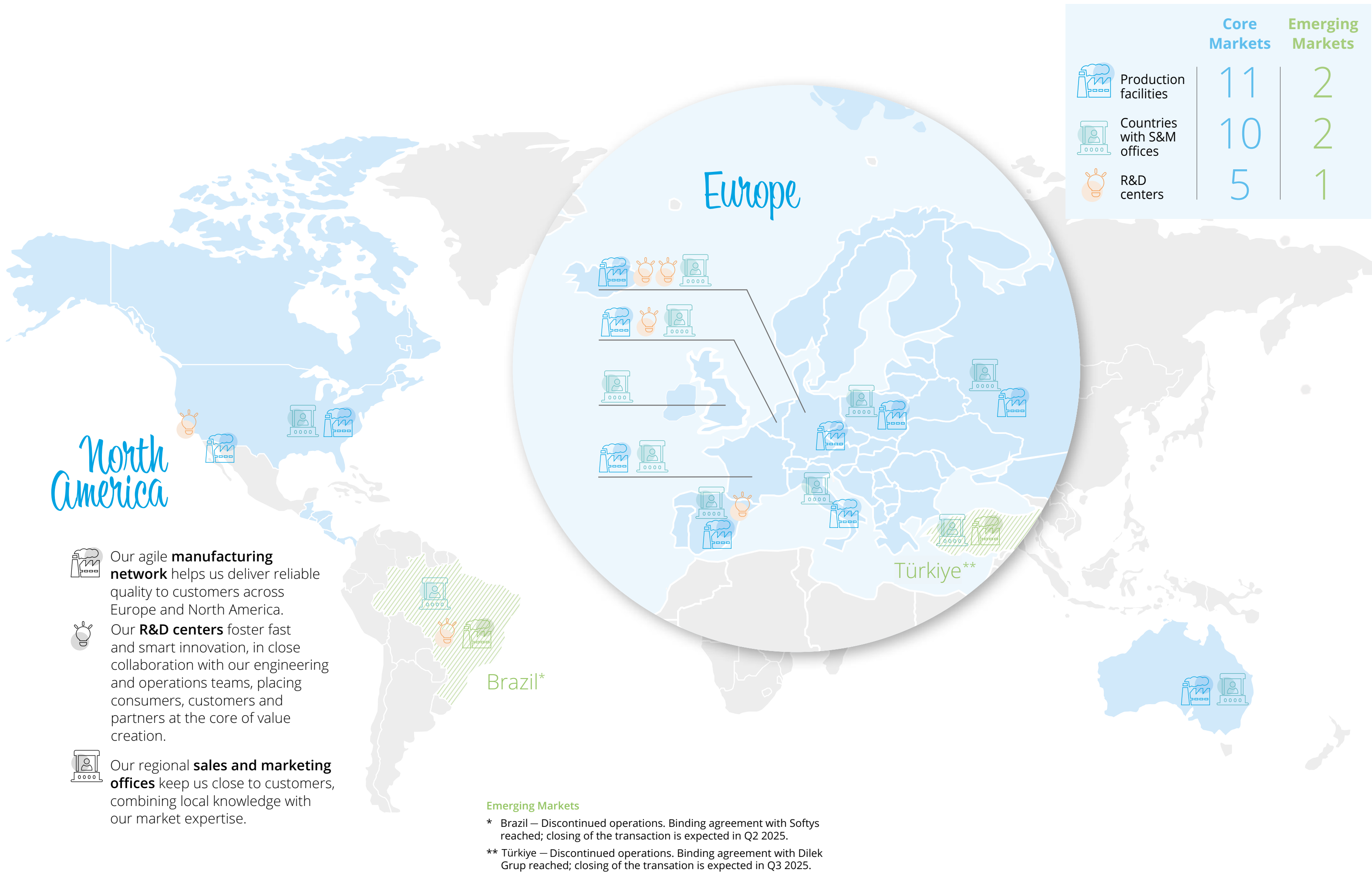
# Our presence

Ontex Group NV was founded in Belgium in 1979, and is headquartered in Aalst, Belgium. Ontex has evolved into a global leader in personal hygiene solutions for baby, feminine, and adult care. With a workforce of approximately 7,000+ employees worldwide, we operate 13 production facilities, distribute products to 100 countries, have sales and marketing sites in 12 countries, and run 6 R&D centers.

# Our sourcing

Our global supply chain includes, amongst others, raw material suppliers, contract manufacturers, logistics providers, as well as indirect spend suppliers. We recognise the complexity of our supply chain and the inherent risks it may present concerning labour exploitation and modern slavery, particularly in countries with weaker legal protections for workers.

This map shows the Ontex presence in fiscal 2024.



