

Superdrug ☆

Modern Slavery and Human Trafficking Statement

Superdrug Stores plc
Year ended 27th December 2025.



Introduction

At Superdrug we are mindful that as a leading UK Health and Beauty Retailer with a worldwide value chain we must always act ethically and engage with our employees, suppliers and contractors to ensure that they are aligned on our Anti-Modern Slavery agenda. Modern Slavery is a global human rights issue that affects millions of people worldwide, including in the UK, and requires a coordinated effort from governments, businesses, and individuals to tackle.

We issue our 2025 Modern Slavery and human trafficking statement in accordance with section 54(1) of the Modern Slavery Act 2015. It sets out the measures that Superdrug Stores plc have taken to combat Modern Slavery and human trafficking from occurring within our operations and supply chain. This statement relates to Superdrug business activity during the financial year ended 27th December 2025 and sets out our continuous commitment to combat Modern Slavery.

Some of the data within this statement covers the operations of Superdrug across and UK, Ireland, Jersey and Guernsey, where this is the case there is a note to reflect this.



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Message from our Chief Executive Officer

Peter Macnab

Modern Slavery remains one of the most pressing human rights challenges of our time. In 2025, businesses across the globe continue to operate in an environment shaped by rapid change—economic uncertainty, technological disruption, and the growing impacts of climate change. These dynamics, combined with ongoing conflicts and migration pressures, have created conditions where exploitation can thrive. As a UK retailer with a global supply chain, we recognise that our responsibility extends beyond compliance; it is about taking meaningful action to protect the most vulnerable.

This statement outlines the steps we have taken over the past year to strengthen our approach to preventing Modern Slavery and human trafficking. We know that risk is not confined to distant regions—it can exist within local communities and domestic supply chains. That is why our strategy focuses on transparency, collaboration, and continuous improvement, ensuring that ethical practices are embedded at every level of our business.

In 2025, we continued to invest in robust due diligence processes, enhanced supplier engagement, and partnerships that drive change. Our Modern Slavery Steering Group remains central to this effort, bringing together expertise from across the organisation to monitor risks, share insights, and implement best practices. We are proud to maintain our partnership with Unseen, whose work supporting survivors and operating the UK Modern Slavery & Exploitation Helpline is critical to tackling exploitation.

We understand that eradicating Modern Slavery requires persistence and partnership. By working closely with our suppliers, stakeholders, and industry peers, we aim to create a supply chain that is not only resilient but also rooted in respect for human rights. This is an ongoing journey, and we remain committed to playing our part in building a fairer, safer, and more sustainable future.

Reporting a Concern

We understand that it takes great courage to decide to raise a concern about suspected Modern Slavery or exploitation or to reach out for help if you are a victim. We want to make it as easy as possible for concerns to be raised which is why we have included the reporting information below. If you suspect cases of current or historic Modern Slavery or exploitation, in any part of our business or tier of our supply chains, we urge you to report these concerns through the below channels. All reports will be treated confidentially by colleagues, proof is not required to report a concern. Even if you are unsure if a concern is related to Modern Slavery, we urge you to report this to Superdrug to investigate:

Internal Whistleblowing inbox:
SpeakUp@uk.aswatson.com

Internal Whistleblowing phone line:
07846 162363

This reporting line is open to all colleagues or individuals who work with us, reports can be treated confidentially, and you do not have to give your name. The phone line is open during business working hours; with a voicemail service available and the call will be returned if requested.



If you are a victim of exploitation, or are concerned about potential victims, you can contact the free and confidential Unseen Modern Slavery & Exploitation Helpline.

Helpline: 08000 121700

Webform: <https://www.modernslaveryhelpline.org/report>

Download the app: <https://www.unseenuk.org/about-modern-slavery/download-the-app>

You can contact the Helpline to report exploitation, to receive independent advice and guidance, or for assistance in accessing support.



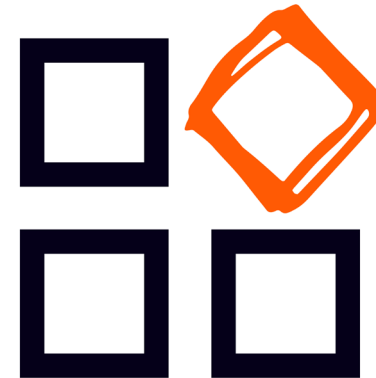
Foreword: Unseen Partnership

“I am extremely delighted to be continuing our fruitful partnership with Superdrug delivering value through our in-depth procurement training and ongoing review of progress. As both an Unseen hub member and a portal member, we work collaboratively with AS Watson to strengthen their approach and help drive real change through their supply chain and own operations. Working together is so vital in reducing the risks of Modern Slavery and ensuring all workers, regardless of background or location, are genuinely free from exploitation.”



Justine Carter,
Deputy CEO, Unseen

To find out more about Unseen's vital work click here:
[About Modern Slavery - Unseen \(unseenuk.org\)](https://unseenuk.org)



unseen

2025 Summary

Whistleblowing Cases related to Modern Slavery: 0

Modern Slavery Internal Investigations of our Operations and/or Supply Chain 2025: 1

One of the core values at Superdrug is honesty. We believe that working in an open and honest manner is key in making sure we are doing what we can to support Modern Slavery eradication. Led by our committed internal Modern Slavery Steering Group during 2025, we undertook activities to mitigate the risks of Modern Slavery within our business.

Investigation 1:

Business Area: Service Provider Contractor

During 2025 we undertook an investigation into concerns raised by one of our contractors in relation to a small number of their employees' right to work documentation. Using our remediation policy and associated documents to undertake the investigation, it was subsequently concluded that there were no cases of Modern Slavery or exploitation. We worked closely with the supplier to understand their processes and internal investigation. Although no cases of exploitation were found the supplier took the opportunity to review their internal policies and processes.



