

Modern Slavery and Human Trafficking Statement

Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 31st March 2023 onwards.

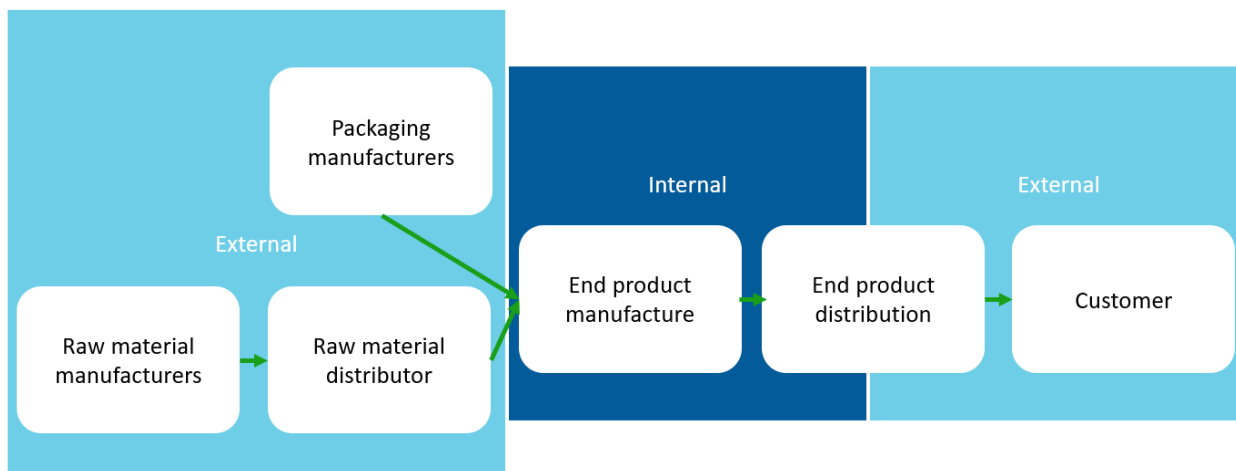
Sky Chemicals (UK) Limited is committed to preventing slavery, exploitation and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

Organisational Structure and supply chains

Sky Chemicals (UK) Limited has business operations in the United Kingdom.

We operate in the manufacturing, supply, and distribution of disinfectants to the healthcare and hygiene sectors, along with providing a range of cleaning products to various industries.

The nature of our supply chain is as follows:



Sky Chemicals do not work with suppliers in any of the high risk countries and do not manufacture or distribute any of the materials found to be high risk. This is a policy we intend to move forward with and implement with our suppliers.

Policies in relation to Modern Slavery and human trafficking

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include the following:

Sky Chemicals (UK) Ltd, Unit 12 Sheffield Design Studios, 40 Ball Street, Sheffield S3 8DB



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40 Ball St
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- Recruitment Policy
- Staff Code of Conduct Policy
- Safeguarding Policy
- Supplier Code of Conduct Policy
- Sustainability Policy

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

Due Diligence

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

- Supplier screening to ensure conformance to these principles
- Supplier audits (in person or virtual) according to the audit schedule
- Annual audit programme review to ensure compliance with the latest developments
- Audit programme that discusses policies that protect against the ILO Indicators of Forced Labour

Our due diligence procedures aim to:

- Identify, monitor, and rectify any potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking in our business and supply chains
- Provide protection for whistle-blowers reporting relevant issues

Currently all areas of the policy are monitored by the Board of Directors. As our needs develop we may seek external consultancy to further improve on eliminating modern slavery in our supply chain.

Risk Assessment and Management

The company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

- Evaluating the slavery and human trafficking risks of each new supplier
- Screening existing suppliers for conformance
- Maintaining a Failure Modes Effects Analysis Procedure to record, monitor, and rectify any issues

We do not consider that we operate in a high-risk environment because all of our suppliers are UK based, in low risk industries and do not use the materials defined as high risk.

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We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will seek to terminate our relationship with that supplier immediately.

Effectiveness

The company uses annual supplier audits of suppliers to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. To improve effectiveness of audits, training is offered externally to support suppliers in improving their Modern Slavery Assessments. Where an audit raises issues, the training will be strongly recommended. The training offered covers:

1. Identifying risk in their own organisation
2. Identifying risk up the supply chain
3. Due diligence
4. Built in resilience
5. Auditing
6. Risk measurement and tools available (ILO, Dhaka Principles)

If the supplier does not comply with training and audit improvements, we may choose to use a different supplier.