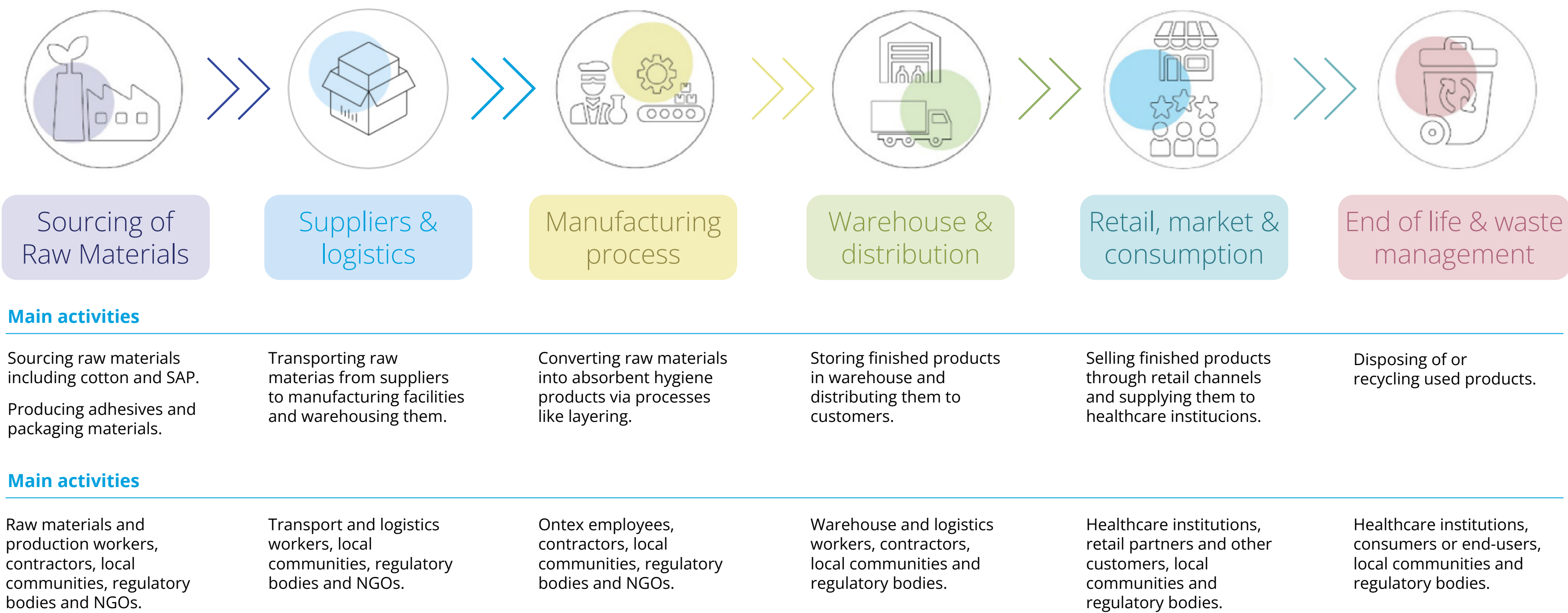


# Ontex Value Chain

Our value chain encompasses a comprehensive process that extends from the sourcing of raw materials to the responsible management of end-of-life waste.

Our value chain is designed to reflect our commitment to sustainability, quality, and innovation at every step.

For more information, please explore our [Annual Report 2024](#).





# How do we tackle Modern Slavery?

Our commitment and policies	09
Risk assessment and human rights due diligence	12
Risk assessment and management for prevention	16
Our approach to remediation	20
Potential risks of modern slavery in our operations and supply chains	21
Grievance and remediation mechanisms	22
Training and capacity building	25

02



# Our commitment and policies

We are committed to ensuring that Ontex has appropriate frameworks and processes in place to minimize the risk of modern slavery in our business operations and supply chain.

We have formal policies that are intended to promote ethical and legally compliant business practices.





# Our policies



**SUPPLIER CODE  
OF CONDUCT**



**ONTEX GLOBAL  
SUPPLIER  
AND VENDOR  
HANDBOOK**



**ETHICAL  
SOURCING  
REQUIREMENTS**



**CODE OF  
ETHICS**



**SUSTAINABILITY  
POLICY**



**DIVERSITY  
POLICY**



**HUMAN  
RIGHTS POLICY**



**SPEAK UP  
POLICY**



All Ontex employees and workers, as well as others performing work or services on behalf of Ontex, are required to adhere to our [Code of Ethics](#). Suppliers and their workers must adhere to the Ontex [Supplier Code of Conduct](#). Both policies are supported by additional policies, such as the [Speak Up Policy](#) and the [Human Rights Policy](#).

Segundo parrafo: These policies confirm our zero-tolerance to abusive and illegal practices. They support Ontex employees and non-employees in identifying situations where there may be hidden risks of modern slavery and labour abuses and encourage them to speak up about it.

Breaches to our Code of Ethics and Supplier Code of Conduct can be reported via various channels within the organization or through our (anonymous) online [‘Speak Up!’](#) web platform.

Our [Supplier Code of Conduct](#) outlines the corporate values and labour rights standards we expect from our suppliers, their representatives, and their sub-suppliers. In line with the UN Guiding Principles on Business and Human Rights, it sets

clear expectations on the prevention of forced and child labour across all stages of employment—ranging from ethical recruitment practices to effective remediation where violations occur.

The Code of Conduct for suppliers draws from internationally recognized standards and norms including the Universal Declaration of Human Rights, International Labor Standards, and the OECD Guidelines for Multinational Enterprises.

At a local level, additional policies are enforced to ensure compliance with relevant national legislations, for instance, in Australia we have the following policies: Recruitment & Selection Policy, Anti-discrimination & Employee equal opportunity policy, Workplace bullying policy and Grievance & dispute resolution policy. In UK we have the UK Recruiting Ex-offenders policy and we provide trainings about bullying and Harassment in the workplace 2024.



# Risk assessment and human rights due diligence







## Assessing and managing the risk

To identify, assess, prevent, and remediate the risk of modern slavery in our supply chain, we align our approach with internationally recognised legal and policy frameworks, including the [OECD Due Diligence Guidance for Responsible Business Conduct](#) and the [UN Guiding Principles on Business and Human Rights](#).

