



Synthotech Modern Slavery Statement 2019

Synthotech publishes a Modern Slavery Statement, it refers to the requirements of Section 54 of the Modern Slavery Act 2015, although we are not obligated by the Act. Synthotech, as far as reasonably practical has taken and is continuing to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Synthotech has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to put effective systems and controls in place to safeguard any form of modern slavery taking place within the business or our supply chain.

Business

Synthotech is an innovate engineering company that provides specialist products and services to major asset utility infrastructure companies. We sell products to the UK and overseas markets. The majority of our suppliers are UK based and where possible we source materials locally, we have suppliers in Europe and internationally.

High Risk Area

Our high-risk suppliers are in China and Taiwan. We have had contact with these companies and carried out a risk assessment based on information received through supplier questionnaires. Our Far East Suppliers represent 8.6% of our purchases.

Our Policies

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Corporate Social Responsibility policy. This policy sets out Synthotech's stance on Corporate Social Responsibility, its ethical approach and approach to modern slavery. It explains how employees can identify any instances of this and where they can get help.
- Eligibility to work in the UK - Checking against human trafficking or individuals being forced to work against their will.
- Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices with our business or supply chain, without fear of reprisals.
- Integrated Management System. We operate an integrated management system incorporating H&S, Environmental and Quality policies and our commitment to ensure that we conform to statutory and regulatory requirements.

Suppliers

Synthotech operates a Supplier code of conduct. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that an organisation has never been convicted of any offences relating to modern slavery.

In addition to the above our Suppliers code of conduct includes a statement expecting our suppliers to

- Take steps to ensure that eradicate modern slavery within their business
- Hold their own suppliers to account over modern slavery
- (For UK based suppliers) They pay their employees at least the National Living Wage or National Minimum Wage
- (For International Suppliers) they pay their employees any prevailing minimum wage applicable within their country of operations

Training

We regularly conduct training for our staff so they understand the signs of modern slavery and what to do if they suspect it is taking place within our supply chain.

We will know the effectiveness of any steps taken to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

This Statement was approved at the Management Review Meeting on 25th November 2019

A handwritten signature in black ink, appearing to read 'Mark Tindley', is written over a faint rectangular stamp or watermark.

Mark Tindley

Managing Director

25 November 2019