



Published 28<sup>th</sup> June 2024

## 1. About this Statement

This statement has been prepared for publication in accordance with the requirements set out in the following Disclosure Laws:

- Modern Slavery Act 2015 – UK

This statement relates to the activities of Kimberly-Clark Corporation and its applicable subsidiaries that are covered by a Disclosure Law in their respective jurisdictions for the 12-month financial reporting period beginning 1<sup>st</sup> January 2023 and ending 31<sup>st</sup> December 2023. Please see the “Country Specific Elements” section at the end of this statement for information on which specific Kimberly-Clark subsidiaries are covered by this report. Starting from page 9, a “Legislation and Content Map” identifies where in the statement specific reporting criteria are addressed.

### 1.1 About Kimberly-Clark Corporation

Kimberly-Clark Corporation (Kimberly-Clark, or K-C) was founded in 1872 and incorporated in Delaware in 1928. We are a global company focused on delivering products and solutions that provide better care for a better world through product innovation and building our personal care, consumer tissue and K-C Professional brands. We are principally engaged in the manufacturing and marketing of a wide range of products made from natural or synthetic fibers and materials using advanced technologies in fibers, nonwovens and absorbency. Our well-known portfolio of brands, including Andrex, Cottonelle, Depend, GoodNites, Huggies, Kleenex, Kotex, Plenitud, Poise, Pull-Ups, Scott, Softex, Sweety, Thinx, Viva and Wypall, is an indispensable part of life for people in more than 175 countries and holds the No. 1 or No. 2 share position in 70 countries.

We also understand our responsibility to make a positive contribution to the people we serve around the globe, and to the 41,000 people we directly employ and who we rely on to deliver our purpose of Better Care for a Better World.

## 2. Organisation Structure, Operations & Supply Chains

As a global company serving consumers in more than 175 countries and territories, Kimberly-Clark has substantial manufacturing and supply chain operations to ensure we continue to serve our consumers’ needs. In total, we employ 41,000 employees; approximately 55% of whom are involved in manufacturing and distribution. Kimberly-Clark has manufacturing operations in 33 countries across North America, South America, Europe, the Middle East, Asia and Australia, and these are supported by a global distribution network to deliver our products to our wholesaler, distributor, and retailer partners. These partners in turn operate complex supply chains to deliver these products to our end-user consumers.

Across our business, we are supported by over 29,000 suppliers in 118 countries worldwide who not only provide quality raw materials and finished goods, but also support our offices by providing

supplies, software, and services, including marketing and media to help us communicate with customers and consumers.

The direct materials that we buy (the materials and components that go into our finished products) are purchased from nearly 1,800 suppliers in 64 countries and they supply us with a wide variety of raw materials and components; including virgin and recycled fiber, polymers and resins, nonwoven fabrics and poly films, superabsorbent polymer, elastics, hook and loop fasteners, adhesives, and chemicals. Additionally, we also procure primary, secondary and tertiary packaging materials including corrugate containers, cartons, poly wrap, bags, cores, and corestock.

### **3. Our Policies & Commitments related to Modern Slavery**

In this statement, modern slavery is defined to include all aspects of modern slavery covered by the Disclosure Laws, including human trafficking, forced labour, and child labour. Our global corporate purpose - Better Care for a Better World - encapsulates our approach as a responsible corporate citizen; to be even better in the areas that deliver value to our stakeholders by providing better products, contributing to a better planet, creating a better workplace, and fostering a better society. A key component of this is making efforts to protect the rights of workers across our operations (including all subsidiaries) and supply chain. We believe that all workers should be treated with respect and in accordance with our workplace and human rights standards. To support this work, we have a strong Human Rights policy framework covering key issues related to modern slavery. Given the scale and nature of these issues, Kimberly-Clark takes a global approach, setting high standards that apply to all of our subsidiaries, operations, business areas and our global supply chain.

Kimberly-Clark's [Code of Conduct](#) outlines our Corporate standards around ethics, compliance and business integrity for all Kimberly-Clark employees and sets expectations and requirements around the way employees work both with each other and with external stakeholders, as well as how we operate our business to the highest ethical standards.

We have a separate, stand-alone [Human Rights Policy](#) that establishes the company's expectations, provides guidance and creates accountability for our people with respect to human rights and other ethical concerns, and this applies both within our own operations and to our suppliers.

Our Human Rights policy is augmented and supported with the published [Supplier Code of Conduct](#) and [Supplier Social Compliance Standards](#) (SSCS). We expect our suppliers to follow the SSCS as an integral part of the Supplier Code of Conduct. The SSCS are aligned with key international standards including the ILO's Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, the UN Global Compact, and the Ethical Trading Initiative's ETI Base Code. The SSCS specifically set forth our principles and procedures to hold suppliers and contractors accountable for combatting modern slavery,, as well outlining requirements for other labour standards areas.