2025 Headlines



Launched a Modern Slavery Remediation Policy – to build on our Modern Slavery Policy from 2024 we developed, tested and launched a supplementary Remediation Policy (pg 18)



100% of Own Brand Suppliers have an independent ethical audit in place – we continue to ensure that all Own Brand suppliers have an ethical audit in place. We do not purchase from suppliers where we do not hold an in-date ethical audit (pg 21)



Kicked off an enhanced tendering process for one of our high-risk business areas – partnering with Unseen we have created an enhanced Modern Slavery screening process for our Property Contractor tender (pg 23)



Exited the final partnership we held with an external beauty services supplier – all of our Beauty Services are offered by internal Superdrug colleagues who have undergone our standard employment checks and have the same employee protections



All Superdrug field and Head Office colleagues were required to complete mandatory Modern Slavery and Human Rights training (pg 26)



Partnering with Unseen we undertook a bespoke 2.5-hour procurement training session for our procurement department (pg 26)



Colleague and supplier engagement activities across Anti-Slavery week (pg 27)

Superdrug History and Group Structure

Founded in 1964, Superdrug is one of the UK's leading Health and Beauty Retailers and is a wholly owned subsidiary of AS Watson (Health & Beauty UK) Limited ("ASW H&B UK") and is a member of the AS Watson Group which is the world's largest international health and beauty retailer. ASW H&B UK are made up of the following companies:

Superdrug ☆

savers

HEALTH HOME BEAUTY

THE PERFUME SHOP



We provide Health and Beauty products and services across retail stores and online in the United Kingdom, Republic of Ireland, Jersey and Guernsey.

Superdrug is ultimately controlled by CK Hutchison Holdings Limited, which is listed on The Stock Exchange of Hong Kong Limited. We benefit from the resources of the AS Watson Group in our Anti-Modern Slavery activities. For example, the AS Watson Group continues to engage with The Mekong Club, a leading non-government organisation working against Modern Slavery that works with companies and their suppliers to develop awareness, practical toolkits, and strategic thinking to end Modern Slavery.



The Mekong Club is a not-for-profit organisation that focuses on working with the private sector to address Modern Slavery and related crimes, such as human trafficking and forced labour. AS Watson Group our parent company was the first signatory of The Mekong Club to sign up to its Business Pledge Against Modern Slavery in 2017, demonstrating their commitment to preventing and addressing Modern Slavery. We ask that all suppliers adhere to this high level of ethical conduct through our supplier code of conduct (“Supplier Code of Conduct”). At Superdrug through AS Watson we lead by example and the same ethical conduct standards are incorporated into our employee code of conduct (the “Employee Code of Conduct”). All our employees and contractors are expected to meet the high ethical behaviours and principles set out in our code of conduct. The employee code of conduct is hosted on our policy portal and internal communication channel. For all Heads of Department and Directors they must confirm they will comply during onboarding.

We continue to use the Mekong Club training materials and resources to form part of our colleague induction program and employee training which is refreshed every two years. The training is impactful in raising awareness of the extent of Modern Slavery globally, including here in the UK. We have also developed and delivered more specialist Anti-Modern Slavery awareness training, with materials from The Mekong Club for employees who are at a higher risk of encountering Modern Slavery victims or activities, such as human resources managers, distribution and logistics managers, and procurement managers.



Our Operating Model

At Superdrug we employ over 15,000 colleagues across our stores, distribution centre, pharmacies, beauty services, nurse clinics and head office. We also work with 3rd party agencies across our business such as in our distribution centre and we recognise that these individuals are at a higher risk of exploitation than our internal colleagues which is why they are identified as one of our key areas of risk.



Main products and services

We are a UK, Ireland, Jersey and Guernsey retailer providing store and online shopping for health and beauty products and services



The sector we operate in:

Retail Market for health and beauty products



£1.7b

UK Revenue(net)



768

Total Stores
UK: 755
ROI: 11
Jersey: 1
Guernsey: 1



2

Distribution Centres



178

Stores with Pharmacy Services



613

Stores with Beauty Services



97

Health Clinics UK



1800+

Total Number Primary and Secondary suppliers



75

Own Brand Suppliers

Anti-Modern Slavery Governance Framework:



At Superdrug our ESG strategy focuses on the three Sustainability pillars of Planet, People and Products. Human Rights is one of the ESG key focus areas which sits within the People Pillar of our ESG framework. Modern Slavery and exploitation prevention is an important part of this. We have aligned our ESG strategy to the United Nations Sustainable Development Goals, with our Anti-Modern Slavery activities supporting target 8.7;

