SEQENS
CUSTOM SPECIALTIES

MODERN SLAVERY STATEMENT
FINANCIAL YEAR 2024

Introduction
Chemoxy International Limited will not tolerate forced, bonded or compulsory labour, human trafficking and other kinds of slavery or servitude within its own Organisation or within its Supply Chain.

The Organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking. It is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its Supply Chains are free from slavery and human trafficking.

This statement relates to actions and activities during the financial year 1st January to 31st December 2024.

Organisational Structure and Supply Chain
Chemoxy International Limited is one of Europe's largest contract manufacturers, combining the speed and agility of a small/medium sized company with the health and safety and environmental performance of the best major chemical corporations.

The business has a large proportion of exports sales and employs over 180 highly skilled workers across two sites at Middlesbrough and Billingham, in Teesside. The Company has a long-established reputation for technical excellence, confidentiality and EH&S compliance

In addition to Custom Processing, the Company manufactures a range of environmentally-friendly solvents which are used in the latest generation of paints and cleaning products.

We serve a diverse range of industries, including: specialty chemicals, petrochemicals, oil and gas, fuel and lube additives, household and personal care, flavour and fragrance, agricultural chemicals and surface coatings.

Countries of Operation and Supply

Operations: Chemoxy International Limited operates in the United Kingdom:

Supply side: As a guide the Company does business with Suppliers in the following countries

Austria	Finland	Israel	Philippines	South Korea
Argentina	France	Italy	Poland	Spain
Belgium	Germany	Japan	Qatar	Switzerland
Brazil	Hungary	Malaysia	Saudi Arabia	Thailand
Canada	India	Netherlands	Slovakia	Trinidad & Tobago
China	South Africa	United Kingdom	USA	

SEQENS
CUSTOM SPECIALTIES

Our Supply Chain
Our Supply Chain includes Suppliers of raw materials from across the globe, Suppliers of engineering parts and services from the UK and Europe, Suppliers of professional services from the UK, Europe and the rest of the world. We are reviewing the risks that these Supply Chains can present.

We expect our Suppliers and Contractors to demonstrate a zero-tolerance approach to exploitation. To this end we have inserted a clause into our contracts requiring their compliance with the provisions of the Act and granting Chemoxy the right to terminate in the event of their failure to do so.

Responsibility for the Organisation's anti-slavery initiatives is as follows:

Policy:
The Board of Directors of Chemoxy International Limited is responsible for ensuring this policy is implemented. The Purchasing Manager, Category Purchasing Manager and the HR Manager are responsible for monitoring the compliance of this policy.

Investigations/Due Diligence:
The Purchasing Manager and Category Purchasing Manager is responsible for ensuring Suppliers comply with this policy and for investigating any suspected instances of slavery or human trafficking. The HR Manager is responsible for ensuring employment practices in Chemoxy International Limited comply with this policy and for investigating any suspected instances of slavery or human trafficking.

Training:
All departments have been trained in their responsibilities under this policy.

Relevant Policies:
The Organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

Whistleblowing Policy:
The Organisation encourages all its workers, customers and other business partners to report concerns related to the direct activities, or the Supply Chains of, the Organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Organisation's whistleblowing procedure is designed to make it easy to make disclosures, without fear of retaliation.

Dignity at Work Policy:
The Organisation's Dignity at Work policy makes clear to employees the actions and behaviours expected of them when representing the Organisation. The Organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

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CUSTOM SPECIALTIES

Supplier/Procurement:
The Organisation is committed to ensuring that its Suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The Organisation works with Suppliers to ensure that they meet the standards and improve their worker's working conditions as appropriate. However, serious violations of this policy will lead to the termination of the business relationship.

Agency Workers Policy:
The Organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due Diligence
The Organisation undertakes due diligence when considering taking on new Suppliers, and regularly reviews its existing Suppliers. The Organisation's due diligence and reviews include:-

- mapping the Supply Chain broadly to assess particular product or geographical risks of modern slavery and human trafficking
- evaluating the modern slavery and human trafficking risks of each new Supplier

Over the next few years the Company will;
- Conduct supplier audits or assessments where we have assessed the need for a greater degree of focus on slavery and human trafficking
- Take steps to improve substandard Suppliers' practices, including providing advice to Suppliers through our Purchasing and Quality department
- Participate in industry appropriate collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular
- Assess whether ethical supplier databases could be used to strengthen the Company's compliance
- Invoke sanctions against Suppliers that fail to improve their performance or seriously violate our policy, including the termination of the business relationship

Performance Indicators
The Company has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result:-
- All Department Managers and HR and Purchasing Professionals have completed training on modern slavery.
- The organisation evaluates potential Suppliers before they enter the Supply Chain.

Training
All Staff working in Purchasing, Commercial and HR within the Organisation have been trained on the Modern Slavery Policy. Modern Slavery training covers:

- The Company's purchasing practices, which influence supply chain conditions and should therefore be designed to prevent purchases at unrealistically low prices, the use of labour

engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline
- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available
- How to identify the signs of slavery and human trafficking
- The initial steps that should be taken if slavery or human trafficking is suspected;
- How to escalate potential slavery or human trafficking issues to the relevant parties within the Organisation
- What external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative
- The steps the Organisation should take if Suppliers or Contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the Organisation's supply chains.

Awareness-raising programme
As well as training staff, the Company will be raising awareness of modern slavery issues by displaying posters across Chemoxy's two sites, circulating emails to staff and including information in Company communication sessions.

The communications explain:
- the basic principles of the Modern Slavery Act 2015;
- How Chemoxy can identify and prevent slavery and human trafficking
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the Organisation; and
- What external help is available, for example through the Modern Slavery Helpline

Board Approval

This statement has been approved by the Chemoxy Board of Directors and will be reviewed and updated annually.

Director's signature: H.M. Webster

HELEN WEBSTER.

Director's name:

Print Name (Print job title)

CEO.

Date:

19/5/25.