

Modern Slavery Statement (2025)

Introduction

This statement constitutes Esterchem Limited's modern slavery and human trafficking disclosure for the financial year ending 2025 and covers Esterchem Limited only. It supports Esterchem Limited's zero tolerance approach to modern slavery, child labour, forced labour practices, human rights violations and human trafficking.

Human trafficking, modern slavery, child labour and forced labour are practices generally used as a way of maximising profits, by producing goods or providing services at lower costs, through the exploitation of individuals.

Esterchem Limited ('the company', 'we', 'us', 'our') is committed to using all reasonable endeavours to implement and enforce effective systems and controls to ensure modern slavery, child labour, forced labour practices, human rights violations and human trafficking is not taking place within our own company, or within our wider supply chain.

Organisational Structure

Founded in 1998, Esterchem Limited is an independent family-owned chemical manufacturing company with operations within the United Kingdom employing approximately seventy people across two sites in Leek, Staffordshire.

Our business is centred around the manufacturing of a wide range of esters and the flexibility we have enables us to offer tailored solutions to each of our customers including bespoke product development.

The company's customer base is diverse with customers from many different industries located worldwide.

Supply Chains

We procure goods and services from wide range of suppliers with these being primarily located within Europe and the UK. We maintain a close and long-term working relationship with several key suppliers, who provide our raw materials and services such as IT support, distribution and equipment maintenance.

The company will only work with reputable and registered suppliers who are assessed as suitable prior to them supplying us with any goods or services. Further details on our policies and due diligence assessments can be found in the respective sections of this statement.

It is generally possible to map our supply chains down to tier 2 as a minimum, however, going further than this point poses significant challenges due to the complexity of chemical supply chains. There are ongoing discussions with a number of tier 1 suppliers in relation to a proportion of supplied raw materials to map the supply chain back to the original source.

Organisational Policies

We have several robust policies in place that are monitored and updated regularly to ensure they remain effective and appropriate with the aim to ensure that we are conducting business transparently and ethically. As a company with a strong sense of integrity we are committed to respecting human rights in our own operations and within our supply chains.

- Our [Modern Slavery and Trafficking Policy](#) supports our zero-tolerance approach to modern slavery, whether as slavery, servitude, forced or compulsory labour, human trafficking and other human rights violations.
- Our [Human Rights and Ethical Conduct Policy](#) supports our zero-tolerance approach to the abuse of human rights within any part of our business or supply chains.
- All suppliers must read and sign their agreement to comply with our **Supplier Code of Conduct**. This document sets forth what is required and expected of our suppliers and contractors in relation to the following and details the potential consequences of non-compliance:
 - Compliance with the law
 - Modern slavery and human trafficking
 - Human rights
 - Health and safety
 - Equality, diversity and inclusion
 - Harassment
 - Freedom of association
 - Whistleblowing
 - Fraud, bribery and corruption
 - Data protection
 - Conflict of interest
 - Anti-competition
 - Tax evasion
 - Conflict minerals
 - Emissions
 - Environmental impact
 - Environmental responsibility
 - Pollution
 - Reporting of breaches
- Our **Sustainable Procurement Policy** details the steps we take to ensure transparency, integrity and inclusivity within our supply chain and ensure that we use suppliers who understand their duty to protect the environment and respect the rule of law and human rights in the countries in which they operate.

We also maintain several other policies such as the below which support various other business commitments:

- Anti-Fraud and Anti-Bribery and Corruption Policy
- Environmental Policy
- Equality, Diversity, and Inclusion Policy
- Fair Competition Policy
- Greenhouse Gas (GHG) Emissions Policy
- Health and Safety Policy
- Information Security Policy
- Learning and Development Policy
- Whistleblowing Policy

Risk Management (Risk Assessment, Risk Governance, Risk Identification and Due Diligence)

Risk management is primarily the responsibility of the Compliance and Sustainability Manager, with lines of communication to other internal stakeholders such as Procurement representatives and the QHSE Manager. Where any escalation may be deemed necessary the Directors would be consulted to consider an appropriate response and plan of action.

During the financial year ending 2025 we further strengthened our due diligence process that is proportionate to our size, structure, area of business and nature of our supply chain. This included revising our Supplier Sustainability Risk Assessments aimed at further improving third party due diligence and risk assessment. The revised Supplier Sustainability Risk Assessments will be completed in the current financial year, and form part of a process that is revised and updated annually going forwards.

We use several tools to identify and assess modern slavery risks within our supply chain, these include desk-based research, reference to key sources such as the Global Slavery Index, engagement with NGOs such as Transparency International, supplier questionnaires, and other audits or assessments made available.

Our assessment process considers the geographical location of a supplier and the impacts this can have on the potential risk in relation to various issues such as human rights, the environment and corruption. This is important as legal protection and regulatory instruments against breaches of human rights or environmental issues can be more limited in some countries. In addition to the geographical location, our risk assessment process looks at the specific company's policies and processes, any past and ongoing legal proceedings or regulatory breaches, and looks at people such as the company's owners and key personnel.

Once the due diligence and risk assessment process has been completed, we are able to confirm whether the business relationship with a supplier can be initiated or continued without further action other than acknowledgement of the Supplier Code of Conduct in writing, or whether a more in-depth assessment needs to be undertaken as set out in our Sustainable Procurement Policy.

Where we believe or have reason to believe any of the below, we can trigger additional appropriate due diligence activities, and we reserve the right to terminate a business relationship with a supplier at any time.

- Refusal to supply the information requested
- That the information provided by a supplier or a third party does not accurately reflect the sustainability risk
- The sustainability risk may have altered substantially since the initial assessment
- A supplier may be in violation of applicable laws or regulations.

As part of our efforts our Supplier Information Questionnaire includes additional questions related to our mitigation efforts of human rights and modern slavery issues.

Training

We recognise the importance of training as a key avenue for raising awareness and understanding of a particular issue.

Key staff who are involved with procurement have been identified and trained on the risks to ensure that they understand the potential impacts they can have. Training is carried out via our online sustainability management system. This training was expanded during the previous financial year and will be reassessed during the current financial year to identify any improvement opportunities.

Our Whistleblowing Policy provides protection for those who whistle-blow in relation to any potential issue they feel is relevant.

Effectiveness and Progress

There continued to be no reported breaches of the Modern Slavery Act reported during the financial year ending 30th June 2025.

All our policies and procedures are regularly reviewed (at least annually) to ensure appropriateness and effectiveness.

The policies and procedures relevant to this statement were reviewed and revised in 2025 to expand our efforts in relation to the risks involved with modern slavery and human trafficking in our supply chain and in our company.

We have completed our further updated risk assessment and due diligence assessment for all raw materials suppliers in 2025.

Although the current measures are deemed to be effective, there is the potential for training of key personnel to enable them to complete onsite audits of certain key suppliers in the future.

Declaration and Approval

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015. This statement constitutes Esterchem Limited's modern slavery and human trafficking disclosure for the financial year ending 30th June 2025.

All members of Esterchem Limited's Board of Directors are aware of the preparation of this statement, and it has been formally reviewed and approved by the Board of Directors, it will be reviewed, updated and published annually.

Signed By: Adam Bray
Position: Managing Director

Signature: 

Approved Date: 06/11/2025