

matrix

Modern Slavery Statement

2024

Certified



Corporation

Scope

This Statement reflects the steps **matrix** has taken to prevent modern slavery and human trafficking in the financial year ending 31st December 2024. It covers the operations and Tier 1 product suppliers of **matrix** APA and Viaderm t/a **matrixlabs**, a fully owned subsidiary of **matrix** APA. **matrixlabs** is still in the process of being fully embedded into our business, including integration of its suppliers into our human rights due diligence programme. We will continue to share our progress each year in our Modern Slavery Statement.



Contents

03	Introduction
06	About matrix
08	Governance & Policies
10	Our Supply Chain
11	Modern Slavery Risks
16	Training & Capacity Building
17	Workers Voice

Letter from our Founder



Since our inception, **matrix** has always been a people and values-first business, a mindset that has only strengthened over the last 30 years. That doesn't just mean thinking about our own team; it extends to everyone we work with, particularly the workers in our supply chain, without whom we would not exist.

We are fortunate enough to have an experienced and dedicated team with many incredible individuals who make the matrix magic happen. Without these people matrix wouldn't be the business it is today. We're proud to be a values-first company, where people are as important as profit, and this belief drives everything we do.

Protecting and respecting human rights has always been at the core of how we do business. We recognise our responsibility to uphold the basic rights and freedoms of every individual involved in our value chain—regardless of race, gender, nationality, or any other status. We fully support the legislation put in place for the prevention of modern slavery and human trafficking, including the UK Modern Slavery Act (2015).

After almost 30 years of predominately sourcing from the Far East, this year we have broadened our supply base in the UK, with the integration of **matrixlabs**, our UK-based manufacturing facility. This is an exciting new chapter for **matrix** as we expand our local supply chain in the UK and Europe.

We acknowledge that modern slavery is a deep-rooted, global issue that no business can solve alone. That's why we truly value the relationships we have with our trusted partner, the Ethical Trading Initiative (ETI). Their support, expertise, and community have been invaluable as we navigate these challenges together with other businesses on the same journey.

Tackling modern slavery is complex, but we are fully committed to proactively doing our part. By working collaboratively with our partners and ensuring that every part of our business upholds our values, we aim to protect and respect the rights of everyone across our global supply chain.

Charlie Bradshaw,
Founder

What is Modern Slavery?

Modern slavery is a global problem that directly affects over 50 million people today. It refers to situations of exploitation in which a person possesses or controls another person in such a way as to significantly deprive that person of their individual liberty, with the intention of exploiting that person through their use, profit, transfer or disposal.

Modern slavery is an overarching term used to describe its various forms:

Slavery

a situation where a person exercises (perceived) power of ownership over another person.

Human Trafficking

a process of bringing a person into a situation of exploitation through a series of actions, including deceptive recruitment and coercion.

Forced & Compulsory Labour

any work or services which people are not doing voluntarily, and which is exacted under a threat of some form of punishment.

Bonded Labour

any work or services demanded as a means of repayment of a debt or a loan.



Our 2024 highlights

STARTED MAPPING OUR TIER 2 SUPPLIERS, OVER

160

MAPPED TO DATE

147 EMPLOYEES WORKING IN 5 COUNTRIES

66% FEMALES 34% MALES

IMPLEMENTED A NEW SUPPLIER ONBOARDING PROCESS

PARTICIPATED IN THE ETI RESPONSIBLE PURCHASING PRACTICES INITIATIVE

£59m

TURNOVER

MODERN SLAVERY TRAINING UNDERTAKEN BY OUR PEOPLE TEAM, DELIVERED BY STRONGER TOGETHER



12

YEARS OF ETI MEMBERSHIP

730

TRAINING HOURS DELIVERED TO FACTORY WORKERS BY matrix SOCIAL RESPONSIBILITY TEAM ENGAGING WITH OVER

381

MANAGEMENT & PRODUCTION STAFF

31

TIER 1 PRODUCT SUPPLIERS

110

DAYS SPENT VISITING OUR SUPPLIERS' FACTORIES CONDUCTING AUDITS, DELIVERING TRAINING SESSIONS, FOLLOWING UP ON CORRECTIVE ACTION PLANS, & SUPPORTING WITH ONGOING IMPROVEMENTS