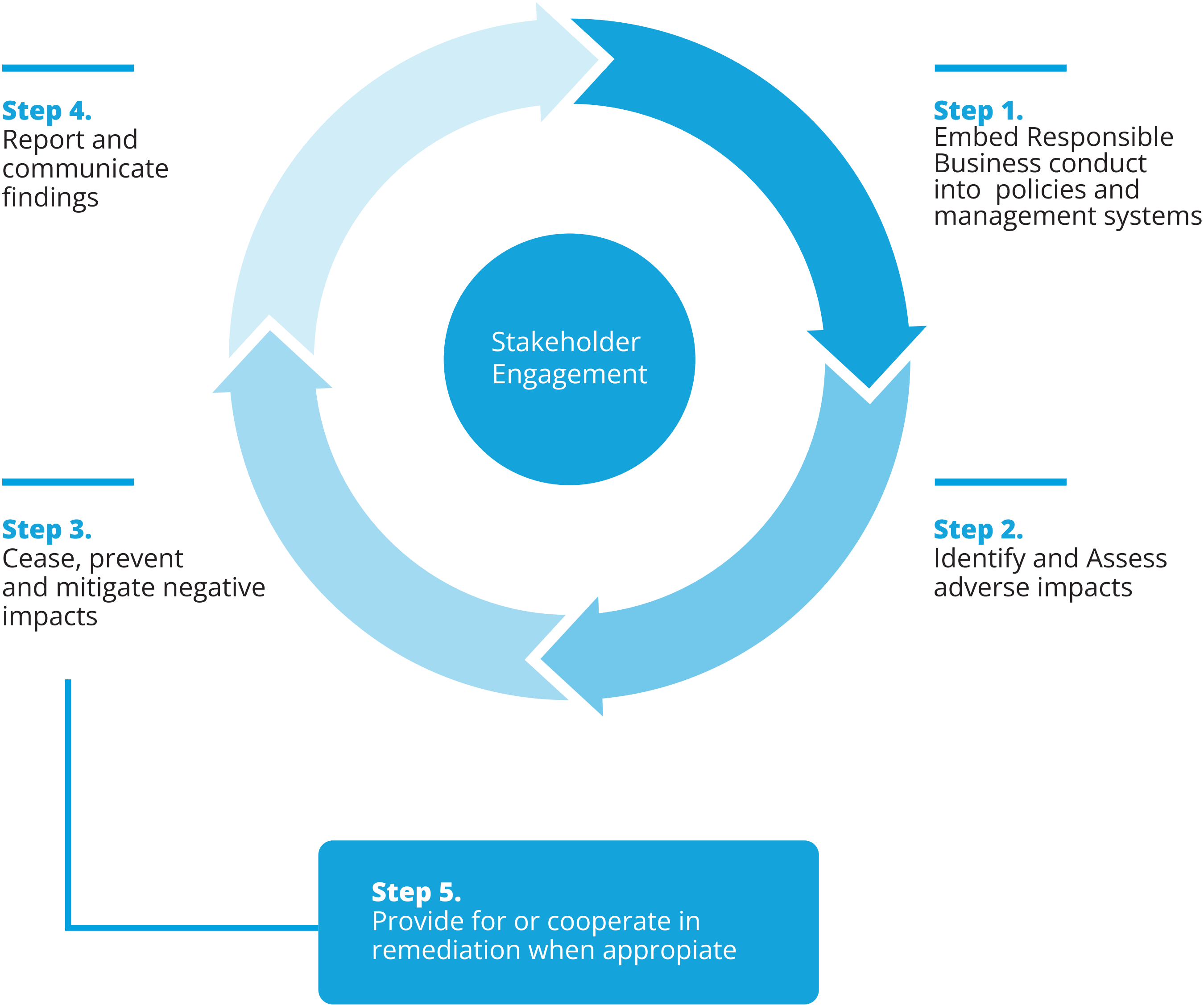
This exercise led us to develop a comprehensive, risk-based approach aligned with the Ontex Supplier Due Diligence Program and ethical sourcing requirements, establish a robust corporate governance framework, and strengthen our ability to identify and address potential adverse human rights impacts.



# Steps to identify and address risks related to modern slavery

Modern slavery and human trafficking are key focus areas within our due diligence framework. We have embedded specific measures to identify, assess, and address these risks across our operations and supply chain.

This includes integrating social audits, risk assessments, and supplier engagement processes to ensure that potential cases are detected early and handled responsibly.





# Steps for conducting human rights due diligence

- **Step 1: Embed responsible business conduct into policies and management systems.** Integrate respect for human rights and the environment into policies and management systems, in line with international standards (OECD Guidelines, UNGPs).
  - **Step 2: Identify and assess risks.** Conduct due diligence to identify actual and potential adverse impacts across operations and supply chains. Use stakeholder input, industry data, and on-site assessments. Prioritize based on severity and likelihood.
  - **Step 3: Cease, prevent and mitigate.** Take appropriate action to stop, prevent, or mitigate adverse impacts. Implement corrective measures and engage with affected stakeholders to support effective remedy.
  - **Step 4: Track and communicate.** Monitor the effectiveness of actions taken. Transparently communicate due diligence processes, risks identified, and progress made to relevant stakeholders.
  - **Step 5: Provide for or cooperate in remediation when appropriate.** Where we identify that we have caused or contributed to adverse human rights impacts, we are committed to providing for or cooperating in their remediation through legitimate processes. This includes engaging with affected stakeholders, supporting corrective action plans, and ensuring that grievance mechanisms are accessible, transparent, and effective.
- Collaboration and stakeholder engagement are central to every step of this process.

