

2025 Modern Slavery & Human Trafficking Policy Statement



Introduction

Safic-Alcan UK Limited (SAUK) has published this statement of compliance in accordance with Section 54 of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulation 2015 hereby referred to as “the Modern Slavery Acts”. The statement sets out the steps taken by SAUK during the financial year ending 31st December 2024, and our 2025 strategy, to prevent modern slavery and human trafficking in its United Kingdom business operations and international supply chains.

Meaning of Slavery & Human Trafficking

Our understanding of slavery and human trafficking is based on the definitions set out in the Modern Slavery Acts, the UN Universal Declaration of Human Rights and the adopted International Labour Organisation (ILO) convention related to forced or compulsory labour.

We recognise that modern slavery is a complex issue affecting all sectors, regions and economies and understand that the term is used to denote (1) human trafficking, (2) forced labour and slavery-like practices such as (3) debt bondage, and the (4) sale or exploitation of children.

- 1) Human Trafficking is the act of recruiting, transporting, transferring, harbouring or receiving a person, through any coercive means for the purpose of exploitation.
- 2) Forced Labour is work or service that is taken from a person under the menace of a penalty and for which the person has not offered themselves voluntarily.
- 3) Debt Bondage is a worker pledging their labour or the labour of others under their control as security for a debt, when either the real value of the work undertaken is never applied to repayment of the debt, or the length or nature of the work that must be undertaken is never fully defined or limited.
- 4) Sale and Exploitation of children involves situations where children are transferred by one person to another for remuneration or other consideration.

Our Organisation

The structure of SAUK comprises two divisions. The Performance Products Division carries out manufacturing and distribution of chemicals. Our Life Sciences Division does not manufacture but engages key principals to serve our customers within an international distribution network.

We directly hire our employees typically using established recruitment firms and we work with approved sub-contracting companies when third-party services are required. We are a growing business and investment in our UK manufacturing and distribution operations is directed so we have the resources to maintain fair employment practices and to carry out due diligence within our supply chain.

Our two SAUK sites are based in the United Kingdom.

Head Office (Finance, Sales and Purchasing)
812 Fountain Court
Warrington
WA3 7QZ

Plant (Manufacturing, Repacking & Warehousing)
Unit 6 Withins Road
Haydock Industrial Estate
Haydock
WA11 9UD

Supply Chain

The SAUK supply chain consists of products, materials and services from the UK, European Union and international companies from further afield. These companies may be raw material suppliers, producers of finished goods, traders and service providers. Some of our suppliers facilitate our non-stock distribution services.

Our customer base spans across numerous business sectors and are generally traders or industrial end-users. We enjoy a relatively stable demand with limited seasonality and as such, our labour force at each of our sites are employed full time. This stability extends to our supply chain partners and when combined with strategic forecasting and prompt payment for goods and services, this helps our suppliers maintain successful operations.

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Our Policies Related to Modern Slavery Ethics

Slavery and human trafficking are abuses of a person's freedoms and rights. We are totally opposed to exploitation in our direct operations, indirect operations and supply chain and can confirm no labour is provided to the company in the pursuance of its services by means of slavery or human trafficking.

The Staff Handbook is issued to all employees and comprehensively documents the ethical framework to which the company adheres. The following ethical and human rights policies are outlined in the handbook.

- Equality, Diversity and Inclusion
- Bullying, Harassment and Victimisation
- Statutory Rights (Maternity, Paternity, Parental, Leave etc.)
- Anti-Bribery
- Disciplinary
- Grievance
- Conduct at Work / Outside Working Hours
- Recruitment, Selection and Career Development
- Whistleblowing
- Training

Risk Assessment, Due Diligence & Management

The Safic-Alcan Group has established an Environmental, Social & Governance (ESG) team comprising the Global ESG Manager, ESG Project Manager and administrators. This team supports our UK senior management and regulatory compliance teams in this important area to encourage, influence and assist our suppliers, service providers and customers to improve their own sustainability practices. This is at the very heart of our Durable Link ESG strategy where we pursue effective collaboration in the supply chain to drive positive impacts, reduce risk and implement due diligence initiatives.