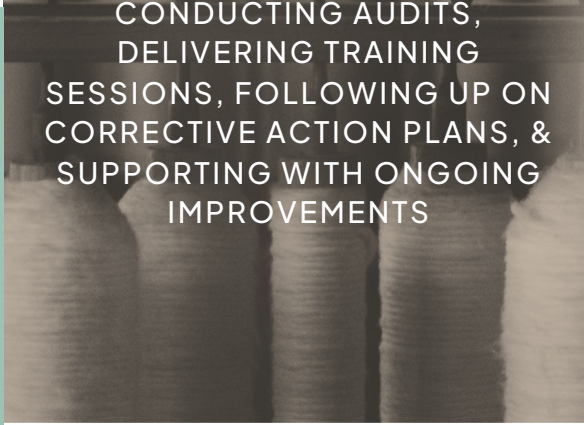
100%

OF OUR TIER 1 SUPPLIERS IN CHINA, VIETNAM & CAMBODIA THIRD-PARTY AUDITED

12,363

PEOPLE WORKING IN OUR TIER 1 PRODUCT SUPPLY CHAIN IN CHINA, CAMBODIA & VIETNAM

INTRODUCED NEW KPIS & QUARTERLY REPORTING FOR OUR FACTORIES IN CHINA & CAMBODIA



237

HOURS OF TRAINING COMPLETED BY OUR ESG TEAM



Our Commitment

As long-standing members of the ETI, we are committed to working collaboratively to protect and respect the fundamental human rights of our employees, suppliers and workers in our value chain by adhering to the [ETI Base Code](#) together with the [International Labour Organisation \(ILO\) conventions](#) upon which the Code is based.

We are driven by our purpose to create amazing products, while also reducing our environmental footprint and positively impacting society. Through the following set of practices, we aim to improve the sustainability of our products, the life of every worker, the efficiency of our facilities and the experience of everyone in our supply chain:

Partnerships

We are firm believers in the power of partnerships. We work together with our stakeholders to build long-term, collaborative relationships. We recognise the importance of respecting our partners through mutually agreed responsible purchasing practices.

Environmental Sustainability

We commit to doing our best to reduce our environmental impact by responsibly designing, sourcing and manufacturing our products to help preserve our natural environment and use resources efficiently.

Supply Chain Transparency

We are focused on mapping our supply chain beyond Tier 1 to gain better visibility of salient issues, ensuring we are truly protecting all workers within our value chain.

Social Responsibility

Our aim is to support our factories to create a positive social impact. Our 'beyond' audit approach is designed to empower our suppliers to follow high standards of ethical practices.

Continuous Improvement

We commit to continuous evaluation and improvement of our responsible sourcing practices through training, investment in technology and collaboration with our suppliers, peers and NGOs with the guidance of the ETI.

Our business is structured around three areas:

matrixbrands

We are creating a diverse portfolio of our own meaningful brands built upon innovative formulations, visionary co-founders and pioneering technologies. We also work closely with our partners to develop and grow amazing brands and product ranges through our Private Brands service.

matrixtravel

We partner with great British brands to design and manufacture luxury sleepwear, bedding and amenity kits for airlines.

matrixlabs

We have a full-service personal care, Good Manufacturing Practice (GMP) accredited manufacturing facility, complete with a research and design laboratory in the UK (Viaderm t/a matrixlabs).

About matrix

We are an innovative brand platform. Creating and growing amazing health and beauty brands through our unique, vertically integrated, services.

Our team is based across the UK, US, Hong Kong, China and Dubai, and our values of drive, ownership, curiosity and relationships are the common thread connecting our team, wherever we are in the world.



Modern Slavery Governance

Co-CEOs

Overall responsibility for human rights and modern slavery risk assessment and due diligence. Approve Modern Slavery Statement prior to being published.

People & ESG Director

Oversees our people and impact strategies, including our human rights and modern slavery programmes of work.

Social Responsibility & ESG Teams

Our Social Responsibility and ESG teams are responsible for addressing modern slavery and human and labour rights in our supply chain, including through implementing our Beyond Audit programme, conducting risk assessments and engaging with our suppliers.

