

Purpose of this statement

This statement outlines the steps we take to address the risk of slavery or human trafficking in our own organisation or anywhere in our supply chain.

This statement also sets out the actions that we take to understand all potential modern slavery risks related to its business and the steps we have in place to ensure that no slavery or human trafficking exists at Univate or within our supply chain.

Our Supply Chain

We source a range of goods and services from third parties and we operate an approved supplier list.

Our supply chain for goods and services is not complex, with most of the procurement being sourced within the EU.

Our Policies

We are committed to conducting ourselves honestly and with integrity; striving for fairness in everything we do, including how we treat our employees.

We ensure that all our staff are aware that they can confidentially report any concerns, including cases of unethical behaviour, and we review every case that is reported and take appropriate action.

We have policies in place that ensure our employment practices mitigate the risks identified in the Modern Slavery Act, including:

- Workers are not subject to any forced labour and have the freedom to terminate their employment at any time, without penalty, given the length of notice specified;
- Workers will not be charged any fees for recruitment;
- The confiscation or withholding of any worker identity documents is strictly prohibited;
- Our workplace is free of any form of harsh or inhumane treatment, as outlined in our Dignity at Work Policy and reinforced through staff training;
- All workers, irrespective of their nationality, are treated fairly and equally;
- All workers are paid at least the minimum wage required by law and wages are paid at regular intervals, directly to the member of staff;
- Workers are not required to work in excess of the legally mandated number of hours;
- Any and all overtime is voluntary, and no worker will be required to work overtime under the threat of penalty or dismissal.

Risk Assessments

We understand that our biggest exposure to Modern Slavery is in our supply chain. We assess and risk profile suppliers and that has helped us to focus our efforts where they are most needed. We conduct risk profiling utilising the services provided and as part of that we consider:

- The country services are provided from
- how much we spend with the supplier now and in the future
- the length of relationship we have with the third party
- the services the supplier is providing

A Modern Slavery risk assessment is conducted prior to signing a contract with a supplier and at least annually thereafter, or when we are made aware there has been a significant change to the supplier which may impact the risk to Modern Slavery. We review the assessments to ensure the oversight we have is commensurate to the risk each supplier poses.

Supplier Due Diligence

We take a risk-based approach to the due diligence it applies to its third parties and our Modern Slavery Policy sets out the due diligence required to manage identified Modern Slavery risk, this includes:

- Mapping the supply chain to assess geographical risk of modern slavery and human trafficking
- Assessing goods provided against modern slavery and human trafficking risk
- Evaluating the modern slavery and human trafficking risks of all new suppliers
- Conducting third party assessments where modern slavery has been identified as a risk
- Implementing action plans where deficiencies have been identified and working with the third party to ensure improvements are made
- Invoking sanctions against third parties that fail to improve their performance in line with action plans, including the potential termination of the relationship with the supplier

Performance Indicators

We understand that Modern Slavery risk is not static and we will therefore continue to re-assess our

approach. In order to assess the effectiveness of our approach we will review the following KPIs, paying close attention to:

- The proportion of internal policies that have been reviewed in line with the Modern Slavery Act
- The proportion of third parties who have been evaluated against our modern Slavery risk assessment tool
- The number of Modern Slavery breaches that have been reported to us or that have been discovered through our due diligence
- The proportion of controls executed as per our Modern Slavery policy
- The effective, and timely conclusion of any identified issues
- The proportion of relevant staff who have completed Modern Slavery training

Key Actions to Date

Since being established, we have:

- Improved Governance Policies
- appointed a responsible person overall responsibility for Modern Slavery
- launched a Modern Slavery Policy
- embedded Modern Slavery into our Third-Party Management programme
- reviewed our HR policies
- built a picture of the risks our key suppliers pose to provide us with an understanding of the Modern Slavery risks across our business
- included Modern Slavery risk assessments before we enter into a relationship with a new supplier
- Provided Awareness Training
- Improved Compliance
- updated relevant existing legal contracts with suppliers and ensure Modern Slavery provisions are included in all new contracts

Further Steps

We will continue to build on the progress we have made through keeping abreast of developments in the subject and learning from the oversight we conduct on our Third Parties.