The following programmes are some of the risk appraisal and due diligence measures in place to control the risk of not performing in accordance with the Modern Slavery Acts:

EcoVadis - We have partnered with EcoVadis for sustainability monitoring, using their universal scorecard, benchmarks, and performance improvement tools. This monitoring focuses on four areas: environment, labour and human rights, ethics, and sustainable procurement. Suppliers are assessed against all aspects of their treatment of their people, including a requirement to provide evidence of how they guard against modern slavery. To achieve and maintain our Platinum Award for the past two years, SAUK has demonstrated commitment to ethical corporate governance and fostering partnerships with similarly principled organisations. EcoVadis has evaluated the company's performance, determining it to be in the top 1% of all other participants globally.

Third-Party Code of Conduct (3rd Party CoC) - Our 3rd Party CoC must be agreed to and signed off on by our suppliers. We had a response rate of 98% of our suppliers either signing our 3rd Party CoC acknowledgement, or in a few cases provided their company code of conduct for our review.

RSPO Certification - Responsible sourcing and traceability is of utmost importance to SAUK as some of our sourced materials contain components which are derived from palm/palm kernel oils which may be associated with the risk of unfair trade arrangements and human rights breaches. Recognising the importance of sustainable palm oil throughout our supply chain, the company continues to support industry efforts to maintain sustainable palm sourcing to help the environment and create a positive difference for workers, farmers and local communities by its commitment to remain an active RSPO member. In 2024, we were certified to sell Segregated material, further improving traceability of the ethical business practices in our supply chain.

Know-Your-Customer (KYC) – Our KYC programme focuses on verifying the identity of customers to prevent illegal business activities. While KYC itself is not specifically fixed on labour laws or modern slavery principles, it indirectly supports these areas by ensuring that we engage with legitimate and compliant entities.

Self-Assessment Questionnaire for Modern Slavery (SAQ) – SAUK continually seeks to identify and mitigate the risk of slavery and human trafficking in our supply chain. This involves engaging our suppliers to ensure they are aligned with the Modern Slavery Acts. Our suppliers are required to complete a supplier SAQ on modern slavery. They are asked to confirm they fully

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understand and comply with the requirements of the Modern Slavery Acts and have obtained supporting evidence to demonstrate their own supply chains employ ethical business practices.

Upon receipt of the completed SAQ, it is reviewed. If a potential issue is identified a supplier audit may be initiated to evaluate their compliance with the Modern Slavery Acts. If non-compliance is found the supplier would no longer be approved and would be removed from active status until appropriate corrective action is taken.

Reporting Concerns

We have well-established processes which prohibits modern slavery and breach of labour laws and encourages the reporting of concerns and the protection of whistle blowers. The reporting procedure is clearly documented within the Code of Conduct, the Employee Handbook and group Human Resources Policy. SAUK will not support or conduct business with any organisation knowingly or unknowingly involved in slavery or human trafficking.

Code of Conduct

The purpose of our Code of Conduct is to provide a clear framework for ethical behaviour and decision-making within our organisation, and to ensure that all employees understand and adhere to consistent standards promoting fairness, integrity and respect. It also helps SAUK demonstrate that it complies with its obligations and takes appropriate actions toward identifying and mitigating risk. We regularly update our Code of Conduct to provide clarity on the values and principles that are essential for accomplishing our ethical business objectives.

Supply Chain Performance

Up to the present time, no evidence has been found through our various initiatives that would substantiate the occurrence of modern slavery within the SAUK supply chain. We are fully committed to supporting and implementing policies and procedures to ensure this trend is maintained and to do our part to eradicate unethical business practices.

Training

SAUK expects a high level of understanding from its employees about the risks of modern slavery and human trafficking in our supply chains. The company provides Modern Slavery Act information to all members of staff, senior management and the supply chain, to drive compliance to these regulations.

2025 Objectives

- We are committed to the review and enhancement of our data collection and analysis process and will be focussed on augmenting our KYC programme.
- We will ensure that this policy is sufficiently communicated, including the update of the current version on the company website.
- We will maintain the supplier onboarding process ensuring all new suppliers give written acknowledgement of their compliance with the Modern Slavery Acts.
- We will continue developing systems and tools to enhance our management processes.
- We will remain committed to our Code of Conduct and seek to further embed these principles within our business, as well as across our supply chain.

This statement is made pursuant to the Modern Slavery Acts and constitutes SAUK's modern slavery and human trafficking statement for the current financial year.

Approved by	Mr Barry McDonnell Managing Director Safic-Alcan UK Limited
Signature	
Date	01 January 2025