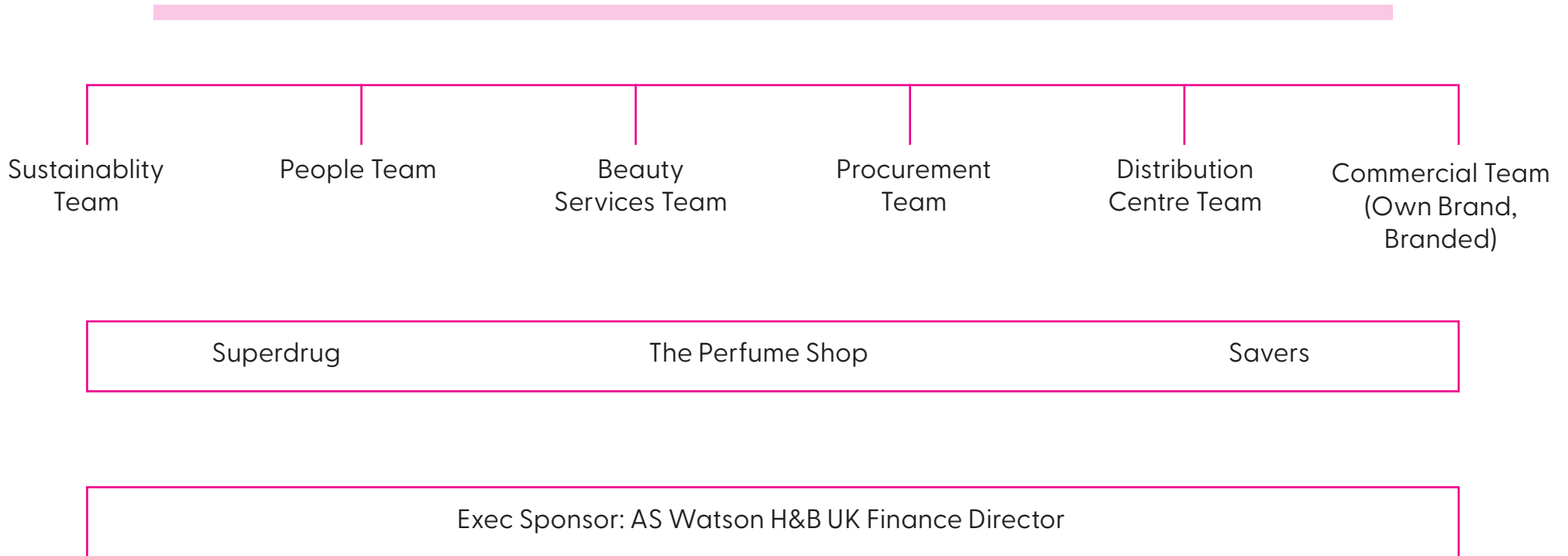
“Take immediate and effective measures to eradicate forced labour, end Modern Slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms”.

The three UK business units of AS Watson (Superdrug, Savers and The Perfume Shop) have formed a dedicated Anti-Modern Slavery Steering Group. The Steering Group’s purpose is to undertake ongoing risk assessments of our business’ full value chain and then to oversee and co-ordinate the Anti-Modern Slavery initiatives for all UK based companies of the AS Watson Group. The Steering Group includes representatives from different departments across the three businesses and is chaired by the Head of ESG for Superdrug and sponsored by the ASW H&B UK Finance Director. The Head of ESG is responsible for the wider Sustainability strategy at Superdrug and provides the three AS Watson H&B UK businesses with guidance on upcoming ESG related governance and regulatory changes. The Finance Director has been sponsoring the Steering Group since inception as director lead for the legal, regulatory and finance functions.



[*THE 17 GOALS | Sustainable Development \(un.org\)](https://un.org/sustainabledevelopment)

Anti-Modern Slavery Governance Framework: AS Watson Modern Slavery Steering Group



The Steering Group undertakes strong governance principles including maintaining minutes and action logs to ensure workstreams are continued outside of the monthly meeting and actions delivered on in a timely manner.

The Steering Group's responsibilities are:

- monitoring, reviewing and reporting on Anti-Modern Slavery activities.
- assessing potential risk areas that could be exposed to Modern Slavery.
- developing initiatives to help mitigate Modern Slavery risk areas that have been identified within our business and supply chain.
- progressing our Anti-Modern Slavery strategy and implementation plan including regular reviews of progress within our business operations and supply chain.
- reporting back to our business and key stakeholders on the results, including any Anti-Modern Slavery corrective activity identified.
- implementing any AS Watson Group wide strategy related to preventing Modern Slavery.

Modern Slavery forms an integral part of the “People Pillar” which is one of our three pillars in our wider Sustainability framework coined *Doing Good Feels Super*. More information on our Sustainability activities can be found here: [Environmental, Social, & Governance](#).

The Steering Group working with Unseen has undertaken a risk assessment of its operations, using this to form the basis of the ongoing activities to strengthen our Anti-Modern Slavery activities. In addition to the activities of 2025 outlined in this statement, over the years we have strengthened our approach, through:

- Anti-Modern Slavery Policy launched
- Inclusion of Anti- Slavery terms and conditions for all suppliers
- Inclusion of Anti-Slavery protections in our tender procurement documentations
- Addition of low-risk countries to our mandatory supplier ethical audit requirements
- Annual colleague engagement events to align to Anti-Slavery week
- Mandatory Modern Slavery training for all colleagues
- Promotion of the Unseen helpline and Superdrug Speak Up helpline to all colleagues
- Macro-Supplier risk assessment undertaken with support from Unseen
- Agency employee anti-slavery and exploitation checks with main agency supplier in our distribution centre.





Key Modern Slavery Risks in our Operations and Supply Chain

The Steering Group identified the key risk and control areas in regards to Modern Slavery and exploitation. Through the output of our Macro Risk Assessment review undertaken in 2025 with Unseen we were able to assess and prioritise the risks within our business which created the foundation for our work for 2025. This also helped us to ensure that we are focused on the most salient risks.

Key Control Areas

Governance & Reporting	Having a robust governance and reporting framework helps to keep our Anti-Modern Slavery agenda and actions on track, giving accountability to the Steering Group workstream leads. This is managed by the Anti-Modern Slavery Steering Group Chair, Head of ESG for Superdrug.
People, Training and Communication	The people who work for us are important safeguards in our Anti-Modern Slavery activities. They are the ones working with agencies, engaging with suppliers and speaking to our colleagues on a daily basis. We understand the importance of having an upskilled and aware workforce to enable any concerns to be raised swiftly.
Salient Risks	The Steering Group's key risk and control areas which we are reporting in this Modern Slavery statement.

