

# Modern Slavery **Policy**

April 2023



Version 1.0

**TATA** CHEMICALS EUROPE



# Modern Slavery Statement

## **Slavery and Human Trafficking Statement of TCE Group Limited and its subsidiaries for the financial year ending 31<sup>st</sup> April 2024.**

The UK Modern Slavery Act 2015 requires certain businesses to publish a statement setting out the steps taken in the previous financial year to seek to ensure that modern slavery and human trafficking are not taking place in their own business or within their supply chains.

TCE Group Limited, as parent Company, is publishing this statement on behalf of itself and its operating subsidiaries Tata Chemicals Europe Limited, British Salt Limited and Winnington CHP Limited (the TCE Group).

### **ORGANISATION STRUCTURE**

TCE Group is a manufacturer in the chemicals sector, producing products including sodium carbonate, salt and sodium bicarbonate. We form part of the global Tata Chemicals Group and our ultimate company is Tata Chemicals Limited which is listed on the Mumbai Stock Exchange. TCE Group's operations are all situated within the UK, with its head office in Northwich, Cheshire. TCE Group employs around 400 people.

TCE Group prioritises its social and environmental responsibilities and is fully committed to playing its part in tackling modern slavery. We advocate transparency and collaboration to reduce the risks of modern slavery and we ensure that we take appropriate action where necessary.

TCE Group is committed to operating and promoting ethical and lawful business practices within the workplace. This is evidenced through our recruitment vetting procedures, our occupational health procedures (we are a 'mindful employer' and place a strong emphasis on supporting good mental health in the workplace) and our long standing Trade Union agreements. We have a number of training packages around Modern Slavery, Equality and Diversity as well as Bribery, all underpinned by our global Tata Code of Conduct, which is a broad ranging framework of ethical business rules by which every Tata company is bound. Adherence to the Tata Code of Conduct forms part of the employment contract of all of our employees.

It is recognised that tackling modern slavery is a long-term journey. This statement sets out the current status of the steps taken by TCE Group to prevent modern slavery and human trafficking in our own operations and supply chains.

### **OUR BUSINESS AND SUPPLY CHAINS**

TCE Group spends in the region of £200 million each year on goods, services and raw materials to support the manufacturing and distribution processes, most of which are procured from within the UK. The significant majority of our raw materials are supplied from within the UK, primarily from within 30 miles of our Cheshire manufacturing plants.

To meet business needs, the procurement function is responsible for managing and improving our procedures around supplier selection, qualification and on-going compliance and performance. The organisation undertakes due diligence when considering taking on new suppliers, and reviews its existing suppliers. Over the past 12 months:

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- TCE has continued to develop supplier pre-qualifications using SAP Ariba so that we can track and monitor supplier responses to modern slavery. All suppliers will be rejected if they cannot comply with our requirements to demonstrate their compliance to modern slavery.
- We have published our Responsible Procurement Policy on both our internal intranet and external websites, this is also included in the supplier pre-qualification via Ariba.
- Continued with a check and monitoring process, conducted by Head of Procurement that is for the following;
  - i) Completed and passed qualification in Ariba via a monthly report that tracks progress
  - ii) Managing a prioritisation plan to complete qualification of all high risk and preferred vendors and is in place until 100% completion
  - iii) Vendors approved have provided documentation supporting zero tolerance towards modern slavery
  - iv) Vendors have agreed to supplier code of conduct
- An audit of TCE high-risk vendors was undertaken by the Head of Procurement.
  - i) Those high risk vendors were sent a questionnaire for completion.
  - ii) This information was then populated to determine if the vendor was required to submit an updated annual modern slavery statement (Section 54 of the Modern Slavery Act requires a commercial organisation with a turnover in excess of £36m to update their statement annually).
  - iii) The vendor was also requested to advise if there any been any recorded or uncovered incidents in their organisation.
  - iv) 58 vendors were audited and with no recorded incidents. All relevant vendors were able to provide their updated annual modern slavery statement.
  - v) TCE Group would have no hesitation in terminating the business relationship if a supplier was found to have contravened their commitment to the Modern Slavery Act or engaged in practices incompatible with the Act.

### RESPONSIBILITIES AND POLICIES

Responsibility for the organisation's Corporate Social Responsibility initiatives, which includes compliance with the Modern Slavery Act, sits with the TCE Group Board.

Our approach to addressing modern slavery is supported by a number of organisational policies and we take any breach of our policies or allegations extremely seriously. In the last 12 months there have been no reported incidents in relation to modern slavery or human trafficking.

*Modern Slavery Policy Statement* – sets out our commitment to preventing modern slavery or human trafficking in the delivery of our service and full support in the promotion of ethical and lawful business practices within the workplace.

*Whistleblowing Policy* - encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains, of the organisation. This



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includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. We also have a whistleblowing helpline called 'Integrity Matters' to ensure the highest levels of quality and confidentiality.

*Tata Code of Conduct* - makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour.

*Our Engagement Processes, Procurement and Supply Chain Frameworks* - set out our commitment to ensuring that our supply chain adheres to the highest standards of ethics.

Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat their workers with dignity and respect, and act ethically and within the law at all times.

*HR vetting* - we utilise the services of a master vendor recruitment agency in relation to employing people on either a permanent or temporary basis and verify the practices of the agency. All employees, contractors and agency workers have their right to work in the UK verified. As an organisation we ensure that we adhere to legislation in relation to minimum age requirements, wages and the 'Working Time Directive'. We also vet our employees and conduct background checks. We have improved this vetting process to include criminal background checks and financial checks for key areas of the business.

### TRAINING

TCE Group requires all employees working within the organisation to complete training on our organisational policies. We believe that awareness is one of our most effective methods to reduce the risk of modern slavery.

Refresher training was conducted for all key members of the team in 2022 .

New employees complete our mandatory e-learning induction programme; this includes a safeguarding module which highlights the importance of recognising modern slavery.

We also identified the need for a modern slavery workshop for key risk areas such as HR and Procurement which aims to enable employees to:

- Define modern slavery
- Recognise the types of individuals who might be at risk of becoming a victim of modern slavery
- Identify the warning signs of someone who is a victim of modern slavery
- Know where to signpost individuals to for help and support

We will be conducting an awareness campaign starting in 2023 as part of our ongoing commitment to strengthen employee awareness of the risks around slavery and human trafficking.

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Using articles on our internal communications channels, which includes noticeboards and Yammer (Facebook for work) we will highlight the signs of Modern Slavery and where to report any concerns.

### KPI's

- Ensure that 100% of all employees are exposed to modern slavery awareness
- Ensure 100% of inductions of our permanent staff inductions include modern slavery awareness information
- Ensure 100% of all employees in Procurement and HR Management undertake relevant in depth training modules every two years

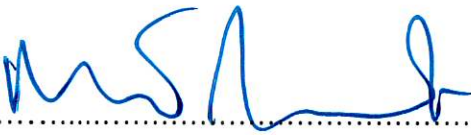
### THE FUTURE

Over the course of the next financial year we will continue to raise awareness and understanding of the risk of modern-day slavery within our business and enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers.

All new recruits will no longer be able to pass their probationary period unless the Modern Slavery e-learning is completed.

Our supplier portal is now operational. This portal allows our suppliers to access our policies and procedures and their obligations to work with us and for us.

This statement has been formally approved by the TCE Group Board and signed on their behalf.



**Dr Martin Ashcroft, Director**  
**TCE Group Limited**

Date: 11.4.23