Suppliers must evaluate and address risks of human trafficking or forms of modern slavery in their operations and supply chains and they must not produce goods or services using any form of forced, bonded, indentured, involuntary convict, compulsory, or child labour. Suppliers are required to comply with all applicable laws and regulations in the countries and regions in which they operate as well as the SSCS mentioned above. Suppliers acknowledge and agree to the SSCS as part of their contracts with Kimberly-Clark, and new vendors are also provided with the SSCS during the vendor on-boarding process and acknowledge acceptance of these terms. By agreeing to the SSCS, suppliers certify that

their materials are produced in compliance with laws relating to modern slavery (including human trafficking, forced labour, and child labour). The SSCS is available on Kimberly-Clark’s website in 10 languages.

The policy framework we have is regularly evaluated to ensure it reflects evolving risks, and a thorough review of the Human Rights Policy was undertaken in 2023. An updated Human Rights Policy was launched in 2024, with accompanying updates to the SSCS to also be launched later in 2024.

#### 4. Operational and Supply Chain Risks

The diversity of the products, geographic locations, markets, and regulatory systems associated with our supply chain can pose a range of risks arising from the countries in which these suppliers are based and/or the types of goods or services they provide (including their sourcing of raw materials). Addressing these risks through a systematic approach to our procurement processes, practices and dealings with suppliers is an essential element of progressing the global eradication of modern slavery.

On an annual basis we identify and review geographies and commodities with high human rights risks, including potential modern slavery risks, using a number of sources. The principal operational tool we use for this is LRQA’s EiQ Analyze platform and the associated risk indices, which supports supplier segmentation and prioritisation of appropriate supplier due diligence. In addition, we use EiQ Sentinel for identifying public reports and concerns as well as utilising relevant public data and databases, including the U.S. State Department Trafficking in Persons Report and the U.S. Department of Labour’s List of Goods Produced by Child Labour or Forced Labour. Based on these sources the sourcing regions with elevated human rights risks include South, Southeast and North Asia, Middle East, Sub-Saharan Africa, and Central and South America. Operations and suppliers assessed to have elevated human rights risks are prioritised for additional due diligence.

In addition to the on-going identification of operational risks in our global supply chain, we also periodically conduct a broader review of salient human rights risks for Kimberly-Clark and its subsidiaries. The previous review undertaken by our Supply Chain Human Rights team, in consultation with approximately 50 diverse internal stakeholders, identified the following potential salient human rights risks within our supply chain and prioritized these based on their likelihood, severity and the ability to remedy them.

Salient Human Rights Issue	Key Concerns	Focus Geographies	Mitigations
Forced Labour	Worker-paid recruitment fees; passport retention; excessive overtime	Southeast Asia, Taiwan, Middle East	Enhanced due diligence in risk countries; participation in multi-stakeholder platforms on forced labour
Child Labour	Continued risk of exploitation of children upstream in value chains	Global	Social compliance audits
Occupational Health & Safety	Workplace injuries & fatalities	Global	Social compliance audits, EHS program enhanced diagnostics and training

Discrimination & Harassment	Workplace Discrimination; Harassment & Bullying	Global	Global anti-discrimination policy; social compliance audits and training
Wages & Benefits	Compliance with minimum wage laws; Living Wages	Global	Social compliance audits
Indigenous & Land Rights	Legal or customary rights to land; protect people's livelihoods	North, Central & South America	Fiber procurement policy; certified fiber sourcing
Access to Water & Sanitation	Water access; water quality; access to improved sanitation	South America; Middle East & Africa; South & Southeast Asia	Environment policy; Water initiatives in high water stressed regions
Environmental Issues	Impacts of Climate Change; Impacts of Product/Packaging waste on vulnerable communities	Global (climate change); Emerging economies (waste)	Environment policy; plastics & packaging reduction strategy; waste picker initiatives

Human rights risks that are identified are regularly discussed at senior leadership level in Kimberly-Clark's Responsible Sourcing Steering Committee. This Committee consists of senior representatives from our sustainability, procurement, external contract manufacturing, legal, labour relations, and human resources teams and K-C's regional organisations. The committee meets at least quarterly and supports the identification of emerging human rights issues, escalations, and responses.

## 5. Due Diligence & Social Audits

### 5.1 Due Diligence

Kimberly-Clark has implemented a robust due diligence process in order to identify, mitigate and remediate potential modern slavery issues, as well as other labour standards concerns. This due diligence process is part of our Supply Chain Human Rights programme – whereby key suppliers and Kimberly-Clark operations are regularly assessed to determine which will be subject to further evaluations or social audit requirements.