Salient Risk	Context	Workers Affected & Vulnerabilities	Mitigation & Controls	Review Frequency	Stakeholders Engaged to determine risk
Retail goods provider	We have a global value chain and engage with 3rd parties in a range of areas including the manufacture of goods both in the UK and overseas.	This presents a risk that the products we purchase have been manufactured using exploitation, including but not limited to child exploitation, excessive working hour and other labour abuses in the UK and across the globe.	Supplier code of conduct in supplier contracts. Ethical audits on all Own Brand Suppliers.	Ongoing reviews through our Steering Group.	Head of Trading Own Brand Quality and Technical Team Senior Procurement Managers Unseen NGO
Retail estate management	We operate stores across the UK, through our new store, refits and closures program we work with property contractors.	This presents a risk of these services being provided by exploited workers including but not limited to child exploitation, excessive working hour and other labour abuses.	Speak Up posters shared on build sites. Non-trade procurement contracts include provisions and code of conduct. Enhanced tendering process for property contractors	Ongoing reviews through our Steering Group.	Senior Procurement Managers Property Implementation team Unseen NGO
UK logistics operator (warehouses and distribution networks).	The colleagues who work in our distribution centres and logistic networks are made up of permanent, temporary and agency colleagues.	This presents a risk that individuals in this population of colleagues may be at higher risk of exploitation including excessive working hours and other labour abuses.	Recruitment practices as outlined in this statement. Engage with our agency staff supplier to review their recruitment reviews. Speak Up posters shared in Distribution Centres.	Ongoing reviews through our Steering Group.	Senior Distribution Managers Unseen NGO
Beauty services provider	The UK Beauty Services industry is recognised as a high-risk area for Modern Slavery, including excessive working hours and sexual exploitation.	This presents a risk that individuals in this population of colleagues may be at higher risk of exploitation including excessive working hours and other labour abuses.	In 2025 we moved to all Beauty Services colleagues being employed directly with Superdrug. Prior to this some were via a 3rd party supplier. Recruitment practices as outlined in this statement. Speak Up posters shared in all stores.	Ongoing reviews through our Steering Group.	Senior Beauty Services Manager People Team Colleagues Unseen NGO

Policies



Superdrug is committed to operating with zero tolerance to Modern Slavery or exploitation across the supply chain. We have an extensive range of AS Watson Group and UK human resources' policies to support this. Below are some of the policies we have to support our colleagues:

The Employee Code of Conduct is available to colleagues on our policy portal. It applies to all our employees and contractors and sets out the ethical standards and principles we expect our employees to uphold for our business. Transparent, honest and ethical behaviours continue to be the pillars we hold at the forefront of our business, as well as countering Modern Slavery and forced labour, bribery and corruption.

Whistleblowing policy This explains what it means by 'blowing the whistle', ways to report concerns and emphasises our commitment to protect team members who raise things with us. Within this policy is our Speak Up helpline which can also be used to escalate concerns about Modern Slavery or exploitation.

Grievance policy This describes how to raise concerns in the workplace (that fall outside of whistleblowing) and our approach to resolving them.

Recruitment policy This lays out the processes we follow when recruiting new team members into the business and how we ensure fairness for all applicants.

Right to work policy This policy guides our teams on how to complete a right to work check so that anyone who joins us has permission to work in the job we are offering. It is one of the key measures we take in ensuring there is no illegal employment in our business.

Supplier Code of Conduct This sets out commitments for all suppliers, consultants and counterparties who supply or provide goods and services to us, to comply with all applicable laws, regulations, conventions, as well as undertaking best practice in the areas of ethical behaviour, social responsibility, Modern Slavery, responsible operations and environmental protection. Non-compliance with this Code by the Supplier may result in the Group reviewing the business relationship. We are committed to observing the principles as set out in the BSCI Code of Conduct and is a member of the Mekong Club Business Pledge against Modern Slavery. The principles under the BSCI Code of Conduct are found under the link (<https://www.amfori.org/content/bsci-code-conduct>) and the Business Pledge against Modern Slavery as set out by the Mekong Club are found under the link (<https://themekongclub.org>). The Group requires its Suppliers to observe and comply with the principles as set out in the BSCI Code of Conduct and the Mekong Club Business Pledge.

CK Hutchison Human Rights Policy This policy outlines the approach the wider CK Hutchison Group takes to respect and promote Human Rights across all the countries and businesses they operate in. The policy is published here: [CK Hutchison Holdings Limited - Sustainability > Sustainability Policies](#).

Modern Slavery policy This sets out our commitment to acting ethically and with integrity in all our business dealings and relationships. The policy also covers how our employees can report incidents, undertake awareness training and what happens if there are breaches of the policy.

Policies



Remediation Policy A new addition to the Modern Slavery policy this year was a section on remediation as part of the collaboration with Unseen to embed this into our processes. This addition sets out how we respond to a potential Modern Slavery incident and what steps we can take to rectify the situation for the victim, to reduce future risk of similar incidents and to identify new opportunities to strengthen our Anti-Modern Slavery position. This also enhances the alignment of this policy to the UN Guiding Principles on business responsibility in preventing and addressing Modern Slavery. To support the practical application of the remediation policy we developed a high-level process map setting out the roles and responsibilities in dealing with a potential Modern Slavery incident. We also informed our wider teams, via internal communications such as Speak Up posters, policy portal and emails, of the appropriate channels to escalate any concerns of Modern Slavery they become aware of, ensuring such reports reach senior colleagues and our Modern Slavery Escalation Team.

The newly developed framework was used to investigate the concern raised in relation to a small number of workers engaged through one of our contractors (referenced on page 7 of our statement). We found this supported our investigation by establishing the scope of our investigation, the actions needed and detailing our findings.



Our human resources policies supplement and complement our Employee Code of Conduct, ensuring that our company principles are established at a local level. These policies are made accessible to every team member via our online policy portal. Our Employee Relations team are responsible for identifying any updates required to a policy and proposing amendments. These amendments are brought to our internal policy Committee who meet bi-monthly to discuss policy goals and sign off new and updated policies as required. As part of our Remediation process a policy review will be initiated following an investigation into a Modern Slavery report in order to action any improvements that have been identified.

