Orthene.

Orthene Slavery and Human Trafficking Report 2026

1. Introduction

This Group report & statement is prepared in pursuant to section 54 of the Modern Slavey Act 2015. Orthene Chemicals Limited (Orthene) manufactures high-performance brake fluids at its site in Harrow, United Kingdom. Its suppliers and customers are located in the UK and internationally. Orthene employed more than 70 people during the reporting period, most of whom were recruited from the local area.

Turnover. The reported turnover for the period 1st April 2025 to 31st March 2026 is £40.66 million.

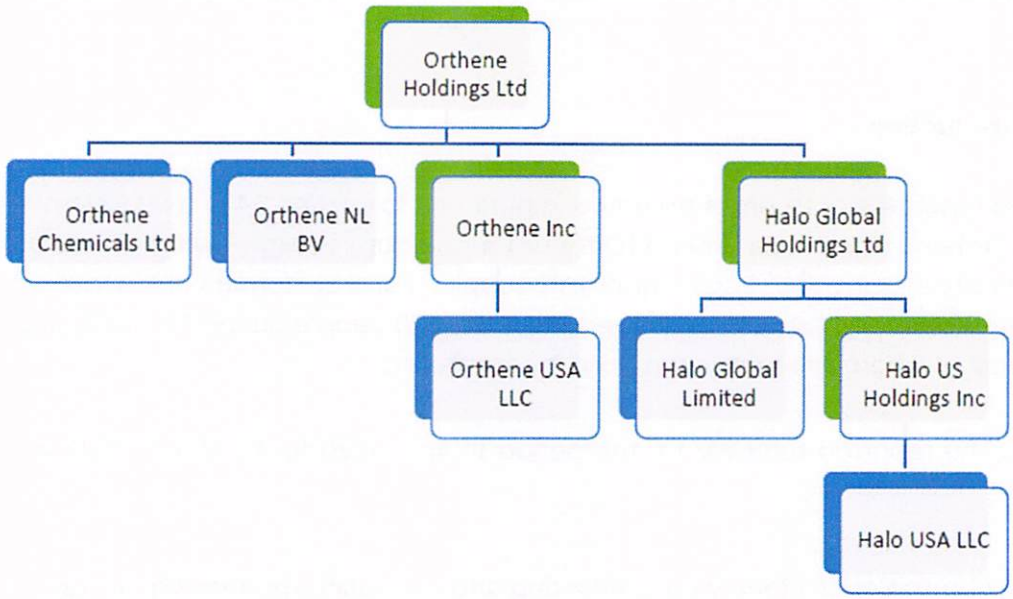
Orthene is committed to identifying, preventing and mitigating modern slavery and human trafficking risks in its operations and supply chains. This group report constitutes the statement required by section 54 and describes the steps taken during the reporting period; it does not claim that every tier of the supply chain is risk-free.

2. Organisation structure and supply chains.

This is a group report covering the family-owned Orthene Holdings Limited group and the activities undertaken by the following entities during the reporting period:

The covered entities are Orthene Holdings Limited, Orthene Chemicals Limited, Orthene NL BV, Orthene Inc, Orthene USA LLC, Halo Global Holdings Limited, Halo Global Limited, Halo US Holdings Inc and Halo USA LLC.

The report addresses the operations and supply-chain measures of these covered entities. Where a covered entity is independently within the scope of section 54, this group report is intended to satisfy its reporting obligation.



Orthene purchases raw materials and packaging from more than 30 direct suppliers. Most raw ingredients are sourced from European suppliers; other suppliers are located in North and South America, Taiwan, South Korea and China. Orthene currently has greater visibility of direct suppliers than of lower-tier suppliers. Its supply-chain work therefore focuses on improving visibility beyond tier 1 and prioritising suppliers by country, product and labour-risk indicators.

3. Policies and Standards

Orthene's Working Conditions Policy supports its commitment to:

- provide fair and lawful remuneration and comply with applicable working-time requirements;
- provide a safe workplace and protect workers from unlawful discrimination, harassment, violence and intimidation;
- recruit workers fairly and prohibit forced, compulsory or trafficked labour;
- respect freedom of association and collective bargaining;
- prohibit worker-paid recruitment fees and the confiscation of workers' identity documents;
- prohibit child labour. Lawful employment, work experience or apprenticeships for young people must comply with applicable age, education, working-time and health-and-safety requirements, and no person under 18 may undertake hazardous work; and
- operate as a responsible member of the local community.

