

Modern Slavery Statement for the Financial Year ending 31 December 2018

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Colart and its subsidiaries have taken and are continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Colart has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our Business

Colart's core activity is the development, manufacture and supply of artists' materials, in order to provide sustainable, creative tools and services to release pure expression. The largest business function (measured by the number of people employed) is manufacturing. Colart operates 4 manufacturing sites: two in the UK, one in France and one in China, distributing its products in approximately 120 countries and working with over 700 suppliers covering production and non-production spend.

Our High Risk Areas

Some of our raw materials are sourced from mines, in particular certain pigments used in our product ranges. Our policies pay attention to standards for suppliers.

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include:

1. **Code of business conduct:** Our over-arching Code of Business Conduct sets out our standards for how we behave as an organization and how we expect our employees and suppliers to act. This includes provisions on Modern Slavery in our supply chain, as well as other ethical business practices like the prevention of bribery and corruption.
2. **Whistleblowing policy:** We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
3. **Recruitment policy:** We operate a robust recruitment policy for all employees to safeguard against human trafficking or individuals being forced to work against their will.

Our Suppliers

Colart operates a supplier assessment policy and is currently working on a preferred supplier list. We conduct due diligence on suppliers before allowing them to become a preferred supplier, which includes our own information gathering, data gathering from SEDEX (described in more detail below), and online searches to exclude suppliers who have been convicted of offences relating to modern slavery.

SEDEX which is an online data base for facilitating access to information on the following pillars:

- Labour Standards
- Health and Safety
- The Environment
- Business Ethics

Each supplier is required to complete a Supplier Assessment Questionnaire based on the above pillars. This as well as inherent risk and any social audits are used as part of a risk assessment tool, which allows us to highlight potential risks.

Once the due diligence is complete, a risk score is assigned to each supplier based on the results. We are working to implement a system of site visits to suppliers with a higher risk score which, once implemented, will allow us to make assessments about compliance first hand. The combination of the above tools will allow us to identify and investigate risks fully and to exclude suppliers who do not comply with our policies (and to report unlawful practices to the authorities, where appropriate).

Training

We are in the process of implementing regular training for our procurement/buying teams to enable them to identify risk factors for modern slavery in our supply chain and to make assessments about whether suppliers are in compliance with our policy and the law.

Update

We continue working with SEDEX to ensure that we have traceability in our supply chain, we also accept alternative programs like BSCI and comprehensive internal programs. All new suppliers have a robust RFI (request for information) they are required to complete.

Our focus in 2019 will be to continue working with our suppliers and focusing on high risk areas like raw materials.

Approval for this statement

This statement was approved by the Board of Directors on 29th March 2019

Name Dennis van Schie

Signature



Date 29/03/2019