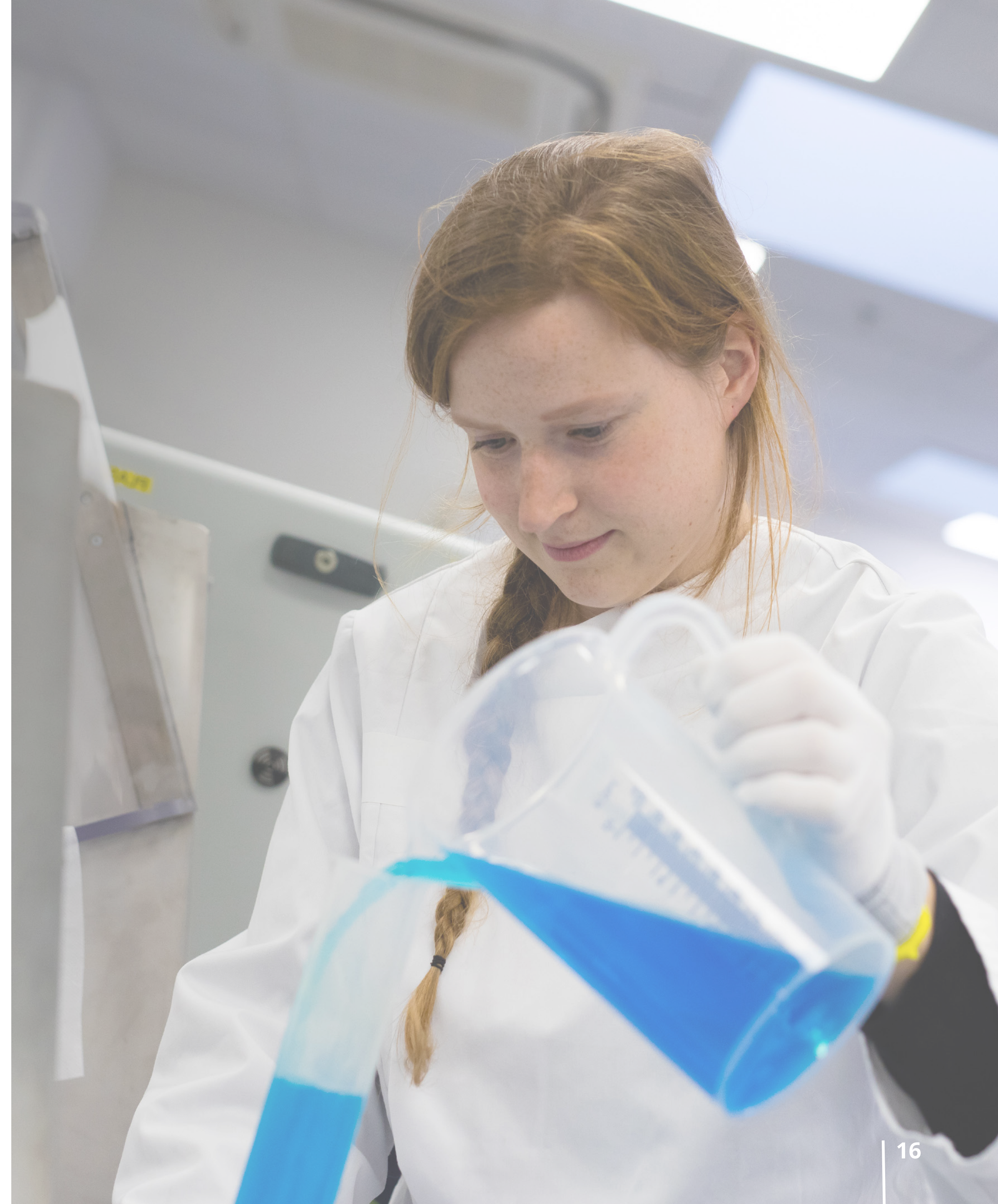


# Risk assessment and management for prevention



In 2024, we are strengthening our commitment to social compliance through our Supplier Due Diligence Program. We continue to apply a risk-based due diligence approach to identify, assess, and address actual or potential human rights impact in our upstream value chain, with particular focus on our own operations and raw material suppliers

To conduct risk assessment, we first map our value chain guided by SEDEX's risk assessment methodology, which enable us to prioritizes resources in regions with higher risks related to labor standards, health and safety, business ethics and environmental practices.

