



## **Anti-Slavery and Human Trafficking Statement**

### **Opening statement**

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. We are committed to the Principles of the Modern Slavery Act 2015 and we are committed to creating a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves,

### **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.

To find out more about the nature of our business, please click <https://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 and European based).

### **Definitions**

Tetrosyl Limited considers that modern slavery encompasses:

- Human trafficking
- Forced work through mental or physical threat.
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse.
- Being dehumanised, treated as a commodity or being bought or sold as property.
- Being physically constrained or to have restriction placed on freedom of movement.

## **Policies**

Our Policies in relation to the Modern Slavery Act 2015:

- Anti-Slavery and Human Trafficking Policy
- Child Labour Policy
- Ethical Code of Conduct
- Social Accountability Policy
- Equal Opportunities Policy
- Dignity In the Workplace Policy
- Disclosures In the Public Interest Policy (Whistleblowing)

In addition, we are members of the Sedex Stakeholder Forum. As such our business is subject to regular third-party 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.

## **Supply Chains**

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.

## **Due Diligence**

Tetrosyl Limited carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

Tetrosyl Limited has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

We do not consider that we operate in high-risk sectors or locations because the majority of our suppliers are UK and European 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.

The risk profile of individual countries is provided by the Global Slavery Index.

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 bring this to the immediate attention of the relevant supplier and impress upon them the crucial importance of the issue being addressed forthwith. We will work proactively with such suppliers so as to ensure full compliance with our policies. In the unlikely event that any of our suppliers fail / refuse to engage with us in this regard, despite our reasonable endeavours, we would then seek to terminate our relationship with the supplier/s concerned.

## **Training**

We ensure that appropriate training and guidance is provided for those with management and 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.

## **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 staff handbook and 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 period commencing 1st January 2024 and ending 31st December 2026.*

Signed Ian Tench - Group Managing Director for Operations and Commercial

16 January 2024

A handwritten signature in black ink, appearing to read 'I Tench', followed by a horizontal line extending to the right.