U.K. MODERN SLAVERY ACT OF 2015

July 30, 2015

The U.K. Modern Slavery Act of 2015 is focused on eliminating slavery and human trafficking from global supply chains. This act requires companies that do business in U.K. to disclose what efforts their organizations engage in to ensure their supply chain is free of human rights violations.

Jarden Consumer Solutions (Europe) Limited’s Responsibility

Jarden Consumer Solutions (Europe) Limited ("JCS Europe") does business in the U.K. and has implemented comprehensive corporate social responsibility programs to ensure that we operate within the highest standards of business ethics and in accordance with all applicable laws and regulations.

As good corporate stewards, JCS Europe will not work with any suppliers that engage in human trafficking and/or slavery. As part of our comprehensive social responsibility program, we conduct audits which serve as a starting point to understand suppliers’ compliance infrastructure. Issues such as human trafficking, slavery, forced/prison labor and child labor are zero tolerance violations and JCS Europe will not conduct business with suppliers having such practices. The audits allow us to verify that all labor at the factories supplying products to JCS Europe is voluntary.

Verification:
Verification of social responsibility standards consists of:

- Both internal and external audits
- Random onsite visits at factories
- Worker Interviews

Certification:
Certification of compliance is required:

- Key program documents such as our Code of Conduct and Supplier Handbook outline our strict social responsibility requirements
- All Suppliers that sign the Code of Conduct must adhere to our comprehensive social responsibility requirements and are to follow all law and regulations in the jurisdictions in which our products are manufactured
Training:
To improve our supply chain our businesses work with our suppliers on an ongoing basis through:

- Supplier training/ development; capacity building; root cause analysis and onsite visits to ensure our suppliers are meeting long-term compliance objectives
- Various forms of training to include: in person; roundtables; webinars and e-learning

Remediation:
Where necessary, remediation may include:

- Comprehensive corrective action plans developed with suppliers to create long-term sustainable improvements
- Root-cause analysis to drive issue resolution

For additional information about our Corporate Social Responsibility program or to view our Code of Conduct or Supplier Handbook please click here.