

## Modern Slavery Statement - 2023

Binney & Smith (Europe) Ltd. ("Crayola") 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 safeguarding our organization and supply chains from modern slavery.

### **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 to our direct suppliers so that materials incorporated into our products comply with 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 chains. Additionally, Crayola employees who have the responsibility for supply chain management are trained to identify and mitigate risks associated with forced labour.

### **Monitoring Enforcement**

Crayola uses both third party firms and internal resources to audit adherence to our Supplier Code of Conduct in the manufacture of our products. Third party checklists 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 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. We will provide reasonable support for the supplier to resolve the issue and provide reasonable timing to implement the resolution. If a resolution is not implemented Crayola may choose to end the business relationship with these suppliers.

The above constitutes Binney & Smith (Europe) Ltd. ("Crayola") modern slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2023.

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



Ben Thomas  
Chief Commercial Officer  
Date: July 29, 2024

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