We have a permanent presence on the ground in our key sourcing regions of China and the UK, helping us build open and transparent relationships with suppliers, which allows us to react quickly to provide remediation and support in resolving issues.

Our Wider Business

We hold regular meetings internally across teams, and externally with our suppliers to discuss performance metrics, priorities and issues. These are an essential forum for ensuring responsible purchasing and ethical sourcing practices are adhered to by both our teams and suppliers.



Our Supplier Code of Conduct

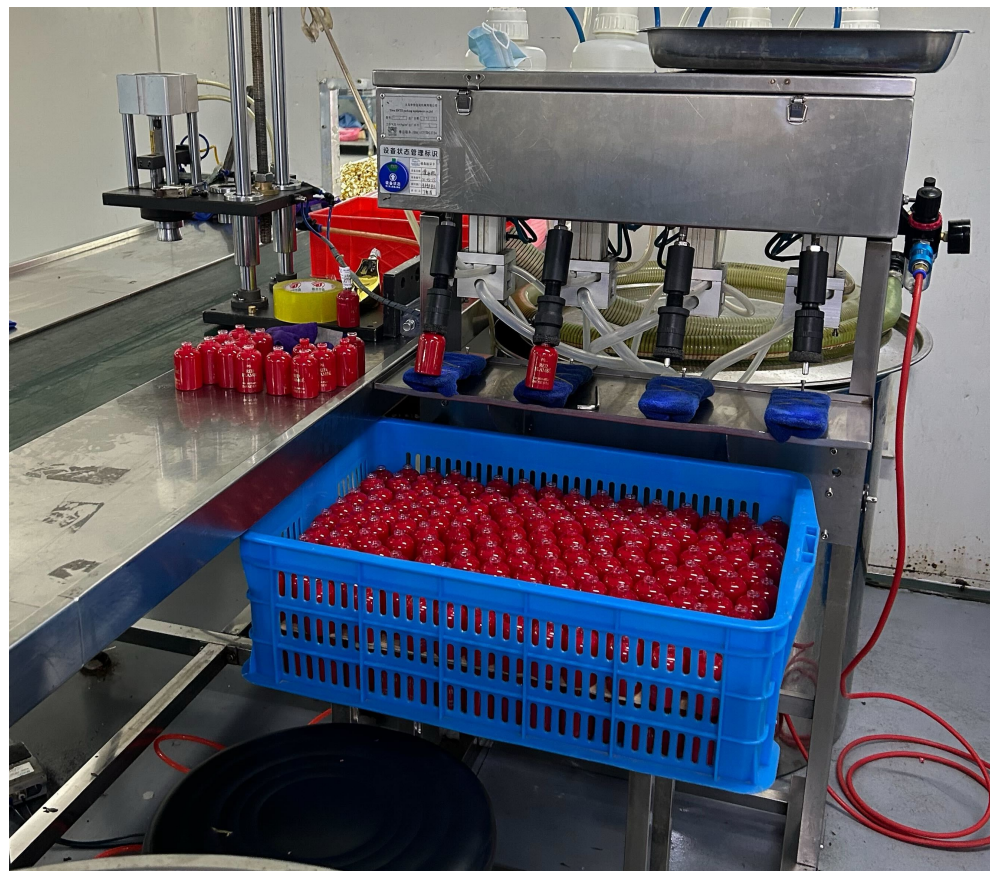
We only work with suppliers who share our commitment to human rights. We require our Tier 1 product suppliers to adhere to our Supplier Code of Conduct which includes a firm commitment that all goods shall be manufactured in accordance with the ETI Base Code and that suppliers shall follow the basic principles of the Code at all times.

It is unacceptable for our suppliers to outsource production of our orders to external manufacturing sites as they are not able to guarantee the required standards laid out in our Code of Conduct. However, on the rare occasion that extreme business circumstances create a short-term requirement for outsourcing to take place, the supplier must sign a copy of our Outsourcing Declaration to confirm our responsible conditions for outsourcing will be met.

Our Policies

Our commitment to preventing slavery and human trafficking in our operations and supply chain is reflected in our business policies.