Reporting and Escalating Concerns



We provide our employees including contractors and agency staff access to a confidential helpline called “Speak Up”. This enables individuals to report any concerns directly to the Superdrug Head Office via telephone (07846 162363) or email (Speakup@uk.aswatson.com) to be dealt with confidentially by a member of the people team overseen by a senior colleague who has undertaken enhanced Anti-Modern Slavery training, including remediation training.

The “Speak Up” helpline is responded to during our business working hours (but reports can be left via message or email at any time of day). Information about the helpline forms part of all employees’ online inductions and is displayed via posters around Head Office, Stores and the Distribution Centre. Furthermore, the helpline poster also contains additional contact details for CK Hutchison Holdings Limited, for those individuals who may feel unable to report to the direct employer which shows the importance of Anti-Modern Slavery across the whole corporate structure.

Upon receipt of a concern through the helpline, it is important to us that our action is quick but thorough and appropriate to the specifics of the case. The call handler will identify whether the concern needs to be assessed as a potential Modern Slavery case or if it is another type of concern that can be dealt with by one of our alternative resolution processes. If a concern needs to be assessed as a potential Modern Slavery case, then it will be escalated to investigation through the Remediation policy process. A suitable manager will then be appointed to review the concern and consider if it potentially indicates Modern Slavery. This person will be a senior manager from a relevant area of the business in relation to the concern and they will have undertaken the remediation training. Their assessment is completed using our toolkit which sets out indicators of Modern Slavery that align with Unseen’s guidance. Generally, the most

common types of Modern Slavery that a business is likely to come across, includes:

- Labour exploitation
- Criminal exploitation
- Child exploitation
- Sexual exploitation
- Domestic servitude

If a concern is registered as a potential Modern Slavery case, then the appointed manager will conduct an investigation in line with our framework that we developed in 2025. Throughout the investigation we would support the potential victim and treat them with the appropriate level of sensitivity and care. The Steering Group and AS Watson Group will be kept up to date as appropriate regarding any cases of potential Modern Slavery.

As part of our partnership with Unseen we also share their Modern Slavery & Exploitation Helpline number with our workforce, as an independent reporting route for concerns. The helpline number is shared via posters in our Head Offices and Distribution Centres.

In 2025, Superdrug further partnered with Unseen to become a member of the Unseen Helpline Business Portal. Through this membership, Unseen shares sanitised information of cases relating to AS Watson’s own operations or supply chain and then Unseen facilitates in next steps. This includes collaboration between stakeholders including other businesses, suppliers, labour providers and law enforcement to investigate potential issues collectively, ensuring that any cases raised are thoroughly investigated and any identified issues are remediated.

Supply Chain for Goods and Services

We continuously strive to act ethically in all our supplier negotiations to ensure that Modern Slavery is not taking place within our business or any part of our supply chain. We expect suppliers (and their sub-contractors) to act with the utmost integrity in the conduct of their business and to uphold the same high standards and values that we have with regards to combatting Modern Slavery. We require key suppliers to observe and comply with the principles as set out in the BSCI Code of Conduct (the “BSCI Code”) and the Mekong Club Business Pledge, through our Supplier Code of Conduct and Terms and Conditions. If we identify suppliers potentially using Modern Slavery within their supply chain (or any such subcontractor), either through our internal processes or via a concern being raised we will thoroughly investigate and take appropriate action. This action would depend on the outcome of the investigation but could range from remedial action plans to reviewing the supplier relationship. We are mindful that terminating contracts could lead to increased victim vulnerabilities. We will always prioritise guidance and remediation to improve standards.

Supplier Macro Inherent Risk Assessment

In our 2024 statement we outlined the start of our engagement with Unseen Business Services to conduct a Macro Supplier Inherent Risk Assessment looking at AS Watson’s UK based businesses top suppliers by spend. This risk assessment was carried out in the second half of 2024 and the results reviewed formally as a steering group in the first quarter of 2025. In total they assessed 1,800 suppliers using the data we hold. Unseen also utilise a range of reputable sources to assist in calculating the risk values, including the Global Slavery Index, US State Department Annual Trafficking in Persons Report (TIP) and Modern Slavery & Exploitation Helpline data. A risk rating was then assigned to each supplier from Very High Risk to Low Risk. Suppliers were then prioritised to ensure due diligence efforts conducted after the risk assessment could be focused on those suppliers with not only high risk, but high criticality to AS Watson, and their potential for influence.

From this Macro Risk Assessment, we ascertained that our previously outlined salient risks are still the most relevant to our business, we were able to strengthen our approach in some of those areas and ensure that meaningful actions were being carried out through 2025. An example of this was the enhanced due diligence in our procurement processes of property contractors.



2025 Enhanced Due-Diligence – Courier Services

During 2025 we were looking to sign a contract with a courier company to support the expansion of our customer delivery offers. During this tendering phase we became aware of general concerns around courier companies and the risk of exploitation of their drivers under their sub-contractor contract provisions. As a steering committee we felt that we needed to address this during our tendering processes and engaged all the companies to ascertain their employee safeguards. These were then reviewed as a steering group and recommendations made to enhance the contractual arrangements in place to ensure all drivers, including those being subcontracted were required to undertake the same high level of right to work checks and ongoing identification checks.

