



## Modern Slavery Act 2015 Policy Statement

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that BituChem has taken and is continuing to take 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. BituChem 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 taking place within the business or our supply chain.

### Our Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Anti-Slavery Policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
- Recruitment Procedure. We operate a robust recruitment process, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Whistleblowing Policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

### Our Suppliers

BituChem operates a Procurement Procedure and maintains an Approved Supplier List. We conduct due diligence on all suppliers before allowing them to become an approved supplier. We require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business
- They hold their own suppliers to account over modern slavery

### Training

We will regularly brief all relevant management and staff members, and ensure that our policies reach every employee, in order that they understand the signs of modern slavery and what to do if they suspect that there is any risk of it taking place within any area of our business or our supply chain.

### Our Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or enforcement agencies to indicate that modern slavery practices have been identified.
- We achieve a level of communication and personal contact with every employee and their understanding of, and compliance with, our expectations regarding modern slavery.

The Managing Director shall review this policy annually or following significant changes.

Signed

A handwritten signature in black ink, appearing to read "R Lord".

Roger Lord  
Managing Director  
Dated: 01<sup>st</sup> May 2019