

Safic-Alcan UK Limited 2024 Statement of Compliance **Modern Slavery and the Supply Chain**

This statement has been published in accordance with section 54 of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in supply Chains) Regulation 2015 (the "Act").

It sets out the steps taken by Safic-Alcan UK Ltd during the financial year ending 31st December 2023 to prevent modern slavery and human trafficking in its business and supply chain.

Meaning of Slavery and Human Trafficking

Our understanding of slavery and human trafficking is based on the definitions set out in the Modern Slavery Act 2015 and is guided by the UN Universal Declaration of Human Rights and the convention of the international Labour Organisation, particularly 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 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 of children.
- 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 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 has to 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.

About Safic-Alcan UK Limited

Safic-Alcan UK Ltd is a manufacturer and distributor of chemicals and also operates a Life Science Division with key partners within a distribution network.

We operate out of two locations within the UK. We directly employ staff and operatives, as well as using regular sub-contracting companies. Safic-Alcan UK Ltd continued investment in UK manufacture ensures that we can provide solutions that meet increasingly stringent performance and design requirements.

Structure

This statement represents the views, practices of Safic-Alcan UK Limited, and covers the following UK Sites.

Safic-Alcan UK Limited
812 Fountain Court
Warrington
WA3 7QZ

Safic-Alcan UK Limited
Unit 6 Withins Road
Haydock Industrial Estate
Haydock, WA11 9UD

Head Office, Finance, Sales and Purchasing

Manufacturing and repacking plant for Chemical Distribution

Supply Chain

The Safic-Alcan UK Ltd supply chain consists of products and materials supplied from UK, EU and international companies. These companies may be raw material suppliers, third party producers of finished goods for resale and non-stock items and services.

As our customer base spans over numerous sectors, 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 also extends to the demand made on our supply chain partners, which when combined with strategic forecasting plus prompt payment for goods and services, means we can assist our suppliers in effectively managing their operation.

Safic-Alcan UK Limited Policies – Related to Modern Slavery Ethics

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

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.

- Maternity Rights Policy
- Paternity Rights Policy
- Anti-Bribery Policy
- Harassment Policy
- Discipline Policy
- Grievance Policy
- Code of Conduct Policy
- Whistleblowing Policy
- Recruitment and Selection Policy

Risk Assessment and Due Diligence

Safic-Alcan has recruited at Group level a Global Environmental, Social & Governance (ESG) Manager. In this senior leadership position, this person directs and coordinates our activities in this important area to encourage, influence and assist our suppliers to improve their own sustainability practices. This is at the very heart of SDG 17, Partnership for Goals where effective collaboration in the supply chain results in a greater positive impact.

A recent project coordinated by the Group ESG Manager has been to reach out to each supplier and seek written confirmation of complying with the Group Code of Conduct.

Supplier Due Diligence – 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.

In order to achieve and maintain our Platinum Award for two years running, Safic-Alcan UK Ltd has demonstrated commitment to protecting the environment, supporting local communities and ethical corporate governance. EcoVadis has evaluated the company's performance, determining it to be in the top 1% of all other participants globally.

RSPO Certification

Responsible sourcing and traceability is of utmost importance to Safic-Alcan UK Ltd as some of our sourced materials contain components which are derived from palm/palm kernel oils which can be associated with the risk of deforestation, habitat loss and human rights issues.

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.

As part of our initiative to identify and mitigate risk

Safic-Alcan UK Ltd continually seeks to identify and assess potential risk areas, mitigate the risk of slavery and human trafficking and monitor potential risk areas in our supply chain.

All suppliers are required to complete a supplier Self-Assessment Questionnaire for Modern Slavery. They are required to confirm that they fully understand and comply with the requirement of the Modern Slavery Act 2015 within their own operation, and they have taken steps to ensure their own supply chains are free of risk and can supply supporting evidence.

Upon receipt of the completed Self-Assessment Questionnaire the data supplied is reviewed. From the data a full supplier audit maybe instigated to determine if there is a breach in adherence to the Modern Slavery Act 2015, which would prompt their removal from active supplier status.

We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

The company will not support or deal with any business knowingly involved in slavery or human trafficking.

Assessment Results

To date no evidence has been found that would substantiate the presence of Modern Slavery within Safic-Alcan UK Ltd supply chain.

Safic-Alcan UK Ltd are fully committed to supporting and implementing policies and procedures to eradicate this issue.

Next Steps (to be completed by the end of 2024)

- We are committed to review and enhance our data collection and analysis process.
- We will ensure that this policy is sufficiently communicated, including the update of the current version on the company website.
- We will improve the supplier onboarding process ensuring all new suppliers give written acknowledgement of their compliance with the Modern Slavery Act.
- We will continue developing knowledge, awareness and tools via the Walk Free Foundation to enhance our processes.

Training - Code of Conduct

Everyone, whether a colleague, or agency worker, completes mandatory Code of Conduct Induction and agrees to comply with it and so uphold our values and ethics.

The purpose of our Code of Conduct is to define how we demonstrate to all our stakeholders that our colleagues behave in line with our Ethical Policy and Guiding Values, to deliver the right customer outcomes and comply with the regulatory requirements. It also helps Safic-Alcan UK Ltd demonstrate that it complies in full with its obligations and takes appropriate attitudes to risk. We regularly update our Code of Conduct to provide clarity on the roles and responsibilities of our leaders and colleagues, underpinned by our values and ethics.

To ensure a high level of understanding the risks of modern slavery and human trafficking in our supply chains and our business we provide training to members of staff senior management and the supply chain to drive compliance with these regulations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Safic-Alcan UK Ltd's human trafficking statement for the current financial year.

Approved By: Managing Director - Safic-Alcan UK Limited

Signature:



Print Name: Barry McDonnell

Date: 01 January 2024