Supply Chain for Own Brand Products

At Superdrug, the products we have contractually manufactured under our guidance (“Own Brand”) are key to our success. We are conscious of our supply chain responsibility so high standards of ethical compliance are an integral part of our sourcing processes for Own Brand products, and we continually strengthen these standards wherever possible. As part of a larger international retailer, we recognise that our significant purchasing power has the ability to positively influence ethical minimum standards within our supply chain. We have a Supplier Code of Conduct, which we ask our suppliers to confirm they will observe as proof of their commitment to meeting these ethical standards. This includes their commitment to setting minimum labour standards and fighting Modern Slavery. We require that all our Own Brand suppliers act with the utmost integrity in the conduct of their business and observe and comply with the principles as set out in the BSCI Code and the Mekong Club Business Pledge.

Since 2008, the AS Watson Group, including Superdrug, has been an active member of amfori’s Business Social Compliance Initiative (“BSCI”), which is a leading business-driven initiative for companies committed to improving working conditions in the global supply chain. We follow the BSCI Code of Conduct and guidelines. The guidelines cover key principles such as ethical business behaviour, no bonded labour or child labour, decent working hours and fair remuneration, as well as requirements for auditing, remediation and training of suppliers located in risk countries. The latest BSCI Code is integrated into our trading contracts with suppliers through our Supplier Code of Conduct and for our Own Brand suppliers we conduct regular compliance assessments against the BSCI Code via our independent audits. We have a AS Watson Own Brand Quality Assurance guidelines which require all suppliers in high and medium risk countries to have an annual independent social audit, here at Superdrug we have extended to all suppliers including those in low-risk countries during 2024 and this was completed in 2025. The countries risk score is according to the Amfori Risk Compass.



All suppliers that carry out manufacturing activities to supply Own Brand products must undertake an appropriate independent ethical audit through an external audit firm using a reputable audit framework such as Sedex Members Ethical Trade Audit (SMETA). The results are submitted to our Own Brand Quality Assurance and Technical team to review, and we will only approve the supplier to manufacture our own brand products when we are satisfied that any perceived Modern Slavery risks have been addressed. Once established as a supplier, they remain subject to annual ethical audits regardless of the audit result, to ensure continuous monitoring and improvement across our supply chain by independent third-party auditing companies.

An ethical (social) audit is a formal and evidence based review of an organisation’s governance, policies, controls, and operational practices to assess alignment with applicable ethical, labour, human rights, and social responsibility standards, and to support risk management, compliance, and continuous improvement.

The audits are generally based on the labour standards of the International Labour Organisation and international guidelines such as the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and the UN Guiding Principles on Business and Human Rights. Besides SMETA, we accept other audit methodologies amfori’s Business Social Compliance Initiative (BSCI), the Ethical Supply Chain Program (ESCP, former ICTI) and the Initiative for Compliance and Sustainability (ICS). These audits assess working conditions, labour rights, health and safety, environmental standards, management practices, and business ethics. Where non-compliances are identified, a Corrective Action Plan (CAP) must be uploaded or submitted directly to Superdrug within 60 days of the audit date, irrespective of the overall audit grade or score.

We work in partnership with our suppliers to support the development and implementation of remediation plans. Where non-conformities are identified through social audits, we engage directly with suppliers to help them understand the findings, prioritise corrective actions and close out issues within agreed timelines. If appropriate remediation cannot be achieved alternative suppliers are engaged in a timely manner.

Our Own Brand products are sourced from over 75 suppliers, which manufacture their products in over 250 manufacturing sites across 28 different countries. We classify these manufacturing locations as residing in countries that are either low risk (for example the United Kingdom or Western Europe), medium or higher risk according to the Amfori Risk Compass. During 2025 we had no manufacturing sites in high risk, with the rest spread across medium and low risk countries.



Supply chain for goods and services not for resale

Superdrug regularly engage with third-party suppliers to bring goods or services into our stores and operations. We are committed to ensure that we safeguard all our processes against Modern Slavery and are especially diligent when procuring services undertaken by temporary, migrant workers, labour hire, subcontractors and those on lower pay, as we recognise that the people employed in these positions are often from sections of the community that are the most vulnerable.

We have numerous protections in place to mitigate the risk of Modern Slavery or exploitation, including:

- All suppliers invited to tender must provide anti-slavery statements or show a commitment to anti-slavery by accepting our Anti-Modern Slavery contractual commitments, which are the principles as set out in the BSCI Code to ensure that we only contract with businesses that align to our values. These written commitments seek to ensure that we do not engage with any suppliers who benefit from Modern Slavery.
- Our supplier Terms and Conditions for our goods and services not for resale include the same requirements around Anti-Modern Slavery activities as outlined in our supplier code of conduct.
- Included in our tender pack is wording to reflect our commitment to eradicating Modern Slavery and our partnership with Unseen.
- All our tenders will include an extensive ESG questionnaire as part of our tender pack. This pack contains numerous questions and request information about a business's awareness, risk assessment and mitigation in respect of Modern Slavery. The responses to the ESG questionnaires are then reviewed by the tender committee with support from the ESG and procurement teams as needed and considered during the tender process.

The aim is to ensure we only contract with like-minded businesses who have similar values and Modern Slavery commitments and to use our procurement opportunities to drive positive change. We have a minimum 10% ESG weighting in our scorecard for relevant tenders which are assessed via the type of good or services being tendered for and wider industry they operate in.

All tenders are reviewed by our investment committee which is overseen by our CEO and is made up of colleagues from procurement, finance, legal, operations etc depending upon the contract being tendered.

Example supplier questions and requests from ESG questionnaire

- o an annual Modern Slavery statement,
- o a Modern Slavery policy,
- o a Modern Slavery escalation and remediation process or policy,
- o processes in place to regularly assess right to work,
- o ways to carry out employee satisfaction reviews,
- o access to an anonymous whistleblowing helpline,
- o partnered with a Modern Slavery NGO(s),
- o mapped and assessed salient Modern Slavery risks within their business

During 2025 we identified that we have a number of higher risk contracts with regards to Modern Slavery activities, including those which involved third-party party contractors and labour. We use a mixture of direct employees and third-party contractors to support us with our ambitious property program of new stores, refits, and extensions. As part of the retendering of our property contractor tender, we worked with Unseen to include a detailed bespoke Modern Slavery risk assessment. The results of this are being used to assess the tender which is due to conclude during 2026 and enable us to support us in ensuring we only contract with those partners aligned to our anti-slavery ambition. This is being used as a pilot, if successful we are looking at how we can roll out this enhanced supplier due diligence for upcoming tenders in high-risk areas of our business.