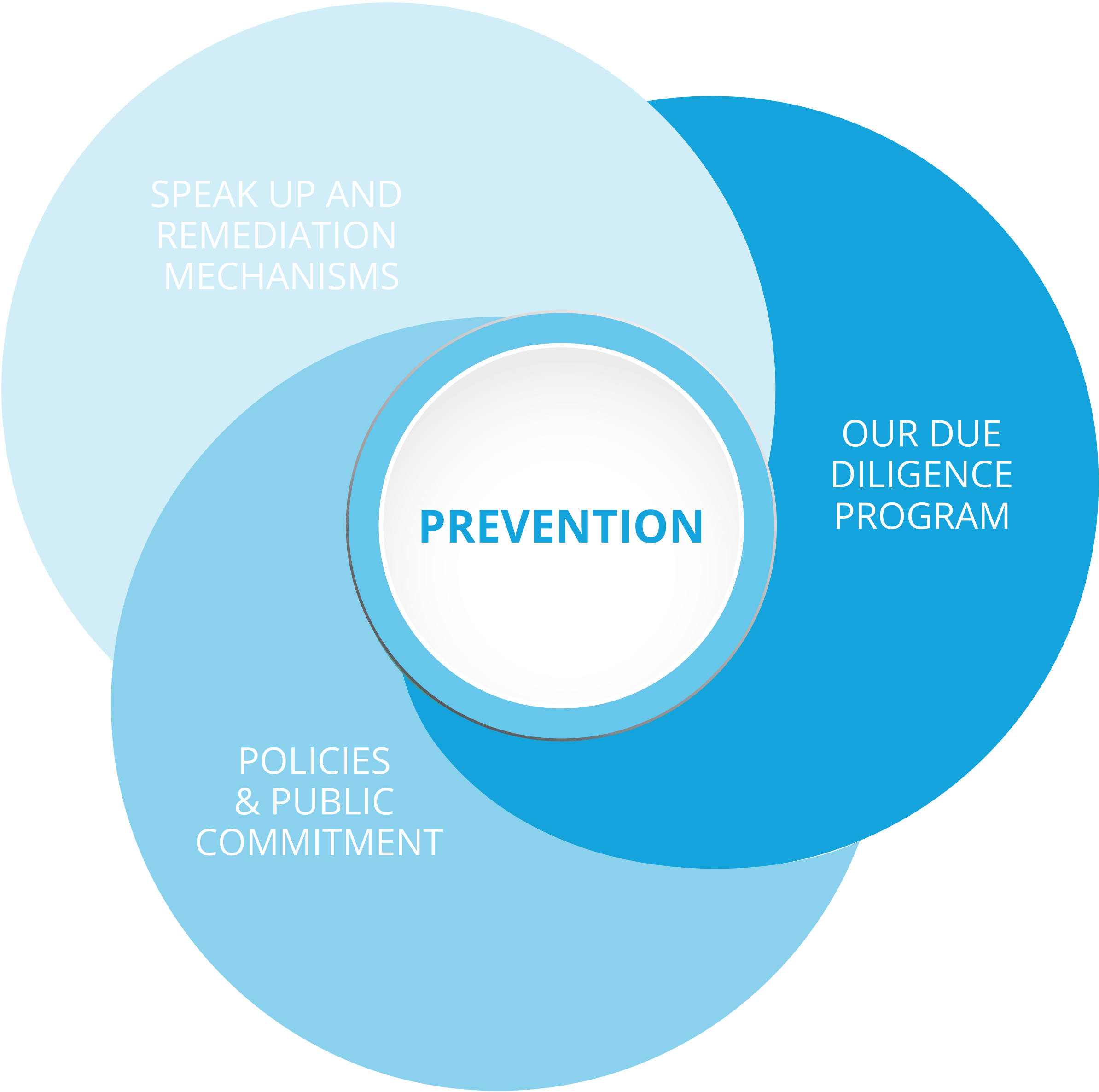




# Risk management approach for prevention

We understand that the risk associated with modern slavery, such as forced labor, human trafficking, or exploitative working conditions, can evolve over time and across regions. That's why we regularly review and update our approach to identifying and addressing these risks, to make sure it stays effective.

This risk mapping help us find areas where workers, whether directly employed by us or by third parties in our supply chain, may be most vulnerable to modern slavery. This allows us to tailor our actions and better protect the people connected to our business.





## Social audits as a key tool to identify Modern Slavery

Social compliance audits are a critical part of our approach to identifying and addressing modern slavery risks within our supply chain. In 2024, social audits were conducted at the majority of Ontex manufacturing sites, following the globally recognised SMETA (Sedex Members Ethical Trade Audit) social audit scheme. The SMETA audit entails a comprehensive assessment of labour rights, health and safety, environmental performance, and ethical business practices across our sites and supply chain.

The audits involve interviews with management, workers, and, where applicable, trade union representatives. Conducted by independent external auditors, they assess a range of human rights and labor practices, including discrimination, working hours, health and safety, as well as selected environmental performance.

As part of the Ontex Supplier Due Diligence Program, we require key suppliers located in high-risk countries to submit a valid social audit report within six months of starting business with us, in line with our Ethical Sourcing Requirements.

For suppliers located in high-risk countries, we conduct regular meetings to better understand their specific context and challenges. These conversations help us build mutual understanding, agree on next steps, and support suppliers in aligning with our ethical sourcing requirements. This ongoing dialogue is key to fostering transparency, building stronger partnerships, and driving continuous improvement throughout our supply chain.

In 2024, no business relationships with raw material suppliers were terminated due to social or sustainability-related non-compliances. For more information, please refer to our [2024 Annual Report](#).



## Internal control measures

- **ESG approval criteria for new suppliers and manufacturing sites.** All new suppliers and manufacturing sites are subject to ESG approval criteria as part of our onboarding and due diligence process. A second SAQ evaluation via Sedex is also required to help us identify potential risks early and assess their sustainability maturity and monitor the severity of the findings and the corrective action plans.
- **Supplier contracts.** All suppliers must sign the [Ontex Supplier Code of Conduct](#), included in our contracts and linked to our [Ethical Sourcing Policy](#).
- **Sustainability criteria in tenders.** Our purchasing tenders include a set of sustainability-related questions to ensure environmental and social factors are considered from the start.
- **Collaboration approach.** We hold regular meetings with suppliers to build trust, share expectations, and follow up on sustainability performance.
- **Ongoing supplier monitoring.** Sustainability is part of our regular supplier performance reviews. We evaluate social and environmental practices to better manage and reduce risks together.



# Our approach to remediation



## What is remediation

*"Where business enterprises identify that they have caused or contributed to adverse human rights impacts, they should provide for or cooperate in their remediation through legitimate processes" (UNGPs Principle 22).*

In the event a case of modern slavery is identified, most commonly through social audits, we commit to working with stakeholders to remediate the issue.

This includes providing clear guidance and raising awareness to ensure understanding of local regulations and international standards on compensation for affected workers and communities. We may perform investigations when necessary, and where remediation efforts fail, we escalate actions.

These measures apply to both our own operations and business partners, in line with the UN Guiding Principles on Business and Human Rights.





# Potential risks of modern slavery in our operations and supply chains

The complexity of global sourcing—particularly in the manufacturing sector—combined with varying labour standards across countries and the cross-border movement of goods, increases the potential risk of human rights violations.

This makes continuous monitoring, risk assessment, and preventive action essential components of our due diligence approach.