Orthene's Code of Conduct, Equality, Diversity and Inclusion Policy and whistleblowing arrangements complement these standards. Policies are communicated through onboarding and periodic training. Concerns may be raised confidentially through the whistleblowing hotline, without retaliation.

4. Risk assessment and management

Orthene has identified two principal categories of modern slavery risk:

- risk within its own operations, including recruitment, agency labour and the possibility that vulnerable workers may be subject to coercion, recruitment debt, document retention or other forms of exploitation; and
- risk in the upstream supply chain, including the production of raw materials and packaging in countries or sectors where labour protections, recruitment practices or supply-chain transparency may be weaker.

Orthene considers geographic location, product or service category, use of temporary or migrant labour, recruitment channels, supplier responses and visibility beyond tier 1 when prioritising risks. A lack of information is treated as a reason for further enquiry rather than evidence that no risk exists.

5. Due Diligence Processes

Own operations

Recruitment and onboarding include identity and right-to-work checks, written employment terms and monitoring of the relevant records. Orthene is an accredited Real Living Wage employer. These controls support lawful employment but are not treated as a substitute for modern-slavery risk assessment.

Employees may report suspected wrongdoing through Orthene's whistleblowing hotline. Reports are to be handled confidentially, investigated promptly and escalated where appropriate. Where indicators of modern slavery are identified, Orthene will take a victim-centred approach, prioritise immediate safety, preserve confidentiality and seek specialist or law-enforcement support where appropriate.

Supply chains

In Q1 2024, Orthene reviewed its major suppliers and asked them to confirm their approach to forced labour and supply-chain due diligence. The results reported by respondents were:

- A total of nineteen suppliers were contacted, with all nineteen responding to the survey.
- 100% stated that their company did not use forced labour;
- 83% stated that their supply chains were free from forced labour;
- 67% stated that they investigated or audited their supply chains for evidence of forced labour; and
- 67% stated that they had an anti-slavery statement or policy.

New suppliers are asked about their anti-slavery policies during setup. Where information is missing or indicates elevated risk, Orthene may request supporting evidence, require corrective action, monitor progress or reconsider the relationship. Disengagement will be considered carefully so that action does not inadvertently increase harm to affected workers.

As per Orthene policy, new suppliers will be queried as to their anti-slavery policies as part of their initial setup.

6. Training

All new starters receive Code of Conduct training incorporating modern slavery awareness. Refresher Code of Conduct training is provided to employees every two years. Training is intended to help employees recognise indicators of exploitation, understand reporting routes and respond appropriately. Procurement, HR and managers with relevant responsibilities should receive role-specific training.

7. Monitoring effectiveness and next steps

Orthene will monitor and report progress using the following measures:
the number and proportion of suppliers and procurement spend covered by modern-slavery screening;

- the number of higher-risk suppliers receiving enhanced review and the closure of corrective actions;
- completion of modern-slavery training, including role-specific training for procurement, HR and relevant managers;
- the number and nature of concerns raised, investigations completed and remedies provided, subject to confidentiality; and
- progress in mapping material and labour supply chains beyond direct suppliers.

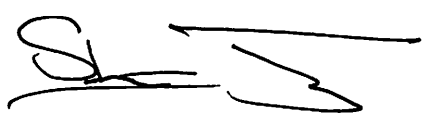
Targets for the next reporting period:

- Review the training program and, where gaps are identified, ensure 100% training compliance with all relevant staff.
- Review existing supplier evaluation procedures to account for slavery risk, obtain approval from management and implement them into the system.
- Use the new supplier evaluation procedures to create a list of high/low risk suppliers with regards to slavery.

8. Approval and publication

Orthene maintains a dedicated modern slavery section on its website. This group report will be published there and linked prominently from the website homepage. It should also be published or linked on the relevant UK website of each covered entity that is independently required to report. Previous reports should remain available to support year-on-year comparison.

This group report and statement was approved by the Board of Directors of Orthene Holdings Limited on behalf of the covered group entities on **01/10/2026**

Signed: 

Name: Steve Jay
Position: Technical Director
Date: 01/10/2026