People, Training and Colleague Engagement



Recruitment Protections

At Superdrug we are committed to recruiting ethically as per our Recruitment Policy. We will always ensure a right to work check is conducted before a team member joins us and we have an online onboarding process so that all new colleagues joining our business receive a consistent experience. We adopt measures that support in meeting the standards set out in the employer pays principle:

- our onboarding processes ensure team members set up their wages to be paid directly into their bank accounts and contracts of employment are in place for each employee.
- pay dates are communicated and wages are paid on time with an accompanying payslip.
- any requests to change bank details are monitored and where it is believed that the request is to change the account to one that belongs to a 3rd party, this is queried in case of a potential risk.
- there is clear, documented, processes for handling sensitive employee data including identity documents such as passports.

We provide all employees with clear employment terms and conditions.

In 2025 we did not carry out targeted recruitment from overseas territories but as a national brand we attract some applicants from overseas either through direct applications or referrals via agency. Team members that require employer funded work visas to take up employment in our business are directly supported throughout the visa application process by our internal People team, helping to ensure no undue fees are being charged.

We believe it is important to understand our people and that our people understand the brand they work for. Team members that join us take part in an induction process that is tailored to their role as well as receiving a welcome book outlining key information about how we operate and our history. Our probation periods ensure there are regular touch points during the initial stages of employment, providing a dedicated time and space to discuss progression and any needs a team member may have. We believe a culture that promotes openness, a feeling of belonging to our employer brand and identity, as well as recognition of individuality helps to reduce potential harm.

Employee Feedback Mechanisms

We are passionate about continued personal and professional development for all colleagues and truly believe the prevention of Modern Slavery is everyone's responsibility, and we should provide the tools to help our colleagues fulfil this development. We actively seek feedback from our colleagues on an annual basis through our engagement questionnaire. The results are analysed and shared at a department and company level with the people business partners working with senior managers to celebrate success and create actions for improvement. In 2025 our engagement score was 78% which puts us in the top 25% of global employers for engagement. The survey seeks to understand more about employee wellbeing as well as serves as a means for our colleagues to share feedback anonymously. In addition to this we have a range of union representation and employee forums.

At Superdrug we employ over 15,000 colleagues across our stores, distribution centres, pharmacies, beauty services, nurse clinics and head office. We also work with 3rd party agencies across our business such as in our distribution centres, pharmacies and beauty services departments and we recognise that these individuals are at a higher risk of exploitation than our internal colleagues which is why they are identified as one of our key areas of risk and mitigations put in place.

We recognise the importance of continuing to raise awareness about Modern Slavery and promoting a culture in which our teams feel confident they can 'Speak Up' and report any concerns they may have. Information on this is provided during all colleague inductions and we have 'Speak Up posters' available to colleagues in head office, distribution centres and our stores, which explains how they can raise any wellbeing concerns including Modern Slavery through our whistleblowing lines. We display the Speak Up and Unseen posters in our build sites, which means that the Unseen helpline and our internal whistleblowing line is available to all employees and third-party contractors who work with us during our store refit, opening and closure program. We also included a check via our independent audit company to ensure that this poster is being displayed on build sites.

Employee Engagement Feedback

"I love working for Superdrug as it is such an inclusive workplace and so diverse that I can be myself".

"The people are some of the best I've ever worked with".

"Superdrug has supported me throughout my career and always given me the tools to make me better. I love being part of a thriving business".

"I genuinely feel that I am valued by the company. I feel that this is a result from the compassion and trust that I have received from the people I have worked directly with".

"The positive and inclusive company culture is something I truly value. I appreciate how there's a strong emphasis on open communication and team building, which creates a really healthy and productive environment for everyone".



Training

We are committed to educating and raising awareness of Modern Slavery with all our colleagues across our business. Superdrug has a corporate induction that includes mandatory Anti-Modern Slavery training modules for all roles through an online platform called 'Edge'. The training covers the definition, causes, and consequences of Modern Slavery, as well as our policies and procedures to prevent and address Modern Slavery and is designed to raise awareness and understanding of Modern Slavery across our workforce. The training aims to equip the employees with the skills and knowledge to identify, report, and respond to potential cases of Modern Slavery in our operations and supply chain. The training also covers the legal and ethical implications of Modern Slavery, the best practices and standards for mitigating Modern Slavery risks. The training materials are provided by the Mekong Club.

The Anti-Modern Slavery training is reissued to all employees every two years, depending on the colleagues' start date, across all areas of the business. The Modern Slavery training is owned by the AS Watson Group People and Legal teams, who are responsible for maintaining and updating the content. This material is created in conjunction with the Mekong Club to ensure it is kept relevant. The training materials are reviewed biennial and amended when required, including in response to changes in legislation.

As part of the AS Watson Group work on Modern Slavery the key risk areas were identified, and an advanced training e-learning module developed for individuals working within these areas. The more detailed Anti-Modern Slavery awareness training

was created with materials from the Mekong Club for employees who may encounter Modern Slavery situations, such as human resources managers, distribution and logistics managers, and procurement managers. The Anti-Modern Slavery training takes place once every two years.

In 2025 we undertook in partnership with Unseen an in-depth 2.5-hour bespoke Anti-Slavery procurement training workshop for certain key colleague including our Own Brand procurement team, contract owners in property, beauty services and logistics. This training covered Modern Slavery risk in key industries, best practice due diligence, early warning signs in engagements and visual indicators of Modern Slavery, 17 of our colleagues who are involved in the procurement processes joined.