All **matrix** staff take up their posts freely and ID checks are undertaken by the People team before employment begins. Employees receive contracts outlining role expectations, working hours, benefits, and policies such as our Belonging Policy, Employee Handbook, and Speak Up at **matrix** (whistleblowing).



Our Supply Chain

We procure goods from 31 Tier 1 product suppliers, including suppliers of packaging and componentry, as well as finished goods manufacturers.

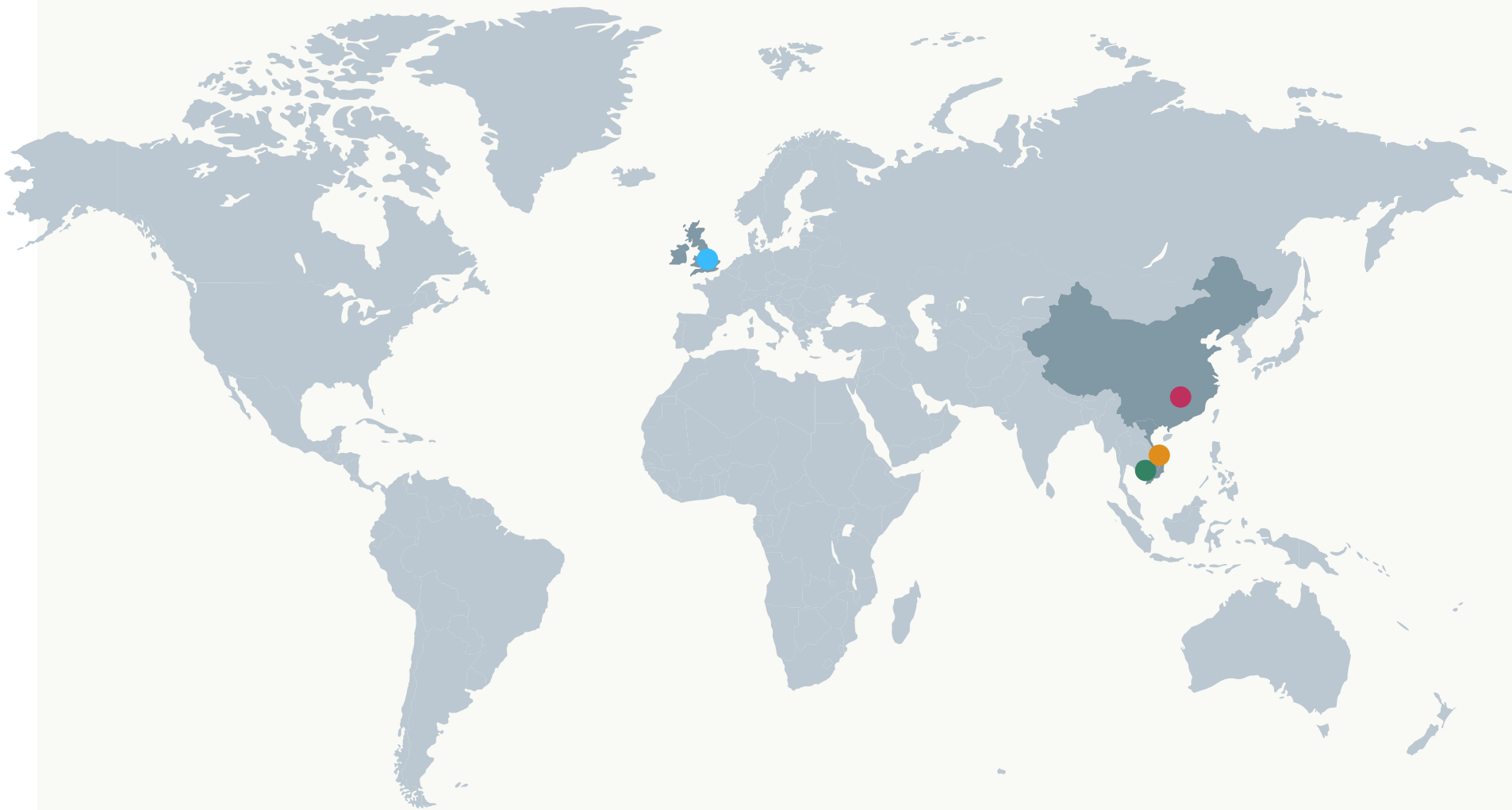
Managing complex supply chains relies on building long-lasting mutually beneficial partnerships. 61% of our suppliers are based in China, this is where our business began and we have established relationships of at least 5 years with 84% of our suppliers in China, with 26% over 10 years. This helps us to maintain high levels of production quality, cooperation, and transparency.