The following factors inform our ongoing human rights due diligence program

- **Geographic risk.** We prioritise countries identified as high-risk for modern slavery, such those listed in the *Global Slavery Index*.
- **Sector risk.** We pay close attention to industry sectors recognized as high-risk in both international and national guidance, including *ACSI guide on Modern Slavery Risks, Rights & Responsibilities report, 2019*.
- **Commodity and product risk.** Certain goods are known to carry a higher risk of being linked to forced or child labor, as highlighted in the *US Department of Labor's 2022 List of Goods Produced by Child and Forced Labor*.

In 2024, our risk mapping identified elevated risk in China, India, Egypt and Turkey, primarily related to working conditions, as recruitment practices or third-party labour agencies, and overtimes. While no cases of modern slavery were found, we increased monitoring these suppliers.



# Grievance & remediation mechanisms



Grievances, as defined by the *Global Reporting Initiative* (GRI), is perceived injustice evoking an individual's or a group's sense of entitlement, which may be based on law, contract, explicit or implicit promises, customary practice, or general notions of fairness of aggrieved communities.

At Ontex this definition is applied to concerns, problems, complaints, or other feedback related to our business, including environmental, social and governance topics. The raised grievances relate to a perceived violation of our values, policies and principles, as stated in our Code of Ethics and Supplier Code of Conduct.

At Ontex, we provide multiple channels for raising and addressing grievances, tailored to the needs of different stakeholder groups.





# Grievance & remediation mechanism

In line with our public commitments and adherence to international standards in human rights, at Ontex, we have implemented Grievance Mechanisms to address internal and external complaints regarding human rights and modern slavery potential violations. Various channels are available to address grievances, depending on the stakeholder group.

Employees are invited to report potential breaches of our Code of Ethics to managers, people of trust or using technology-driven mechanisms that allow for anonymous complaints to be sent, be duly registered and tracked up to a resolution. Each complaint is treated on a confidential basis and benefits from multi-functional resources to investigate and address potential breaches (in-house resources and, if needed, partnering with third parties – e.g. outside counsel and other specialists).

# Key stakeholders





General complaints and feedback from clients, customers and consumers concerning environment, social and governance matters are channeled via Ontex commercial community and registered via a special dedicated database. Ontex's Speak-Up line is also available for them to raise concerns via our website.

The grievances authorities, agencies, certification, and accreditation bodies raise are typically non-conformities and corrective and preventive actions as part of third-party social audits, certification audits and inspections.

There is a separate process for each of these channels outlined in dedicated Ontex procedures. The common denominator is that all of them entail acknowledgement, investigation, implementation of actions to sanction wrongdoings, prevent, mitigate, and eventually remediate. The effectiveness of the grievance mechanisms is being evaluated during annual management reviews. These reviews also serve as a platform for reporting to upper management on the number of raised grievances and spotlighting the most critical ones.

Ontex strives to provide effective grievance mechanisms while safeguarding confidentiality, anonymity, and protection of suppliers and employee whistleblowers as much as applicable law provides.





# Training & capacity building

Embedding responsible sourcing principles, business ethics and compliance involves fostering and disclosing a strong corporate culture that values integrity, managing relationships with suppliers ethically (including fair payment practices), protecting whistleblowers, combating bribery and corruption, and upholding high standards of ethics and compliance throughout the organization.

These principles are continuously enhanced through regular communication and interactive learning programs.







The Code of Ethics integrates our values concerning anti-competition, bribery, conflicts of interest, professional conduct, human rights, and sanctions against certain countries, among other key principles. To ensure a comprehensive understanding of the risks associated with modern slavery in our operations and supply chain, employees undergo periodic educational training sessions on these topics.

## Code of ethics trainings



Practicing  
business ethics

Conducting our global operations in a compliant & ethical way.

**2030 targets  
(vs. 2020 baseline)**

---

100% of employees regularly trained on Code of Ethics



Ontex employees are invited to participate in a mandatory annual Code of Ethics training, supplemented by ad hoc training for high-risk and supervisory roles. Progress is being made toward the 2030 goal of ensuring that 100% of the workforce is fully trained in the Code of Ethics and related compliance policies. To realize this goal clear internal targets and action plans were established in 2024, including:

- 1. Comprehensive training programs.** Regularly updated and accessible training modules covering key principles of the Code of Ethics and its application in daily operations.
- 2. Mandatory completion requirements.** Setting clear deadlines and tracking progress to ensure full participation and completion by all employees, regardless of role or location.
- 3. Localized content delivery.** Providing training materials in multiple languages and tailored to regional and cultural contexts to ensure relevance and accessibility for the company's global workforce.
- 4. Regular monitoring and reporting.** Establishing robust systems to track training participation rates.
- 5. Targeted interventions.** Implementing additional training or support to regions, teams, or roles that may face unique compliance challenges.





Measuring  
effectiveness

03



We are committed to regularly evaluating the effectiveness of our actions to identify, prevent, and address modern slavery risks across our operations and supply chain.

Over the year 2024, we focused on strengthening key areas of our due diligence program and tracking progress through the following measures:

- ✓ **Policy implementation:** Roll out the updated Ontex Code of Conduct policy, and enforcement of the updated Ethical sourcing requirements.
- ✓ **Risk-based supplied due diligence:** We continued our targeted risk assessment process, focusing on raw material suppliers operating in high-risk countries.
- ✓ **Supplier engagement:** We hosted a supplier webinar outlining our expectations on human rights and environmental responsibilities.
- ✓ **Audit follow-up:** At the plant level, we tracked the implementation of corrective action plans resulting from third-party social audits. Progress was monitored and documented to ensure timely resolution of non-compliances.
- ✓ **Ongoing supplier dialogue:** We held regular meetings with key suppliers in high-risk regions to better understand context-specific risks and agree on improvement plans aligned with our Ethical Sourcing Requirements.
- ✓ **Collaborative initiatives:** We participated in industry association efforts, like EDANA outlook and HIGG where we could interact with key suppliers.
- ✓ **Transparency and reporting:** We participate in industry associations such as EDANA Outlook, sustainability and policy, and Index forum, where we engage with key suppliers and collaborate on sustainability and social responsibility efforts.

