Modern Slavery Act 2015

Introduction

This statement sets out Scott Bader’s actions to identify all potential modern slavery and human trafficking risks related to its business and to put in place steps that aim to prevent them occurring across its own operations and supply chains. This statement relates to actions and activities undertaken during the financial year ending 31st December 2020.

As part of the chemical manufacturing industry, Scott Bader recognises that it has a responsibility to take a robust approach to slavery and human trafficking, and is committed to ensuring its actions address both our global operations and our supply chains.

Organisational structure and supply chains

This statement covers the activities of Scott Bader Company Limited and associated Group Companies.

- Scott Bader Company Limited is wholly owned as a financial and social investment by The Scott Bader Commonwealth Limited, a Company limited by guarantee and a registered charity.

- Scott Bader Company Limited Group Companies consists of the following trading entities:
  - Scott Bader UK Limited (incorporating the Scott Bader Ireland Branch and the Scott Bader operations in Germany and Poland) – Manufacturing/Distribution
  - Scott Bader SA (France) – Manufacturing/Distribution
  - Scott Bader Iberica SL- Distribution
  - Scott Bader d.o.o. (Croatia) – Manufacturing / Distribution
  - Scott Bader Eastern Europe sro – (Czech Republic) - Distribution
  - Scott Bader North America Inc – Toll Manufacturing/Distribution
  - Scott Bader ATC Inc (Canada) – Manufacturing/Distribution
  - Scott Bader (Pty) Ltd (South Africa) – Manufacturing/Distribution
  - Scott Bader Middle East Limited– Manufacturing/Distribution
  - Scott Bader (Shanghai) Trading Co., Ltd– Toll Manufacturing/Distribution
  - Scott Bader Australia Pty – Manufacturing/Distribution
  - Scott Bader Japan KK – Distribution
  - Scott Bader Scandinavia AB - Distribution
  - Scott Bader | Satyen Polymers Ltd (India – Joint Venture) – Manufacturing/Distribution
NovaScott Especialidades Químicas Limitada (NovaScott) (Brazil – Joint Venture) – Manufacturing/Distribution

- The Scott Bader supply chain is largely petro-chemical in origin. For Scott Bader sites in Europe, the majority of suppliers are based in Europe and are subject to EU legislation.

**Regions of operation**

The organisation currently operates in the following regions:

- EMEA (Europe, Middle East and Africa)
- Americas (Canada, USA and Brazil)
- Asia Pacific (China, Australia and India)

**Responsibility**

Responsibility for the organisation’s anti-slavery initiatives are shared between the Group Procurement Manager and the HR Manager which include, but are not limited to:

**Relevant policies**

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Group Whistleblowing policy** - The organisation encourages all of its colleagues to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation’s whistleblowing procedure is designed to make it easy for colleagues to make disclosures, without fear of retaliation. Colleagues who have concerns can make a “protected disclosure” – which provides them with legal protection against any detriment as a result of making a disclosure.

- **Company Values and Commonwealth Membership** - The organisation’s code of practice makes clear to Colleagues, the actions and behaviour expected of them when representing the Company. Scott Bader strives to maintain the highest standards of Colleague conduct and ethical behaviour when operating abroad and managing its supply chain. Colleagues who are members of The Commonwealth, commit to:

  “… the success of Scott Bader

Accepting the responsibilities and obligations of being a trustee in common of the assets of the organisation.

Behaving unselfishly and trying at all times to promote the Values (Commitment, Responsibility, Fairness and Teamwork) both within Scott Bader and beyond.
Making an undertaking to actively assist in extending the membership within Scott Bader through helping others to understand the principles of the organisation and the Scott Bader “way of working and doing business” in accordance with values.

- **Scott Bader Ethical Purchasing Policy** - Scott Bader will work with suppliers that act in a way which is aligned to Scott Bader values and will always take preference to work with suppliers of materials where their ethical and environmental policies are aligned with our own ethical values.

  Scott Bader will always look to develop long term partnerships with our suppliers which are mutually beneficial, and will work closely to build relationships – Partner for Excellence - with suppliers which respect the ethical, fairness and environmental values of Scott Bader.

  Scott Bader will always reject both current and prospective suppliers which engage in unlawful practices.

  Serious violations of the organisation’s expected supplier conduct will lead to the termination of the business relationship.

- **Resourcing Policy** - The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

  **Due diligence**

  The organisation undertakes due diligence for new direct suppliers and reviews existing suppliers.

  **Contractual Requirements**

  The organisation commits to review all contracts newly authored by Scott Bader in light of the introduction of the Modern Slavery Act 2015 in order to ensure that suppliers undertake to support Scott Bader in complying with all applicable law relating to slavery and human trafficking.

  **Training**

  The organisation requires the HR Manager and the Group Procurement Manager within the organisation to complete training on The Modern Slavery Act 2015, and to cascade this information to their respective teams.

  The organisation are in the process of renewing training for all colleagues within the UK and relevant countries in the form of online learning linked to Scott Bader’s Ethical Purchasing Policy.

  The organisation’s training on awareness of modern slavery issues includes:

  - **The Modern Slavery Act 2015**: The Act, passed in March 2015, tackles the crimes of holding another person in slavery, servitude, forced or compulsory labour or trafficking a person.

  - **How does the Act affect us?**: We have to show we are taking effective measures to stamp out slavery by publishing an annual Human Slavery and Trafficking statement. We have to republish it every year, showing the progress we’ve made.
You have to help us: We have a responsibility to report any suspicions we may have – in confidence.

What is modern slavery?: What are the types of slavery and human trafficking.

how to identify the signs of slavery and human trafficking;

what initial steps should be taken if slavery or human trafficking is suspected;

Awareness-raising programme

As well as training colleagues, the organisation is in the process of raising awareness of modern slavery issues through various mediums, including email and video links.

The emails explained to colleagues:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what colleagues can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

Sustainability Training

As part of Scott Bader’s 2036 strategic initiatives, Sustainability plays an important part in achieving our aims. There was training during 2018 to focus on the Sustainability goals for the organisation which included specific references to ensuring effective sustainability through:

“ensuring that People are not subject to conditions that systematically undermine their capacity to meet their needs”

In 2020 a sub-committee of the Board of Scott Bader Company Limited was established with a specific focus on sustainability. In addition, an initiative was established to develop more effective ESG reporting for the Group going forward.

Sustainable procurement with Ecovadis

To strengthen its ability to assess its supplier base, Scott Bader signed up in 2019 to Ecovadis, a world leading provider of business supplier sustainability ratings and improvement tools for global supply chains. The 21 criteria used by Ecovadis cover the four categories of environment, labour and human rights, ethics and sustainable procurement. They follow verifiable international CSR standards including: the Global Company Principles, the International Labour Organisation conventions, the Global Reporting Initiative Standard and ISO 26000.

The performance of Scott Bader’s suppliers will be assessed and the resulting Scorecards used to benchmark suppliers performance. The tool is a starting point for effective dialogue between Scott Bader and its suppliers on actions being taken to improve supplier CSR performance.
Integrating Ecovadis into Scott Bader’s supplier sustainability framework will maximise transparency in this area, while continuously monitoring and improving the quality and sustainability of our supply chains for the benefit of our customers, employees, stakeholders and environment.

**Board approval**

This statement has been approved by the organisation's board of directors, who will review and update it annually.

**Group Chief Executive’s signature:**

Kevin Matthews  
**Date:** 1st December 2020