The integration of **matrixlabs** into the business has increased the number of suppliers we work with in the UK. 33% of our Tier 1 product suppliers are now UK based.

This year we have progressed mapping of our Tier 2 suppliers, providing us with greater visibility of our supply chain. We have started with mapping the Tier 2 suppliers of our China based Tier 1 suppliers identifying 162 suppliers including raw materials, componentry, and packaging suppliers.

As part of our wider value chain, we also have partnerships with three 3rd Party Logistics providers based in the UK and US, who are pivotal in ensuring that our products arrive safely with our customers on time and in full.

Country	Number of Suppliers	% of Total	Number of Workers	% Male	% Female
● China	19	61%	6,263	40%	60%
● Vietnam	1	3%	430	22%	78%
● Cambodia	1	3%	5,526	23%	77%
● UK*	10	32%	-	-	-



*We do not yet have information of the number of workers in our UK supply chain. As we embed **matrixlabs** into our responsible sourcing programme we will gather and report on this data in future years.

We publish our Tier 1 product suppliers on [Open Supply Hub](#).

Risk Assessment

Adopting a risk-based approach to due diligence is critical for proactively identifying and addressing human rights issues effectively across our operations and supply chain.

Identifying Risks

We identify risks in our supply chain through:

- Supplier self-assessment questionnaires
- Factory visits
- Third-party audit reports
- Country and sector risks
- Information from our key partners, NGOs and peers

Prioritising Risks

We assess and prioritise human rights risks by evaluating both likelihood and severity.

Likelihood is determined by:

- **Country risk** – We assess risk levels using publicly available data such as the Maplecroft Child Labour Index, The Labour Rights Index, the WJP Rule of Law Index and the LRQA’s Supply Chain ESG Risk Outlook.
- **Supplier practices and performance** – Through our supplier factory visits, audits and self-assessment questionnaires, we evaluate actual risks.

Severity is assessed through three factors in alignment with the United Nations Guiding Principles ([UNGPs](#)) on Business and Human Rights:

- **Scale:** The seriousness of the potential impact.
- **Scope:** The number of people who could be affected.
- **Ability to Influence:** Our capacity to mitigate or address the impact, including whether we have sufficient leverage for change.

Based on the risk assessment findings we assign a risk rating to each supplier, guiding our due diligence, training, and capacity-building efforts.

Areas of Highest Risk

Our highest-risk sourcing regions are **China, Vietnam, and Cambodia**, which account for **68% of our suppliers**. These countries pose increased risks of labour rights violations and modern slavery. Additionally, raw material sourcing and manufacturing are high-risk areas in our supply chain, where low-cost labour and high production demands can lead to violations.

Our human rights due diligence is more comprehensive in these high-risk areas to ensure our resources are used effectively to drive meaningful change in our supply chain.

Our Salient Risks

We have identified the following salient risks in our supply chain. To address these critical areas effectively, we concentrate our due diligence, capacity-building, and training efforts on mitigating these risks.

1.

Lack of transparency in audits

A lack of transparency in audits (i.e. whether the true workplace conditions are reflected in audit findings) makes it difficult to accurately assess labour conditions and enforce improvements.

In 2024, China was the least transparent sourcing market globally, with the majority of our supply base in China this presents a significant risk.

Mitigation Actions

We maintain an on-the-ground presence in China through our Social Responsibility team, who regularly visit both current and potential factory partners. These visits, along with in person training and capacity building programmes are critical for ensuring visibility and building trust. Our long-term relationships with suppliers play a vital role in improving transparency and honesty.

2.

Excessive working hours

Labor shortages and high production demand, such as from seasonal demand changes and short lead times, can result in excessive working hours, leading to worker fatigue, reduced wellbeing, and unsafe working conditions.

