

# Anti-slavery and human trafficking statement

Tetrosyl Limited

## 1: Opening statement from senior management

Tetrosyl Limited is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain, and imposes the same high standards on its suppliers. Modern slavery is a heinous crime and affects individuals and communities on a worldwide basis. Tetrosyl will not tolerate any such activities either within its own business or within its supply chain.

## 2: Structure of the organisation

Tetrosyl Limited is the largest manufacturer of car care products in Europe and the largest independent oil blender in the UK. It represents the core business of Tetrosyl Group Limited (its parent Company) and employs circa 600 people across the company.

The Group has a global annual turnover in excess of £150m. To find out more about the nature of our business, please click <http://www.tetrosyl.com/>.

In order to meet the varied demands of our customers we work with a range of suppliers of both raw materials and finished goods (the majority of which are UK based).

## 3: Policies

As part of our commitment to combating modern slavery, we have implemented a specific Anti-Slavery Policy.

In addition we are members of the Sedex Stakeholder Forum. As such our business is subject to regular ethical audits and we are completely committed to compliance with the ETI base code.

We also make sure our suppliers are aware of our policies, and adhere to the same high standards.

## 4: Due diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the following due diligence procedures:-

All of our suppliers are required to complete a Supplier Code of Conduct Questionnaire which has been formulated around the principles set out in the ETI Base Code.

A copy of the ETI Base Code is sent to all our suppliers at the same time as the Code of Conduct Questionnaire is sent out.

As well as undergoing annual Ethical Audits for our own customers we carry out audits on suppliers as and where required to satisfy our customers' requirements.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains
- monitor potential risk areas in our business and supply chains
- reduce the risk of slavery and human trafficking occurring in our business and supply chains
- provide adequate protection for whistle-blowers

## 5: Risk and compliance

Tetrosyl regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain by carrying out an annual Risk Review to ensure that any changes in its supply chain are assessed to see if any additional risks have arisen in relation to modern slavery and, if so to ensure that appropriate action is taken to address those risks.

We do not consider that we operate in high risk sectors or locations because the majority of our suppliers are UK based and we have an intimate knowledge of their operations.

We do, however, trade with overseas suppliers and whilst we may not have direct links with all elements in our supply chains by imposing strict compliance with our standards on the direct link in the supply chain we expect this to be fed back up the chain. Our Risk Review is informed by:

- The risk profile of individual countries provided by the Global Slavery Index.
- Awareness of those demographic groups or types of employees or workers who are considered to be more vulnerable for cultural or economic reasons
- The views of labour and human rights groups with specialist knowledge in this area.

We ensure all our suppliers adhere to our anti-slavery policy. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains. For example, if we find evidence of a failure to comply with our policies we will immediately seek to terminate our relationship with the relevant supplier.

## **7: Training**

We are currently reviewing our procurement process. This will ensure that appropriate training and guidance is provided for those with procurement responsibilities to assess the treatment of the workforce within suppliers' organisations to ensure that there is no exploitation of workers. Additional training will be provided as and when required for employees involved with any procurement where slavery and human trafficking is deemed to be a significant risk.

## **8: Effectiveness**

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to tackle slavery and human trafficking:

- Seeking a compliance statement from all our current suppliers.
- Amending our standard supplier terms to include an anti-slavery provision to which all new suppliers must agree to.
- Introducing this statement and our Anti-Slavery Policy as part of the induction process for new employees.
- Maintaining a register of concerns raised in this area and remedial actions taken to tackle modern slavery, forced labour or human trafficking within our supply chains.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Tetrosyl Limited's slavery and human trafficking statement for the financial year commencing 1<sup>st</sup> January 2016 and ending 31<sup>st</sup> December 2016.

David Rogers  
Group General Counsel

Tetrosyl Limited  
Date: 30<sup>th</sup> June 2017