

NCH (UK) LIMITED – MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

At NCH (UK) Limited (the **Company**) we are committed to protecting and respecting human rights and have a zero tolerance approach to slavery and human trafficking in all its forms. This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015. We have implemented the NCH Anti-Slavery Policy (the **Policy**) to ensure that we strictly prohibit the use of modern slavery and human trafficking in our operations and our supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. This statement will be reviewed annually.

Organisation's structure

We are a chemical manufacturer and water treatment provider. We are a part of the NCH Group (**Group**), and our ultimate parent company is NCH Corporation which has its head office in the United States. The Group has over 8,500 employees worldwide and operate in 50 countries.

The Group has a global annual turnover of £665 million.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

As part of our initiative to identify and mitigate risk we have procedures to:

- Review our Policy on an annual basis; and
- Identify changes that could improve our Policy.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk, we are implementing systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

We have allocated responsibility internally to one of our departments to ensure that our due diligence processes are as robust as they can be and to identify any changes that could be made to improve our processes over time.

Suppliers, contractors and other business partners' adherence to our values and ethics

We have zero tolerance to slavery and human trafficking. Our suppliers, contractors and other business partners are required to hold their own suppliers to the same high standards.

We consider that the greatest risk of modern slavery in our supply chains is when we deal with companies based in jurisdictions which do not have equivalent standards and legislation to the UK.

As part of our on-going risk assessment and due diligence processes, we consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Policy. We also assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk-based approach, we will also assess the merits of writing to suppliers requiring them to comply with our Policy, which sets out the minimum standards required to combat modern slavery and trafficking.

If we find that other individuals or organisations working on our behalf have breached our Policy we will ensure that we will take appropriate action. This may range from considering the possibility of breaches being remedied and whether that might represent the best outcome for those individuals impacted by the breach, to terminating such relationships.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide ongoing training to our staff.

We are investing in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees are encouraged to identify and report any potential breaches of our Policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking from our business and our supply chains.

Further steps

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Carrying out a review of our modern slavery compliance.
- Reviewing our Policy.
- Providing training to new employees.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 30 April 2022.

It was approved by the board on 7 March 2023.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 30 April 2021. It was approved by the board on 28 October 2021.

Martyn Ruscoe

Director



NCH Date: - Martyn Ruscoe (Oct 29, 2021, 6:32pm)

