



## **Anti-slavery, Human Rights and Trafficking Policy**

### **Our Business Model**

EFC is a UK based chemical manufacturer specialising in the manufacture of chemicals used in a variety of industries including flavour and fragrance, tobacco and automotive. Our supplier and customer base is global with a relatively small number of our suppliers in the UK.

In compliance with the Modern Slavery Act 2015, EFC offers the following statement regarding its efforts to prevent slavery and human rights and trafficking in its supply chain.

### **Aims of this policy**

This policy supports our commitment to limiting the risk of modern slavery occurring within our own business or infiltrating our supply chains or any other business relationship.

The policy applies to all persons working for or on our behalf in any capacity, including employees, directors, officers, agency workers, contractors, consultants, volunteers, interns and any other third-party representative.

At the forefront of our policy are our employees whom, in return for their loyalty and avoidance of conflict of interest, deserve the highest standard of protection of their human rights.

We expect all who have or seek to have a business relationship with the company to familiarise themselves with this policy and to act at all times in a way that is consistent with its values.

We will only do business with organisations who fully comply with this policy or those who are taking verifiable steps towards compliance.

### **How we seek to embed our policy in practice**

To underpin our policy commitments, we will further implement the following measures over the course of the financial year 2022-2023:

- We will conduct risk assessments to determine which parts of our own business and which of our supply chains are most at risk from modern slavery so we can focus our efforts on those areas most 'at risk'.
- Where appropriate, we will engage directly with suppliers in respect of our anti-slavery policy in order to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses and supply chains.



## **Supply Chain Management**

EFC is committed to social and environmental responsibility and has zero tolerance for slavery and human trafficking.

We provide our employees with more than the minimum legal requirements in terms of salary and benefits and operate our site to ISO:9001, ISO:14001 and ISO:45001 standards.

We are members of SEDEX (Supplier Ethical Data Exchange) and are regularly audited by our customers.

However, we recognise that modern slavery is a complex supply chain issue, and as a result, we internally review our supply chain to evaluate human trafficking risks and slavery risks. We will conduct supplier and customer visits where possible, to review business processes.

As a result of our relatively small size and our large global reach we accept there are some areas in our supply chain where we are at risk. However, this risk is on a very small percentage of our business.

### **Our internal review of our supply chain has identified the following points**

- 91.3% of our supplies in the 12 months to June 2022 were from Western Europe
- 1.9% of supplies are from Thailand, using only one company Thai Fatty Alcohols Ltd
- India supplies 4.6%, consisting of 5 suppliers.
- The largest risk on the supply side of our business relates to our supplier's downstream suppliers, some of whom are involved in small-scale agriculture in Thailand, Indonesia and the Philippines.
- 75% of sales are to western Europe and the USA
- The largest risk on the sales side of the business is for products sold through distributors in high-risk countries.

### **Responsibility for this policy**

The board of directors has overall responsibility for this policy and in ensuring that the company complies with all its legal and ethical obligations.

The Procurement and Sustainability Manager will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

All line managers are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day-to-day performance of their roles.

### **Breaches of this policy**

Any breaches of this policy will be taken seriously and dealt with on a case-by-case basis.



The breach of this policy by an employee, director or officer of the company may lead to disciplinary action in accordance with our disciplinary procedure. Serious breaches may be regarded as gross misconduct and may lead to immediate dismissal further to our disciplinary procedure.

Everybody to whom this policy applies will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.

### **Status of this policy**

The Company's board of directors will review this policy every three years.

This policy does not give contractual rights to company employees and we reserve the right to alter any of its terms at any time. We will notify applicable parties in writing of any changes, which may affect them.

A handwritten signature in black ink, consisting of a series of loops and curves, positioned above the text of the Board of Directors.

Board of Directors  
Eternis Fine Chemicals  
June 2022