Please explore our [Annual report 2024](#) for more information.

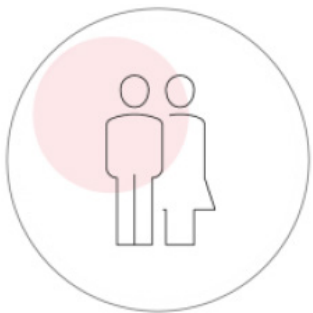




# Performance Highlights – Sustainable Supply Chain

Ontex promotes human rights across its value chain and is committed to improving living standards through responsible sourcing practices. In line with this commitment, the company has embedded sustainability deeply into its procurement strategy, reinforced by clear, outcome-oriented targets as part of its Supplier Due Diligence Program.

Ontex is committed to promoting human rights and raising living standards across its value chain. As part of the Company’s Supplier Due Diligence Program, Ontex continues to build a more responsible and transparent supply chain through data-driven targets and robust sustainability assessments.



Elevating living standards in our value chain

2030 targets (vs. 2020 baseline)	2024 status
100% raw materials supplier Code of Conduct signed by 2025.	100%
100% of high-risk suppliers' direct spend covered by sustainability assessments.	83%
100% of high-risk suppliers covered by a valid social audit report.	60%

Promoting human rights across our value chain

No cases of modern slavery were identified in our operations & supply chain in 2024.



Stakeholder  
engagement

04



Stakeholder engagement is at the core of everything we do. We prioritize local engagement, focusing on communities near our operations and offices, where we provide essential personal hygiene solutions. Our success is directly linked to the relationships we build with stakeholders, guiding our efforts to identify and engage with them effectively across all our sites.

We collaborate with suppliers and Ontex entities to ensure ethical sourcing and combat modern slavery. Recognizing our role in a broader ecosystem, we maintain open and direct communication with diverse stakeholders, fostering partnerships to drive sustainability.





# Stakeholders

# Engagement approach

Employees	Surveys, performance reviews, presentations, trainings, meetings, social events, email, and intranet.
Shareholders and investment community	Website, meetings, annual report, conferences, regular meetings and focus groups.
Customers	Surveys, meetings, industry events, information sessions, Ontex’s website and media communications.
Communities	Participation in community programs and events, industry events, our website, media communications and surveys.
Industry bodies	Industry conferences, meetings, and presentations.
Contractors and suppliers	Meetings, supplier webinars and surveys.

This statement is available on the homepage of the Ontex Group website and has been shared with relevant internal and external stakeholders.



# Consultation with Ontex entities & suppliers

## Internal stakeholder consultation across Ontex operations

Ontex maintains regular dialogue with key internal stakeholders across all our plants and group functions—including Procurement, Compliance, Legal, and local operational teams—to strengthen the implementation of our due diligence framework and ensure alignment with modern slavery legislation.

These consultations include:

- **Review of social audit findings.** We share and discuss audit results and human rights risks identified at the plant or supplier level to promote transparency and shared responsibility.
- **Corrective actions and follow-up.** Local teams are involved in the development and execution of corrective action plans, with clear roles assigned to ensure timely and effective remediation
- **Ongoing monitoring.** We engage plant representatives in tracking the effectiveness of actions over time, enabling local ownership and continuous improvement.
- **Capacity building.** Through open discussions with plant teams, we gather practical insights to refine our procedures, address implementation challenges, and enhance awareness of modern slavery risks.



# Consultation with Ontex entities & suppliers

## Supplier consultation

Consultation with suppliers is embedded within the Ontex Supplier Due Diligence Program. This includes a systematic approach to assessing and addressing human rights adverse impacts, including modern slavery risks through:

- **Third-party social audits.** We assess suppliers' practices against international standards and our ethical sourcing requirements.
- **Monitoring and remediation.** When findings arise, we collaborate with suppliers to implement corrective action plans and regularly monitor their effectiveness over time.

- **Capacity building.** We provide guidance on social auditing and responsible sourcing to strengthen suppliers' understanding and ability to meet our expectations.
- **Risk-based supplier engagement.** For suppliers located in high-risk countries, identified using our risk assessment methodology, we engage in targeted dialogue. This includes explaining our expectations, understanding local challenges, and jointly agreeing on corrective actions to ensure compliance with our due diligence program.

These ongoing consultations—both internal and external—ensure that Ontex's approach to modern slavery risk management is transparent, effective, and continuously improving. They form a critical part of our efforts to identify, prevent, and mitigate risks of modern slavery across our global operations and supply chain.



Future  
commitments

05



At Ontex, we're committed to working closely with our stakeholders to help prevent and respond to any unintended involvement in modern slavery. We do this by focusing on:

### Governance review

Review and assessment of the effectiveness of policies and procedures in identifying and minimizing modern slavery risks across our business and supply chains.

### Awareness & training

Raise awareness across our teams by providing practical training on our Code of Ethics and selected human rights topics like modern slavery.

### Business partners engagement

Engage with our suppliers and business partners in relation to our key salient human rights topics.

### Responsible procurement

Integrate risk management exercises to prevent and mitigate social and ethical risks within our supply chain.

### Risk identification

Perform ethical audits at our plants and update our risk due-diligence assessment of our operations and supply chain.

