

## **Modern Slavery Statement**

This statement is made in accordance of the Modern Slavery Act 2015 and identifies steps that IMCD UK Ltd has taken to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. IMCD UK Ltd has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery within our business or supply chain.

### **Our Business**

IMCD UK Ltd is part of IMCD Group – a global leader in the international sales, marketing and distribution of speciality chemicals and food ingredients. Worldwide in 2016, IMCD Group employed over 1800 staff in more than 40 countries.

IMCD UK Ltd employs approximately 135 staff based in Sutton, Surrey. Chemicals are supplied to 28 different market sectors.

### **Our Suppliers and Supply Chain**

IMCD Group has a policy to work only with manufacturers who are leaders in their respective fields. These manufacturers must have a level of formal quality accreditation of at least ISO9001 or equivalent and be compliant with all national legislations with regard to working practices.

The majority of suppliers represented by IMCD UK Ltd are based in Europe or USA however companies based in India, China and Far-East are also represented.

Due to the global nature of our business IMCD UK recognizes that we are exposed to the risk of slavery and human trafficking in our business operations and supply chain. The risk level varies dependent on geographic location and the degree of supplier assessment needed is managed accordingly.

IMCD has a policy in place to assess every new supplier but also existing suppliers are assessed on the basis of a risk based approach taking into account product characteristics, supply chain procedures and industry developments.

IMCD neither engages in nor supports the use of forced, bonded or involuntary labour or child labour. IMCD therefore complies with the standards of the International Labour Organisation and the minimum age requirements in all countries in which IMCD conducts business.

IMCD Group has a formal policy, detailed in the Code of Conduct available on the internet, to work only with suppliers who comply with the same or similar standards of the International Labour Organisation.

Warehousing and logistics are carried out by 3<sup>rd</sup> party contractors who are subject to regular reviews and audits from IMCD staff.



## Our Policies

As a part of IMCD Group, IMCD UK Ltd has a key commitment and core principle to create a culture that will stimulate honesty, transparency, sustainability, compliance, expertise and cultural diversity. IMCD Group's success is based on providing an environment that promotes trust, confidence and respect of its employees, suppliers, customers, local and international stakeholders, media, governmental authorities and other third parties.

This ethos has created a culture where integrity is essential to the way IMCD UK Ltd does business and where unethical behaviour will not be tolerated. It is this culture that has been summarised in the IMCD Group Code of Conduct, available to view on the group website, describing IMCD Group's core values and business ethics to which all IMCD Group companies worldwide are equally and fully committed.

The Code of Conduct is a summary of group policy of business principles setting out the ground rules of the organisation's ethical behaviour and how IMCD Group will operate towards its business partners and other stakeholders. It is a resource that is intended to alert employees of significant legal and ethical issues that may arise. It supports IMCD Group's continual effort to create a constructive and efficient working environment where people feel confident to make decisions, raise concerns and seek advice. In order to facilitate that all IMCD Group employees comply with its values and ethics, IMCD Group has introduced an Internal Alert Procedure. This procedure enables IMCD Group employees worldwide to report any irregularities regarding the implementation of applicable IMCD Group business principles, or any of its legal, operational or other issues that concern IMCD Group as a whole, a respective local subsidiary or any employee.

IMCD Group ensures that all its employees work under safe and stimulating working conditions. IMCD Group therefore commits to comply with all applicable local regulations regarding the workplace environment, working hours and general working conditions. It is IMCD Group's fundamental philosophy to respect and adhere to the principle of non-discrimination based on race, caste, national origin, religion, disability, age, gender, sexual orientation, union membership or political affiliation

IMCD UK Ltd has been a B member of SEDEX since 2010 and openly shares information with customers.

New staff members are introduced to the Group Code of Conduct and the principles within, during the induction process.

## Future actions

IMCD UK, as part of IMCD Group, will continue to monitor and review all suppliers in line with the requirements of the Act.

**This statement was approved by Board of Directors on 25<sup>th</sup> September 2017**

**Name**            **Richard Mell, Finance Director**

**Signature**

A handwritten signature in black ink, appearing to read "Richard Mell".

**Date**            **28.09.2017**

