

Canadian Statement Against Forced Labour and Child Labour in Supply Chains
pursuant to an Act to enact the Fighting Against Forced Labour and Child Labour in
Supply Chains Act and to amend the Customs Tariff,
referred to as Canada’s “*Modern Slavery Act*” (the “**Act**”)
for the year ending December 31, 2023

1. INTRODUCTION

This is a statement made by Combe Incorporated (hereinafter “Combe”) in respect of the Act, as referenced above.

Combe is incorporated pursuant to the laws of Delaware, USA, with its principal place of business in White Plains, New York, USA.

2. REPORTING ENTITY

Combe is reporting on behalf of itself.

3. STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

Combe is a United States based manufacturer of personal care products that exports goods for sale in Canada. As part of Combe’s manufacturing, it purchases raw materials and packaging components from a variety of third party suppliers. More than eighty percent (80%) of Combe finished goods are manufactured in our own U.S.-based manufacturing plants.

Given the nature of Combe’s business, we operate in a highly regulated industry. Maintaining a standard of excellence in our products is of the utmost importance. We expect our employees, as well as our suppliers, to act in compliance with all applicable laws, and in accordance with our internal policies and practices.

Forced labour and child labour are strictly prohibited within Combe’s business and operations. Combe’s internal Employee Handbook requires adherence to applicable labour laws. In connection with this standard of excellence, Combe works closely with trusted suppliers, many with whom we have longstanding relationships. Many of these suppliers service a large variety of companies in the personal care industry. Prior to being engaged by Combe, each supplier is required to fill out a Supplier Questionnaire, which requires the supplier to provide information regarding, among other things:

- “Know-Your-Counterparty” (KYC) information including company name, service address and primary contact information;
- The supplier’s business, including the number of years in operation, the services provided and parent company of the supplier;
- Personnel and facilities;
- Any outsourcing of services to contractors, subcontractors or outside suppliers;

- Registration with and inspection by certain regulatory authorities;
- Participation in supply chain security programs administered by certain customs administration authorities (e.g., the supplier's participation in the Trade Partnership Against Terrorism);
- Quality controls;
- Material identification and traceability; and
- Document controls.

Suppliers are required to sign and return the questionnaire. Revisions to the questionnaire are tracked by Combe and copies are maintained internally.

In addition to the questionnaire, a Supplier Approval Form must be reviewed and signed by both the Quality and Purchasing functions within Combe. Combe maintains a database containing both the completed Supplier Questionnaires and Supplier Approval Forms. Performance of suppliers is monitored on an ongoing basis. Combe also maintains the right to audit our suppliers. Such audits of suppliers are conducted on an as-needed basis.

4. POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO FORCED LABOUR AND CHILD LABOUR

In addition to the Supplier Questionnaire and the Supplier Approval Form, Combe also provides a Supplier Code of Conduct (the "Supplier Code") which requires, among other things, that Combe's suppliers, and sources within the supply chain, comply with all applicable laws (including laws pertaining to forced labour and child labour). Moreover, the Supplier Code specifically prohibits child labour and forced labour, and requires humane treatment in the workplace and upholding of human rights. Suppliers are required to adopt and maintain internal systems that support compliance with the Supplier Code. The Supplier Code is made available online.

Pursuant to the Supplier Code, Combe has the right to audit compliance either directly or through an independent third party, and reserves the right to terminate any arrangement or agreement with any supplier that cannot demonstrate compliance with the Supplier Code and/or fails to take required corrective actions.

As noted above, Combe operates in a highly regulated industry. Accordingly, Combe often undertakes a formal Request For Proposal ("RFP") process when sourcing opportunities arise. When selecting suppliers, through a formal RFP or otherwise, Combe considers reputation, capabilities, and costs, among other things, and seeks out suppliers of the highest integrity.

Additionally, pursuant to Combe's standard form of Purchase Order, suppliers agree to conform their operations to the Supplier Code, and Combe has the right to infer that any shipment to Combe is a certification from the supplier that it is in compliance with the Supplier Code.

Combe's standard form Purchase Order also contains representations covenanting compliance with applicable laws, including relevant labour standards. Additionally, certain of Combe's agreements with suppliers contain representations covenanting compliance by the supplier with applicable laws, including, in some cases, specific prohibitions against the use of forced labor or child labour.

5. PARTS OF BUSINESS AND SUPPLY CHAINS THAT CARRY A RISK OF FORCED LABOUR AND CHILD LABOUR AND STEPS TAKEN TO ASSESS AND MANAGE THAT RISK

Combe has not identified any incidents or specific risks of forced labour or child labour in its supply chains. Combe is not aware of any such issues with respect to its suppliers and, as outlined in this report, has taken various steps to mitigate this risk where it may exist. Combe would take swift action up to and including termination with a supplier if it were to learn of allegations or incidents of forced labour or child labour in the supply chain of said supplier.

6. MEASURES TAKEN TO REMEDIATE FORCED LABOUR AND CHILD LABOUR

Combe has not identified any incidents of forced labour or child labour in its supply chains. Accordingly, no measures have needed to be undertaken to remediate forced or child labour in Combe's supply chains.

7. MEASURES TAKEN TO REMEDIATE LOSS OF INCOME TO MOST VULNERABLE FAMILIES THAT RESULT FROM MEASURES TAKEN TO ELIMINATE USE OF FORCED LABOUR AND CHILD LABOUR

Combe has not identified any incidents of forced labour or child labour in its supply chains. Accordingly, no measures have been required to eliminate forced or child labour in Combe's supply chains. As no such measures have been required or undertaken, no measures have been required in order to remediate any resulting loss of income.

8. TRAINING PROVIDED TO EMPLOYEES ON FORCED LABOUR AND CHILD LABOUR

All employees are provided with standardized training at the time they are engaged, which includes their obligation to act ethically on behalf of Combe. Employees are also provided with a copy of the Employee Handbook, and are required to review that Handbook as a condition of their employment.

9. HOW ENTITY ASSESSES ITS EFFECTIVENESS IN ENSURING THAT FORCED LABOUR AND CHILD LABOUR IS NOT BEING USED IN ITS BUSINESS AND SUPPLY CHAINS

Combe actively considers the important role that business ethics – our own and the practices of our suppliers – play as part of our internal risk considerations. Combe is in the process of examining and developing various policies, processes and technical deliverables to more directly assess the effectiveness in ensuring that forced labour and child labour are not used in its supply chain.

ATTESTATION

This report has been approved by the Board of Directors of Combe Incorporated on its own behalf.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above. For clarity, I am providing this attestation in my capacity as a Senior Vice President, General Counsel and Corporate Secretary of Combe Incorporated, and not in my personal capacity.

Signature:  _____

Name: Anthony M. Santini

Title: Senior Vice President, General Counsel and Corporate Secretary

I have authority to bind Combe Incorporated

Date: May 22, 2024