For example, in China, where fewer young people are entering manufacturing, combined with purchasing practices with unrealistic deadlines, excessive working hours are a higher risk.

Mitigation Actions

This year, we implemented a capacity-building programme at one of our supplier factories where working hours issues were identified through audits.

We are also part of the ETI's Responsible Purchasing Practices programme, aimed at shifting our purchasing methods to help reduce common triggers for excessive working hours across our supply chain.

3.

Barriers to freedom of association and collective bargaining

Workers may face barriers to organising or joining unions, limiting their ability to negotiate for fair wages, better working conditions, or protection from exploitation.

China, Cambodia and Vietnam were all identified as extreme risk countries for guaranteeing freedom of assembly and association in 2024. A lack of freedom of association is a systemic issue in China, with it being ranked 141 out of 142 countries assessed.

Mitigation Actions

We engage with our suppliers to encourage the creation of worker representation forums and processes for opening up dialogues with workers. These forums offer an alternative means for workers to express any concerns without having to report directly to managers.

We recognise the challenges we face in this area, as our ability to influence change can be limited, with broader societal factors driving this risk. Only 26% of our Tier 1 factories in China, Cambodia and Vietnam have established trade unions, and 68% having nominated worker representatives.

4.

Lack of access to grievance mechanisms

Workers may lack access to reliable and safe channels to report issues such as abuse, harassment, or unsafe working conditions, leaving problems unresolved and workers without remedy.

We are also aware that while grievance mechanisms may exist a lack of awareness of how to use them can render them ineffective

Mitigation Actions

This year we delivered training on establishing effective grievance mechanisms in 10 supplier factories, following which 8 suppliers established grievance procedures and 7 maintained grievance records.

Through the ETI's Responsible Purchasing Practices programme we have identified a lack of understanding in one of our factories on how to use complaint and grievance mechanisms, hindering workers from effectively voicing concerns. We will be rolling out training with this supplier next year to address this issue.

5.

Limited visibility beyond Tier 1

Limited visibility into deeper supply chain tiers increases the risk of modern slavery practices and other labour rights issues, where issues can remain undetected in subcontractors or lower-tier suppliers due to a lack of visibility and leverage.

Mitigation Actions

This year, we began mapping our Tier 2 supply chain and plan to expand our due diligence to beyond Tier 1 in the future. We have mapped 162 Tier 2 suppliers to date, including raw materials, componentry and packaging suppliers.

We will continue to work collaboratively with our Tier 1 suppliers to expand our understanding of our Tier 2 suppliers and beyond.

7.

Child labour

The risk of child labour is particularly high in lower-tier suppliers or regions with weaker regulatory enforcement. China, Vietnam and Cambodia are all higher risk regions for child labour. This risk increases during peak production seasons as well as periods such as summer holidays and after Chinese New Year, when children may be employed in hazardous or exploitative conditions.

Mitigation Actions

No instances of child labour were identified in our supply chain in 2024.

We are members of the Centre for Child Rights and Business (CRIB) Working Group which brings companies together to collaborate, share best practice, and access the latest information and insights related to child rights and human rights due diligence. CRIB also provides reports of cases of child labour, helping us to understand the level of risk in our factories.

6.

Unsafe and unhygienic working conditions

Workers may be exposed to unsafe or unhygienic conditions, including hazardous chemicals, insufficient safety protocols (including fire safety), or inadequate protective equipment, leading to injury, illness, or long-term health problems.

Health and safety issues are the most common area of non-conformances identified through our supplier audits.

Mitigation Actions

We work collaboratively with our factories to ensure working conditions are improved where any issues are identified.

For example, this year we worked with a supplier to improve awareness of wearing PPE after noting that workers who were exposed to chemicals weren't wearing masks and gloves, this including creating policies, providing training, and developing processes for ongoing monitoring.

Gender inequality

Female workers often face gender-based barriers, including unequal pay, fewer career development opportunities, and a lack of protection from workplace harassment. Limited family-friendly policies and childcare support also contribute to economic insecurity for women.

UN Women and the EU have identified a heightened risk for female workers, particularly internal migrants in the Guangdong Province.