New suppliers in relevant procurement categories are assessed for human rights risks during the supplier onboarding process through K-C's Vendor Due Diligence system. As part of this process suppliers are asked to complete a social compliance self-assessment questionnaire and acknowledge K-C's Supplier Code of Conduct and SSCS. The information we collect in the questionnaire helps to inform a supplier risk assessment, and new suppliers that present elevated human rights risks based on this risk assessment are subject to additional due diligence requirements that may include third-party social audits.

Existing suppliers are subject to the same due diligence process on an on-going basis, but with the additional factor that previous due diligence and audit performance is factored into the risk rating assigned to those suppliers. Depending on the supplier's risk rating, assessments and third-party social audits may be renewed periodically.

## 5.2 Social Audits

Where a social audit is a due diligence requirement, the audit must be conducted by third-party audit firm; most often on an announced or semi-announced basis. In the event that there may be issues of concern that warrant investigation, Kimberly-Clark will conduct unannounced audits at supplier sites and K-C reserves the right to visit production sites with limited or no notice.

Audits are conducted on a regular basis, with frequency partly determined by the risk profile of the site. Suppliers and production sites in higher risk industries and geographies are prioritised for more frequent oversight.

Kimberly-Clark has a preference for audits conducted by Association of Professional Social Compliance Auditors (APSCA) accredited audit firms and auditors. Audits for K-C must be conducted to an industry-standard methodology – including the ELEVATE Responsible Sourcing Assessment (ERSA) protocol, Sedex Member's Ethical Trade Audit (SMETA) audit standard, Responsible Business Alliance Supplemental Validated Audit Process (SVAP) on Forced Labour or equivalent protocols. However, we may consider certain other third-party audit standards conducted on behalf of other members of AIM-PROGRESS, under the principle of mutual recognition. All of these audit methodologies support the detection of findings related to modern slavery. In addition, Kimberly-Clark deploys enhanced forced labour diagnostic assessments as needed for suppliers and own sites in high-risk geographies or industries or where otherwise warranted.

## 6. Remediation

### 6.1 Approach to Remediation

We believe strongly that working with suppliers to improve their practices is the most effective way for us to mitigate and remediate risks and to improve the lives of the people working in their facilities. In line with international standards when a supplier is found not in compliance with our SSCS, Kimberly-Clark engages with the supplier to develop a corrective action plan. Depending on the concerns raised, corrective actions could include supplier investments in infrastructure, equipment, or training; development of new policies or procedures; or provision of remedy for affected workers.

Findings related to potential modern slavery risks are treated with priority and with a requirement of prompt and full remediation. Any findings in this area require that the actions and changes implemented to address the issues are evaluated and verified in a further on-site assessment.

If needed, Kimberly-Clark may provide support to the supplier by sharing good practice examples or connecting them with consultants or other expert resources. We track completion of the agreed corrective action plans through evidence provided by the relevant supplier and/or through a follow-up audit. In the event that the identified issues continue unresolved, or if we are not satisfied with the remediation efforts undertaken or the audit results, we may exit a supplier for continued non-compliance.

## 6.2 2023 Findings & Remediation

Through our social audit process, we identified 20 findings of potential forced labour indicators at 16 facilities, and no indicators or instances of child labour. As outlined above, findings observed in social compliance audits are subject to corrective action and remediation requirements.

At the end of the reporting period 4 findings were remediated, closed and verified as closed. 8 findings had been remediated and were pending a follow-up audit to verify closure. A further 5 findings were in open pending remediation & closure in 2024. With respect to the final 3 findings (identified at one supplier site), the supplier committed to a remediation plan however Kimberly-Clark exited from the supplier in 2023 prior to the completion of remediation.

At the time this statement was prepared, 6 findings were remediated, closed and verified as closed. 7 findings had been remediated and were pending a follow-up audit to verify closure. A further 4 findings were open pending remediation & closure in 2024. With respect to the final 3 findings (identified at one supplier site), the supplier committed to a remediation plan however Kimberly-Clark exited from the supplier in 2023 prior to the completion of remediation.

Kimberly-Clark did not identify any impact to the incomes of the most vulnerable families as a result of any measures taken to eliminate the use of forced labor or child labor in its activities and supply chains. Accordingly, Kimberly-Clark did not introduce any measures to remediate such loss of income.

## 7. Grievance Mechanisms & Reporting

Kimberly-Clark implements a grievance mechanism to:

- i. Allow for reporting without fear of retaliation;
- ii. Identify and monitor potential human rights risks to our workers in our operations and supply chain; and
- iii. Mitigate the risk of modern slavery and other social and labor issues occurring in our supply chain.

Employees, business partners and third parties are encouraged to report any ethical concerns through Kimberly-Clark's Code of Conduct HelpLine. The HelpLine provides a consistent approach to raising grievances or asking questions. When concerns are raised through the K-C HelpLine, they are assigned to a case leader to assess and investigate per K-C's HelpLine reporting policy and procedures. Reports made through the HelpLine may be made anonymously and are subject to our non-retaliation policy. Our reporting and investigation process is available for stakeholders to raise issues related to potential modern slavery risks, as well as other ethical or Code of Conduct concerns. For more information visit our Code of Conduct [webpage](#).

