



Forced Labour & Modern Slavery Statement for Financial Year 2023

Who We Are

Founded in 2014 in sunny Southern California, Raw Sugar is an aspirational lifestyle brand on a mission to promote clean and healthy living through products that are good for the body and nourish the soul. We are committed to providing the highest quality earth-friendly hair and personal care products at a price that is accessible to all, supporting our founders' belief that everyone deserves products that make them feel clean, beautiful, empowered, and loved from the outside in.

What We Do

Raw Sugar focuses on creating affordable clean and natural products made with Cold Press Extracts, including sulfate-free shampoos, body washes, lotions and more. Raw Sugar's products are made and filled in the United States by contract manufacturers equally committed to clean beauty and healthy living.

We distribute throughout the United States through our e-commerce site and Amazon, as well as major retail outlets such as Walmart, Target, CVS, Walgreens, amongst others. At the end of 2023 we began importing product into Canada, and in February 2024 we launched our hair and body essentials in Shoppers Drug Marts in all provinces.

These products use a mixture of local and foreign raw materials, including:

- Nourishing oils and extracts, such as those from coconut, jojoba seeds, sunflower seeds, aloe, arrowroot powder
- Synthetic raw materials, such as caprylic/capric triglyceride, magnesium hydroxide, corn starch, glycerin, and others
- Packaging components such as plastic tubes, bottles, jars, pumps, and caps made from 30% Post Consumer Recycled (PCR), and FSC-certified paper on our bar soaps and deodorants

Our Supply Chains

Raw Sugar imports and wholesales finished goods from our co-manufacturers in the United States.



Key raw materials and components for our products are sourced from the following locations:

- United States
- Canada
- Germany
- France
- Spain
- Brazil
- Belgium
- Philippines
- Sri Lanka
- Malaysia
- India
- Indonesia
- Ukraine
- Mexico
- West Africa
- Thailand
- Israel
- Chile
- China

Our supply chain also includes extensive local and global supply chains for goods, materials, and services including logistics service providers, freight forwarders, shipping companies, and warehouse pick-and-pack services. Our supply chain also includes goods and services that support our business activities such as advertising and creative agencies, electronics, financial and legal assurance, and other consulting partners.

How We Work to Ensure Our Supply Chains Are Free of Forced Labour and Child Labour

1. Our Policies

In 2024, Raw Sugar began implementing a Supplier Code of Conduct which establishes the ethical and social standards required for suppliers that wish to supply materials and do business with Raw Sugar. Our key suppliers have been asked to acknowledge and sign our Supplier Code of Conduct, which explains and prohibits the use of forced and child labour and sets out Raw Sugar's commitment to sourcing ethically produced raw



materials. This policy also sets out punitive measures and consequences for breaches to this policy. We aim to have this completed before the end of Q3 2024.

Raw Sugar also has a Whistleblower policy which provides an avenue for any stakeholder, employee, contractor, or supplier to raise concerns about any suspected improprieties relating to malpractices, violations of the law, breaches of the Code of Conduct, or other unethical matters which could involve business partners, vendors, contractors, or employees.

2. Our Due Diligence Processes

All Raw Sugar contract manufacturers undergo rigorous qualification and monitoring for product safety and quality. Raw Sugar-sourced materials are qualified via extensive documentation processes. Contract manufacturer-sourced materials are qualified by each manufacturer, and their qualification programs are reviewed by Raw Sugar.

3. Employee Training on Forced Labour and Child Labour

Annual training provided to our employees that relate to responsible and ethical sourcing is currently in the planning stages. We intend to implement this training before the end of 2024.

4. How We Monitor Ourselves and Our Suppliers and Assess Effectiveness

No actions have been taken to assess ourselves and our suppliers' effectiveness in preventing and reducing risks of forced labour and child labour in their activities and supply chains. We intend to begin further internal engagement and with our suppliers on improved monitoring in Q3 2024.

We Are Aware of Risks of Forced Labour or Child Labour Use in Global Supply Chains

We consider the risk of modern slavery within Raw Sugar to be extremely low. This is because all persons involved in our day-to-day operations are employed by or in a formalized consulting relationship with Raw Sugar and are subject to background checks.

We recognize that we have lower visibility and control over our manufacturing and distribution partners, as well as less control and visibility over raw materials sourced on our behalf by our contract manufacturers, in particular any materials sourced from countries with a higher risk or incidence of modern slavery or forced labour.



We currently procure several packaging and raw materials from China, which has a higher vulnerability to modern and forced labour. In terms of the prevalence of modern slavery, China ranks 111th globally and 19th within Asia and the Pacific, according to the 2023 Global Slavery Index by WalkFree (an international human rights group focused on the eradication of modern slavery in all its forms). Whilst forced labour has not been historically prevalent in the packaging and ingredient sectors that we source our materials from, we note that some risk remains.


How We Have Addressed Reported Risks or Use of Forced Labour or Child Labour in our Supply Chains

Raw Sugar has to date not faced situations of forced labour or child labour and has therefore not needed to remedy or rectify such situations.

Attestation

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.

Michael Marquis
Chief Executive Officer, Raw Sugar LLC.

 May 31, 2024

I have the authority to bind Raw Sugar LLC.