

Modern Slavery Statement

Binney & Smith (Europe) Ltd., strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We are committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organization or in any of our supply chains.

Crayola Supplier Code of Conduct

Caring about others is deeply embedded in Crayola's culture. That's evident in our products, of course, but it's also clear in the countless ways our company and employees bring caring commitment to the community. Good corporate citizenship is a value established by our founder and embraced by the company leaders who have followed. Crayola's commitment to corporate citizenship extends to caring for the world around us by acting as a good steward of the environment, and by establishing a Supplier Code of Conduct setting business practice expectations of our suppliers domestically and around the world.

Crayola has communicated these expectations of our direct suppliers to ensure that materials incorporated into our products comply with all applicable laws regarding slavery and human trafficking. Direct suppliers are trained to identify supply chain risks and expected to mitigate these risks within their material and component supply chain. Additionally, Crayola employees who have the responsibility for supply chain management are trained to identify and mitigate risks associated with all forms of forced labour.

Monitoring Enforcement

Crayola uses both third party monitoring firms and internal resources to monitor adherences to its Supplier Code of Conduct in the manufacture of our products. Recent third party checklist introduced additional requirements on Modern Day Slavery and the Employer Pays Principle, including strengthened checkpoints which explicitly prohibit the charging of recruitment fees, additional protections for directly-recruited workers and new requirements governing the use of labour brokers.

Confidential interviews between the auditor and the workers are a key component of the auditing process as is the review of compensation records, working hours and hiring practices. If any evidence is found suggesting that slavery or human trafficking may be present, Crayola will conduct a full investigation. This may include further auditing of sub-tier suppliers and labour recruitment agencies, and/or engaging with non-governmental organizations with specialized expertise in identifying these types of abuses.

If abuses are identified, Crayola will engage in a remediation plan that may include collaboration with other customers doing business with the supplier, further engagement with NGO's, or working with appropriate governmental bodies. While Crayola may choose to end the business relationship with these suppliers, the remediation will continue until the issue is resolved.

For and on behalf of Binney & Smith (Europe) Ltd



Scott Yeaw

General Manager, EMEA

Date: 27th November 2018