Mitigation Actions

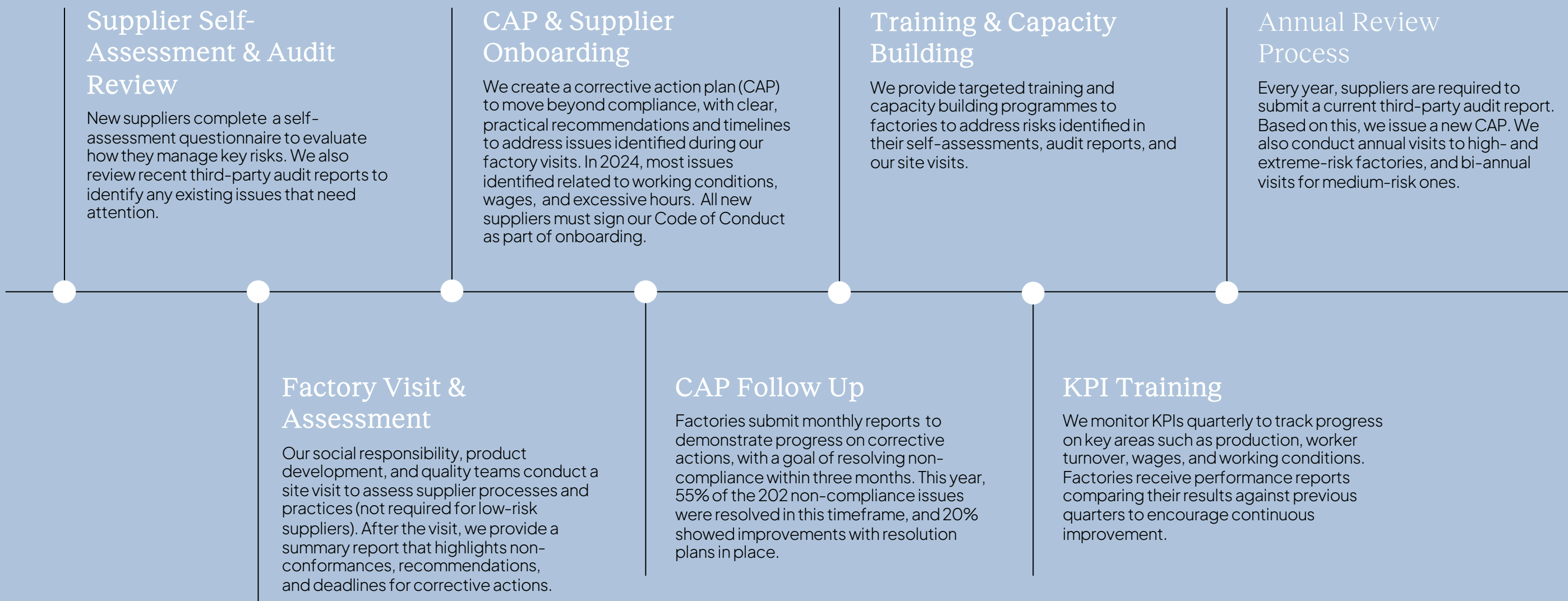
We joined the Women in Motion Training of Trainers, a programme run by UN Women and the EU aiming to enhance decent work and career development among migrant women workers in the Guangdong Province. Following this, we have run an on-site training at one of our supplier's factories to help establish mechanisms to support gender equity, covering topics such as better communication between female workers and employers, and monitoring of career development.

In April, we also partnered with The Centre to conduct a workshop in one of our supplier's factories focused on preventing workplace sexual harassment.

Risk Prevention & Mitigation

Our Beyond Audit Process

Beyond Audit, our internal human rights due diligence programme, goes beyond reliance on audits alone, to working collaboratively with suppliers to identify risks, design effective remedial actions, and provide targeted training and capacity building to the factories we work with.



Case Study: Responsible Purchasing Practices Initiative

As a business working with third-party manufacturers, we recognise the significant impact that our purchasing practices can have on factory conditions. To better understand and improve these practices, we are participating in a 21-month peer learning initiative led by the ETI.

This initiative has brought together teams from across our business including Supply Chain, ESG, Sales, Sourcing, and Product Development. Through a series of workshops, supplier surveys, and consultations, we have gained valuable insights and identified key areas for improvement, such as streamlined sampling, better adherence to critical paths, and more accurate forecasting and planning.

