



UK Modern Slavery Act

STATEMENT FOR THE FINANCIAL YEAR 2020

Introduction

This statement is made on behalf of The Holchem Group Limited pursuant to the section 54(1) of the Modern Slavery Act 2015 and comprises our slavery and human trafficking statement.

The statement outlines the steps we have taken to identify and prevent slavery and human trafficking in our own operations and supply chains. We understand our responsibilities and are committed to improve our practices to fight against slavery and human trafficking.

About Holchem's organisation, structure, business and supply chains

The Holchem Group's main operating company is Holchem Laboratories, formed in 1982, and its office and manufacturing facility is located in Bury, Lancashire. Holchem Group also includes Merlin Chemicals and Imperial Janitorial Supplies in Liphook, Hampshire. Consistently reviewing and developing new products, technical solutions and systems that can reduce cost and increase efficiency for its customers, Holchem has grown to become a leading supplier of hygiene solutions across the UK and Ireland in the farm, food processing, brewery & beverage, dairy and foodservice & facilities sectors, "from Farm to Fork". Now approaching its fifth decade, Holchem continues to deliver hygiene solutions through technology and an unparalleled commitment to service levels and since May 2020 has been a member of the Kersia group of companies.

Covering every individual process step of supply, from innovation to marketing, including production, our supply chain ensures high quality raw materials, labels and packaging. We include within our supply chain hardware and software for information technology, consumables, and other services from suppliers based all over the globe. Wherever possible, Holchem sources locally the raw materials it uses in its formulations, with many of them such as caustic soda, sodium hypochlorite and quaternary ammonium compounds sourced within the North West of England where its production facility is based.

For further information about us please visit our website <https://www.holchem.co.uk/>.

Holchem's rules and policies on slavery and human trafficking

Our policies, supported by the board of directors and senior management, in relation to slavery and human trafficking include:

- Anti-corruption & bribery policy
- Anti-harassment & bullying policy
- Equal Opportunities policy
- Ethical Trading policy
- Slavery & Human Trafficking policy
- Whistle Blowing policy

In addition, as a member of the Kersia group of companies the Kersia Code of Ethics applies to all Holchem employees and managers, regardless of their employment status – permanent or casual (company representative, employee, temporary staff, trainee, etc.). It also covers its activities with third parties (subcontractors, suppliers, external service providers, public authorities, professional associations, etc.). Consequently every employee supports the same basic principles in relation to human rights, equality, diversity, non-discrimination, non-harassment, health and safety, environmental protection and integrity.

Holchem and the rest of the Kersia group has zero tolerance to slavery and human trafficking. The group does not employ children within its operations. The welfare of our workforce is crucial for our continued success and we will not tolerate forced labour (including human trafficking) or child labour in our operations within any part of our group or supply chains.

As set out in the Kersia Code of Ethics, Holchem expects all its business partners to comply with these principles, including, for example:

- The principles of the United Nations Universal Declarations of Human Rights
- The core labour standards of the International Labour organisation (ILO)
- And the UK Modern Slavery Act 2015

Due diligence processes in relation to slavery and human trafficking in its business and supply chains

As Holchem expects its business partners to agree to the aforesaid rules and policies, we encourage them to assess their own supply chains to eliminate slavery and child labour. For the parts of the supply chain where there is a risk of slavery and human trafficking taking place, Holchem has challenged its key suppliers. One particular example, in the past months, and in the highlighting of recent elements in the Xinjiang area in China, and more particularly the forced labour that the Uyghur populations are undergoing because of their cultural and religious belongings, we have asked suppliers to indicate if they are directly or indirectly sourcing products, components, raw materials or packaging from this region. At this stage answers have been received from nearly all suppliers asked and no suppliers have indicated sourcing products components, raw materials, or packaging from the Xinjiang area in China.

Sedex is a membership organisation that provides one of the world's leading online platforms for companies to manage and improve working conditions in global supply chains. It provides practical

tools, services and a community network to help companies improve their responsible and sustainable business practices, and source responsibly. Holchem Laboratories is a member of Sedex and as such has carried out its own Self-Assessment in line with Sedex requirements. A significant proportion of Holchem's key supplies are from suppliers who are members of Sedex.

As part of our initiative to identify, monitor and mitigate against industry risk, business transaction risk and risk in the countries in which we operate Kersia group has currently implemented a specific tool (a software called RiskRate, edited by Navex Global UK Ltd) for automatically checking the compliance of its partners with whom all the Kersia group subsidiaries work as soon as an order / invoice is issued / received (Holchem being included in the process), in order to protect, advise and anticipate the occurrence of a risk that could have harmful consequences. It is notably checked if our partners are suspected or have been convicted of certain crimes or offences including slavery, compulsory labour and human trafficking, and more generally of human rights.

Where slavery or human rights issues are identified in our global supply chains, as well as any non-compliance behaviour with our Code of Ethics, we will work with our partners to address any concerns as quickly as possible. Holchem reserves the right to discontinue supply or delivery from or to any company which fails to meet our rules and policies.

Holchem maintains a legal register to ensure compliance with relevant workplace legislation including the Human Slavery Act 2015. Training about slavery and human trafficking is given to staff during induction training and is available via the group's Staff Handbook.

In order to assess its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chain Holchem has a schedule of planned internal audits.

Reporting

Reports of suspected non-compliance in connection with activities of Holchem and its partners, including activities that harbour a risk of slavery, compulsory labour or human trafficking, can be forwarded to the relevant line manager, to Holchem Directors and Managing Director, to the Kersia group legal and compliance department, or to members of Kersia's CSR Committee.

This can be done in person, electronically, in writing or by phone or by the internal whistleblowing system to which every Kersia employee (including Holchem employees) has access to.

This can be done either anonymously, or the person(s) reporting the violation can also identify themselves.

If it is found that a violation has indeed occurred, appropriate steps are taken to remedy the identified failings in compliance with the relevant internal procedure.

We have not received any reports of concerns in relation to slavery or human trafficking within our group or supply chain in the last financial year.

This statement has been approved by the board of directors and is signed on behalf of Holchem by Stuart Middleton, Managing Director, April 2021.