## 8. Training on Modern Slavery

Kimberly-Clark provides training on modern slavery for employees and managers with direct responsibility for our supply chain, including procurement buyers and teams managing external contract manufacturers. The training includes a focus on identifying and mitigating risks.

Through our procurement learning and development curriculum, we also offer sustainability-related training content including on environmental, social and governance issues as well as coverage of human rights risks in supply chains. We also support the development of greater understanding around modern slavery-related supply chain risks in smaller, targeted training sessions with individual procurement leaders or groups. These sessions focus on specific risks identified or relevant for the procurement categories or territories related to the individuals being trained.

In addition, through our membership of organisations like AIM-PROGRESS, we continually seek to build supplier knowledge and capability on human rights issues. Kimberly-Clark is a member of the AIM-PROGRESS, in which we collaborate with other companies on development of responsible recruitment best practices.

## **9. Measuring Effectiveness**

To measure the effectiveness of steps being taken, we track the number and types of non-compliances identified and closed and assign scores to suppliers and Kimberly-Clark sites based on audit performances to help managers understand the risk profile of their suppliers or sites. This data is reviewed at least quarterly by the Responsible Sourcing Steering Committee. We also publish summary results of our audit program in our annual Global Sustainability Report.

We will continue to assess the effectiveness of our Supply Chain Human Rights program and identify opportunities for improvement on an ongoing basis.

# UK-SPECIFIC ELEMENTS

## About the Reporting Entity

For the purposes of the Modern Slavery Act 2015, the report entities are: Kimberly-Clark Limited, Kimberly-Clark Europe Limited and Kimberly-Clark European Services Limited. These are the UK entities supporting the sales, distribution and manufacturing operations for Kimberly-Clark. We have been operating in the UK & Ireland close to 100 years and we employ approximately 1,200 people across the UK, all working together to deliver 'Better Care for a Better World'. Kimberly-Clark operates 3 manufacturing locations in the UK & Ireland – in Barrow-in-Furness, Flint and Northfleet.

## Statement Development & Review

This Statement has been developed through a process of consultation involving officers and senior managers of Kimberly-Clark Corporation, Kimberly-Clark Limited, Kimberly-Clark Europe Limited, Kimberly-Clark European Services Limited, in the course of which the participants have had the opportunity to have input into, and to approve, the content of this Statement. References in this statement to “Kimberly-Clark” include the UK reporting entities, as well as Kimberly-Clark Corporation and its affiliates, due to our global approach towards the identification and mitigation of modern slavery risks.

## Approval and Signature

This disclosure seeks to meet reporting obligations under the UK Modern Slavery Act 2015 and has been approved on 20 June 2024 by the directors of the following legal entities:

- Kimberly-Clark Europe Limited
- Kimberly-Clark European Services Limited
- Kimberly-Clark Limited



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Doug Cunningham – President, EMEA Consumer Business and Director of Kimberly-Clark Europe Limited, Kimberly-Clark European Services Limited, and Kimberly-Clark Limited

## Legislation & Content Map

The sections of the Statement that specifically address what we have done to align with recommended reporting guidance for s. 54 of the UK Modern Slavery Act 2015.

Recommended reporting criteria	Section(s)
Organisation structure, business and supply chains	<ul style="list-style-type: none"><li>• <a href="#">About Kimberly-Clark Corporation</a></li><li>• <a href="#">Organisation Structure, Operations &amp; Supply Chains</a></li><li>• <a href="#">About the Reporting Entity – UK</a></li></ul>
Policies in relation to slavery and human trafficking	<ul style="list-style-type: none"><li>• <a href="#">Our Policies Related to Modern Slavery</a></li></ul>
Due diligence processes in relation to slavery and human trafficking in operations and supply chain	<ul style="list-style-type: none"><li>• <a href="#">Due Diligence &amp; Social Audits</a></li></ul>
Operations and supply chains where there is a risk of slavery and human trafficking taking place, and steps taken to assess and manage that risk	<ul style="list-style-type: none"><li>• <a href="#">Operational and Supply Chain Risks</a></li></ul>
Effectiveness in ensuring that slavery and human trafficking is not taking place in operations or supply chains, measured against such performance indicators considered appropriate;	<ul style="list-style-type: none"><li>• <a href="#">Remediation</a></li><li>• <a href="#">Measuring Effectiveness</a></li></ul>
The training and capacity building about slavery and human trafficking available to staff	<ul style="list-style-type: none"><li>• <a href="#">Training on Modern Slavery</a></li></ul>