Superdrug will continue to monitor and track the completion of the training quarterly, through its online platform and report on the progress to the Steering Group. Our target is a 100% completion rate, although we recognise that this can be a challenge to achieve, our aim is to have an engaged workforce. The People Development team ensure there is ongoing reporting and senior management engagement to support a high completion rate.

89% Superdrug Training Completion Rate 2025



2025 Anti-Slavery Colleague Engagement Activities

One of our internal employee development opportunities “Aspire to Develop” supports important business projects. In 2025 one of the Aspire groups were tasked with supporting the AS Watson Anti-Modern Slavery Steering Group to deliver on its missions increasing awareness of the risks of Modern Slavery to all colleagues and what they can do to stop it. The objective was to create a UK Anti-Modern Slavery Branding and awareness campaign. The outcomes included a fully developed, branded Modern Slavery awareness campaign with strong creative assets, internal comms rollout, multi channel engagement activities, organisational research, and reinforcement of existing mandatory learning and reporting processes. This culminated in activities across Anti-Slavery Week across our head office, distribution centres and stores. We had some positive engagement with our:

- Superdrug Head Office lunch and learn stand in the canteen, facilities by Unseen to raise the impact of Modern Slavery here in the UK.
- Property Contractor Anti-Slavery week fact sheet, this was shared with all our property contractors to highlight the high-risk nature of construction sites, signs to spot and how to support potential victims.

Logistics

We have identified that our logistics network, including our distribution centre, is a potential high-risk area for Modern Slavery or exploitation. This is multi-factorial through the nature of the work involved and those populations of people employed including low-skilled labour, migrant workers, isolated working, high health and safety requirements and the use of agency workers. As a result, a senior member of the distribution team sits on the Modern Slavery steering group, to ensure appropriate oversight and accountability. Through the Modern Slavery Steering Group, we have maintained continued focus on identifying and implementing improvements, to minimise the potential risk of Modern Slavery in the provision of agency labour by third parties.

During 2025 we worked closely with our third-party labour provider to our warehouse to establish a process where they provide a Modern Slavery and exploitation update in the monthly business management review meeting. This report provides a review of their total business potential labour abuse cases and those pertaining to Superdrug. It is provided to our warehouse senior management team with details of the investigations undertaken. This report includes information on their due-diligence checks including identifying risk indicators such as multiple occupants registered at the same address and the use of joint bank accounts, all immediate concerns are reported to us as soon as identified.

In addition, prior to contracting with a third-party labour provider, we ensure that they hold a current certification with a recognised licensing scheme, such as the Gangmasters & Labour Abuse Authority; and to ensure they have adequate internal mechanisms in place through which agency workers can raise any grievances or concerns and that any issues are addressed and escalated as appropriate to our People Team.

Finally in 2025, the logistics team undertook a retrospective review of suppliers, assessing the information held, including Modern Slavery statements and processes in place their businesses. This information will be maintained for all suppliers with continued work to address any gaps identified, supporting them to move into a positive position. Going forward all suppliers invited to tender will provide this information as part of our tender process.

The processes in place to support our distribution colleagues includes:

- Contractual controls requiring all third-party labour providers to comply with the Modern Slavery Act, as outlined in the Supply Chain for Good and Services section.
- Awareness raising measures, including displaying Speak Up and Unseen Modern Slavery & Exploitation Helpline posters throughout the distribution centres. In our distribution centre we have a Health and Safety policy which requires colleagues to communicate in English only.



Demonstrating the Effectiveness of our Anti-Modern Slavery Strategy

Our Steering Group is responsible for setting and reviewing KPIs associated with our Modern Slavery Strategy.

KPI	Goal	Frequency of Tracking	Responsible Owner	Data Collection Process
100% Own Brand Suppliers to have a social audit in place 2025 year: 100%	Ensure suppliers are mitigating risk of Modern Slavery or exploitation	Monthly at Steering Group	Own Brand Technical and QA Team	Internal Audit dashboard
100% of employees have undertaken the mandatory Anti-Modern Slavery Training 2025 year: 89%	Ensure workforce is trained on Modern Slavery risks	Monthly at Slavery Steering Group	People Development Team	Internal training platform
Measure our Employee Engagement 2025 year: 78% Employee Engagement	Listening to our teams, monitoring engagement levels and action taken on the back of feedback	Yearly	People Team	Independent engagement platform

Superdrug Statement Approval

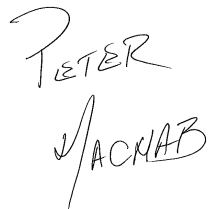
At Superdrug we believe that every individual deserves to live and work free from exploitation. Modern Slavery is a profound violation of human rights, and addressing it requires commitment, collaboration, and transparency.

In 2025, we have continued to strengthen our approach, embedding ethical practices across our operations and supply chain. We know that this is not a challenge that can be solved overnight, nor can it be tackled in isolation. It demands vigilance, innovation, and partnership—qualities that we strive to uphold every day.

I am proud of the progress we have made, but I am equally clear that there is more to do. We will continue to work closely with our suppliers, partners, and organisations such as Unseen to identify risks, support survivors, and drive systemic change. Our goal is simple yet ambitious: to ensure that our business contributes to a world where exploitation has no place.

Thank you to our colleagues, partners, and stakeholders for your dedication to this mission. Together, we can make a meaningful difference and help create a fairer, safer, and more sustainable future for all.

This statement is approved by the Board of Directors of Superdrug Stores plc and signed on its behalf by:



Peter Macnab
Chief Executive Officer
of Superdrug Stores plc
Date: 17th June 2026

