

# 2026 Modern Slavery & Human Trafficking Policy Statement



## Introduction

Safic-Alcan UK Limited (SAUK) has published this statement of compliance in accordance with the Modern Slavery Act 2015 and Section 54 of the Act, Transparency in Supply Chains. The statement sets out the steps taken during the financial year ending 31 December 2025 to prevent modern slavery and human trafficking in SAUK's business operations and international supply chains and describes our ongoing approach to eliminating unethical business practices.

## Slavery & Human Trafficking

Our understanding of slavery and human trafficking is as defined in the Modern Slavery Act, 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 the term is used to denote human trafficking, forced labour and slavery-like practices such as debt bondage, and the sale or exploitation of children.

**Human Trafficking** is the act of recruiting, transporting, transferring, harbouring or receiving a person, through any coercive means for the purpose of exploitation.

**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.

**Debt Bondage** is a worker pledging labour as security for a debt, when either the real value of the work undertaken is never applied to debt repayment or the length or nature of the work that must be undertaken is never fully defined or limited.

**Sale and Exploitation** of children involves situations where children are transferred by one person to another for remuneration or other consideration.

## Our Organisation

SAUK comprises our Performance Products Division which carries out the manufacturing and distribution of chemical products, while our Life Sciences Division does not manufacture but engages key principals to serve our international distribution network. There are several support departments within the company including Human Resources, Finance, SHEQ and Compliance.

We promote employees internally, hire using reputable recruitment firms and work with approved contractors when third-party services are required. As a growing business, we invest in our manufacturing and distribution operations to ensure we have the resources to uphold fair employment practices and conduct due diligence across our supply chain.

Our two SAUK sites are based in the United Kingdom.

**Head Office** (Finance, Sales & 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 involves products, raw materials and services originating in the UK, European Union or worldwide. The upstream supply chain includes manufacturers, principals, suppliers, distributors, traders and service providers. Non-stock distribution services are available from some principals and suppliers.

Our customer base spans numerous business sectors but are typically 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 is 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 supply chain maintain successful operations and invest in ethical business measures.

## 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.

Our **Code of Conduct** provides a clear framework for ethical behaviour and decision-making within our organisation and ensures that all employees understand and adhere to consistent standards promoting fairness, integrity and respect. Our code demonstrates that SAUK understands its ethical obligations to prevent modern slavery 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.

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The [Staff Handbook](#) is issued to all employees and 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
- Statutory Rights
- Conduct at Work
- Whistleblowing
- Bullying, Harassment and Victimisation
- Anti-Bribery
- Recruitment, Selection and Career Development
- Training
- Disciplinary
- Grievance

## Risk Assessment, Due Diligence & Management

Safic-Alcan Group has established an Environmental, Social & Governance (ESG) team comprising the Global ESG Manager, ESG Project Manager and administrators. This team supports the UK senior management and regulatory compliance teams in the important area of ESG 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 ensure compliance with the Modern Slavery Act:

We have partnered with [EcoVadis](#) for appraising our ESG performance focused on four areas: environment, labour and human rights, ethics, and sustainable procurement. For the past three years, EcoVadis has awarded SAUK the Platinum Award meaning we are in the top 1% of all other participants globally. To maintain this level of recognition SAUK demonstrated its commitment to ethical corporate governance and fostering partnerships with similarly principled organisations. SAUK has now joined the Group assessment to better contribute to a consolidated group wide approach.

As part of our commitment to ethical business practices, all external partners are required to adhere to our [Third-Party Code of Conduct](#) which sets the standards we expect from our suppliers and principals. We ask that our partners review and understand the requirements outlined in the Code of Conduct, comply with its provisions and sign and return the acknowledgment form confirming acceptance of these obligations.

Responsible sourcing and traceability are important to SAUK, as some of our products contain palm or palm kernel oils; material which has in some cases been linked with unfair trade arrangements and human rights breaches. Recognising the importance of avoiding unethically derived palm oil in our supply chain, our company seeks to maintain sustainable sourcing to positively impact workers, farmers and local communities through commitment to its [RSPO Certification](#) and associated processes. We are certified to sell Segregated material, further improving traceability in our supply chains.

Our [Know-Your-Customer \(KYC\)](#) programme is driven by our end-use verification process checking the identity of customers and how they will use our products, to prevent illegal business activities. While KYC itself is not specifically focussed on labour laws or modern slavery principles, it indirectly supports these areas by ensuring we engage with legitimate and lawful entities.

SAUK continually seeks to identify and mitigate the risk of slavery and human trafficking in our supply chain. This involves engaging our suppliers and principals to ensure they are aligned with the Modern Slavery Act. Our partners may be required to complete a [Self-Assessment Questionnaire for Modern Slavery \(SAQ\)](#) where they are asked to confirm they fully understand and comply with the requirements of the Modern Slavery Act and have obtained supporting evidence to demonstrate their own supply chains employ ethical business practices.

Up to the present time, no evidence has been found through our various [Supply Chain Performance Monitoring](#) schemes 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.

## Reporting Concerns

We have well-established processes which prohibit modern slavery and breach of labour laws and encourage 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.

## 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 uphold compliance to these regulations.

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## 2026 Objectives

We pledge to:

- effectively communicate this policy to all stakeholders. This includes updating the policy on the company website.
- enhance our data collection and analysis processes and augment our KYC programme.
- actively seek confirmation from our partners regarding their commitment to ethical business practices.
- continue developing our management systems and tools to enhance our processes.
- remain committed to our Code of Conduct and to further embed these principles in our business and across our supply chain.

This statement is in accordance with the Modern Slavery Act and serves as Safic-Alcan UK Limited's modern slavery and human trafficking policy statement for the current financial year. It reflects our ongoing efforts to prevent modern slavery and human trafficking within our operations and supply chains. This statement will be reviewed annually.

<b>Approved by</b>	Dawn Goff Managing Director of Safic-Alcan UK Limited
<b>Signature</b>	
<b>Date</b>	01 January 2026