Building on these learnings, we are now taking part in a pilot project with the ETI and one of our suppliers. We have recently conducted a baseline assessment with them to gather comprehensive feedback on our purchasing practices. This included engagement with 40 workers via a mix of one-on-one interviews and focus groups, as well as a digital survey which collected responses from a further 294 workers.

Using the feedback from the baseline assessment, we are implementing improvements to our sampling approach and will conduct a follow-up survey in early 2025 to assess the impact the improvements made have had on working conditions. We look forward to using these insights to refine our procurement practices across our supply base, creating meaningful change for the people working in our supply chain.



Strengthening Awareness & Preventing Sexual Harassment

In April 2024, we partnered with [The Centre](#) to deliver a one-day training and consultation workshop at a supplier factory in China, focusing on preventing workplace sexual harassment. The training equipped participants with tools to prevent harassment and empower female workers. As a result, the factory implemented a sexual harassment prevention policy and action plan.



Reducing Excessive Working Hours

Through our Beyond Audit program, we identified excessive working hours at a supplier factory and launched a capacity-building project to address the root causes of the issue and help the factory reduce working hours sustainably.

Working with factory management, we analysed production planning, quality control, supplier performance, workforce structure, and turnover rates. We then delivered training sessions to improve productivity, planning, and employee engagement. Progress is being tracked through monthly KPIs and collaboration with factory management to ensure ongoing improvements are made.



Training & Capacity Building

At **matrix**, our hands-on approach to addressing modern slavery risks centres on training and capacity building. We work in partnership with our suppliers, acknowledging that we have an important role to play in improving working practices.

Our training programmes are tailored to each supplier's specific needs, using insights from on-site audits and CAPs to target high-risk areas and recurring challenges. We also provide bespoke capacity-building projects, helping factories to drive continuous improvement by offering a deeper analysis of existing processes and providing actionable recommendations to address salient issues.

Our Social Responsibility and ESG teams are committed to ongoing learning and development. Throughout the year they have participated in events, training sessions, and working groups to deepen their expertise, stay updated on sustainability trends, and share our experiences and insights with our network.

Case Studies

Workers Voice

matrix fully respects the rights of all employees and workers in our supply chain to form and join trade unions, participate in collective bargaining, and engage in other activities related to the protection of their interests. Freedom of association is a key principle of the International Labour Organisation's (ILO) conventions and is considered a fundamental human right, linked closely with the principles of democracy and social justice. It allows workers to organise collectively to address workplace issues, advocate for their rights, and negotiate with their employers to improve working conditions.

As members of the ETI, we fully support and insist our suppliers follow the ETI Base Code clause on Freedom of Association. We encourage our suppliers to assign worker representatives and set up worker committees to ensure their voices are heard and any grievances and employment issues are addressed by senior management.

In 2024, our Social Responsibility Team delivered training on establishing effective grievance mechanisms in 12 supplier factories, reaching 238 workers, 44% of whom were supervisors. As a result of this training, all 12 suppliers implemented formal grievance procedures and guidelines, and 10 factories now maintain comprehensive grievance records.

Whilst internally our employees do not currently engage with any trade unions, we share ways in which staff can make suggestions and voice their concerns through our grievance mechanism. We also conduct regular employee engagement surveys and encourage our staff to raise any concerns through their quarterly review meetings with managers. We operate an open-door policy so employees can communicate directly with leadership or report anonymously through our whistleblowing procedures.



Of our Tier 1 product suppliers in China, Cambodia and Vietnam:

6 (29%) have established trade unions

14 (67%) have nominated worker representatives

11 (53%) have Environment and Health & Safety Committees

Looking forward

We are proud of the progress we have made to date but recognise that there is still much work to be done. In 2025, we will continue to enhance our efforts to identify, mitigate, and prevent modern slavery and human rights violations in our operations and supply chain.

Our focus will be on further integrating our **matrixlabs** suppliers into our due diligence processes and continuing our Beyond Audit programme, working collaboratively with our suppliers across the globe to drive continuous improvement.



matrix

create amazing.

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