### Promoting reporting & whistleblowing

Provide and promote our anonymous speak up line to allow our internal and external stakeholders (including workers from our contractors and suppliers) to freely raise concerns about any actual or suspected unethical, unlawful, or undesirable conduct.



This Modern Slavery Statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and section 14 of the Australian Modern Slavery Act 2018, and covers the activities of Ontex for the financial year ending 31 December 2024.

This statement has been approved and endorsed by the CEO of Ontex, Gustavo Calvo Paz, in his capacity as the principal executive officer of Ontex, on June, 2025.

Ontex Group NV  
Korte Keppestraat 21, 9320 Aalst, Belgium  
<https://ontex.com>

**CONTACT DETAILS**

**Group Sustainability Team**

Elise Barbé  
[elise.barbe@ontexglobal.com](mailto:elise.barbe@ontexglobal.com)

**Ontex Australia**

Soo Chan Loo  
[soochan.loo@ontexglobal.com](mailto:soochan.loo@ontexglobal.com)

**Ontex UK**

Ashley Starbuck  
[ashley.starbuck@ontexglobal.com](mailto:ashley.starbuck@ontexglobal.com)



Laurent Nielly on behalf of Gustavo Calvo Paz  
President Europe, member of the Executive Management Committee





# Appendix



# Appendix I. Scope of the report

Manufacturing and services companies covered in  
Ontex Modern Slavery Statement 2024.

- |   |   |
|---|---|
| Ontex Australia Pty Ltd Australia                           | Ontex Mexico Operations S.A. de C.V.        |
| Ontex Manufacturing Pty Ltd Australia                       | Ontex Polska sp. z.o.o. Poland              |
| Eutima BV Belgium   | Ontex Romania Srl Romania                   |
| Ontex BV Belgium  | Ontex RU LLC Russia                         |
| Active Industria De Cosméticos S.A. Brazil                  | Ontex ES Holdco S.L. Spain                  |
| Falcon Distribuidora Armazenamento E Transporte S.A. Brazil | Ontex ID SAU Spain                          |
| Ontex CZ S.r.o. Czech Republic                              | Ontex Peninsular SAU Spain                  |
| Hygiène Medica SAS France                                   | Ontex Hygienic Spain, S.L. Spain            |
| Ontex France SAS France                                     | Ontex Tüketim. Ürn. San. ve Tic. AS Türkiye |
| Moltex Baby-Hygiene GmbH Germany                            | Ontex Ukraine LLC Ukraine                   |
| Ontex Engineering GmbH & Co .KG Germany                     | Ontex Health Care UK Ltd United Kingdom     |
| Ontex Healthcare Deutschland GmbH Germany                   | Ontex Retail UK Ltd United Kingdom          |
| Ontex Hygienartikel Deutschland GmbH Germany                | Ontex US Holdco, LLC USA                    |
| Ontex Inko Deutschland GmbH Germany                         | Valor Brands, LLC USA                       |
| Ontex Care GmbH Germany                                     | Ontex Operations USA, LCC                   |
| Ontex Mayen GmbH Germany                                    |   |
| Ontex Vertrieb GmbH Germany                                 |   |
| WS Windel-Shop GmbH Germany                                 |   |
| Ontex Manufacturing Italy S.r.l. Italy                      |   |
| Serenity Holdco S.r.l. Italy                                |   |
| Serenity Spa Italy  |   |

For more information, please refer to the [Annual Report 2024](#).



# Appendix II. Statements for compliance

## Compliance with Modern Slavery Act requirements

This Joint Statement is prepared in accordance with the criteria set out in the Australian and UK Modern Slavery Act. The table below outlines where these mandatory criteria are addressed in the report.

Mandatory reporting criteria	Section in the statement
Identify the reporting entity.	About this Statement // Approval.
Describe the structure, operations, and supply chains of the reporting entity.	Our business, structure, and operations.
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.	Risk assessment and due diligence.
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Supplier Engagement and social audit. Remediation and Grievance Mechanisms.
Describe how the reporting entity assesses the effectiveness of such actions.	Measuring effectiveness.
Describe the process of consultation with any entities that the reporting entity owns or controls.	Stakeholder Engagement.
Provide any other information that the reporting entity, or the entity giving the statement, considers relevant.	Modern Slavery Statement.



# Appendix III. Glossary

In the context of this report, modern slavery covers a set of specific legal concepts including forced labour, debt bondage, forced marriage, other slavery and slavery-like practices, and human trafficking

**Modern Slavery:** refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, or abuses of power. It takes many forms and is known by many names — forced labour, forced marriage, debt bondage, sexual exploitation, human trafficking, slavery-like practices, forced or servile marriage, and the sale and exploitation of children.

**Forced Labour:** is defined in the International Labour Organization Forced Labour Convention, 1930 (No.29) as “all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.” The ILO conventions C29 and C105 list precise exceptions under which labour can be imposed by state authorities.

**Human trafficking:** trafficking is defined in the UN Trafficking in Persons Protocol as involving three steps. 1. Recruitment, transportation, transfer, harboring, or receipt of persons;

2. by means of threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person; 3. with the intent of exploiting that person through: prostitution of others, sexual exploitation, forced labour, slavery (or similar practices), servitude, and removal of organs. The recruitment, transportation, transfer, harbouring, or receipt of a child for the purpose of exploitation shall be considered “trafficking in persons” even if this does not involve threat, use of force, or coercion.

**Due diligence in human rights and environment:** refers to the responsibility of governments, corporations, and other entities to take proactive measures to identify, prevent, mitigate, and remedy human rights abuses within their sphere of influence. It involves a systematic and ongoing process of assessing, addressing, and monitoring human rights risks and impacts associated with their activities, products, services, or operations.





# Modern Slavery Statement 2024

*Published June 2025*