In addition to this, training is provided to the whole organisation, including HR, executives and Directors, procurement, to ensure effectiveness. Training can consist of updates to company policies, webinars, workshops or taught sessions. Where a supplier is considered high risk, they are strongly encouraged to attend the training sessions. In recent whole organisation meeting minutes, the Modern Slavery Policy updates were communicated and the Indicators of Forced Labour discussed. The organisation brought many ideas on how to further improve our audit programme. Additionally, updated grievance mechanisms memorandums were distributed.

Our training resources include:

<https://dhakaprinciples.org/>

https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed_norm/@declaration/documents/publication/wcms_203832.pdf

<https://www.walkfree.org/global-slavery-index/#the-scale>

https://assets.publishing.service.gov.uk/media/61b7401d8fa8f5037778c389/Transparency_in_Supply_Chains_A_Practical_Guide_2017_final.pdf

<http://southyorksmmsp.co.uk/>

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Contact details can be found at the end of this document.

Whistleblowing

We've found the most effective way for us to implement resilience to modern slavery is to build on existing policies of a zero tolerance for discrimination against any protected characteristic, and building a working environment where staff are comfortable that they can raise issues. In order for employees to feel comfortable in doing so, we have implemented an anonymous whistleblowing service in which the employee is to type up their issues and drop it in the company letterbox. The issue will be dealt with by Directors. As Sky Chemicals is a small company, it is difficult to ensure total anonymity as a department may consist of 1 person. To provide additional support, Sky Chemicals Board of Directors is willing to meet with trade unions or other worker representative groups.

Improvements Made

We have now evaluated the impact of the following aspects on our risk and have managed them appropriately:

Risk	Improvement
Aggressive pricing that does not consider sustainable production costs.	The pricing given is on trend with global price fluctuations on based on various factors including energy prices, raw material availability etc., whilst still being commercially competitive.
Short lead times.	Our inventory now holds additional stock to ensure that lead times are acceptable.
Late high-volume orders.	We do not place late orders unless exceptionally needed. In this case we have a policy to work closely with assessed suppliers to minimise risk.
Inaccurate forecasting.	Our forecasting is communicated clearly to suppliers in advance of purchasing. Suppliers are instructed to notify us if our order volume over a period falls outside of our projected totals.
Withdrawn from contracts last minute.	Withdrawal triggers an immediate audit for modern slavery.
Unfair penalties for not meeting orders despite last minute changes.	Supplier terms and conditions are assessed for risk of unfair penalties on receipt. We do not change POs, only reissue for new products if ordered incorrectly. Goods overordered are returned according to policy.

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Inaccurate technical specifications.	Technical specifications are provided with Purchase Orders and the goods delivered cross-referenced to ensure compliance. Certificate of Analyses are completed for finished goods.
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Our updated requirements review schedule shows that we continually update our understanding of the Modern Slavery Act 2015 and our audit schedule shows our application of this to ourselves and our suppliers.

Next Steps

In the next financial year, we intend to take the following steps to tackle slavery and human trafficking by:

1. Suppliers with annual spend >20% of total annual expenditure audited by the end of 2024
2. Suppliers with annual spend >5% of total annual expenditure audited by June 2025
3. Internal training delivered within 4 weeks of the most recent policy update
4. A second training session delivered by the end of 2024
5. 100% of new suppliers onboarded with annual spend projected over £10000 audited within the first 6 months
6. Host an improvement session for our auditing programme
7. Continue to measure all improvements made above

This statement was approved by the board of directors.



Michael Joseph
Managing Director
Sky Chemicals (UK) Ltd



James Cutts
Director
Sky Chemicals (UK) Ltd



Hugh Sutherland
Director
Sky Chemicals (UK) Ltd



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If you need to speak to somebody about modern slavery:

Call the Modern Slavery Helpline anonymously on 08000 121 700 to get help, report a suspicion or to seek advice. Or report an incident online at www.modernslaveryhelpline.org/report

Call the police on 999 in an emergency, where there is a threat to life or a crime in progress or to report an incident that isn't an emergency call the police on 101.

Call the Salvation Army Modern Slavery referral helpline on 0300 3038 151 for confidential advice and to get support for potential victim(s) of modern slavery.

Additional local resources are available at the South Yorkshire Modern Slavery Partnership:

<http://southyorksmsp.co.uk/>

Phone: 0114 255 5740

Email: SYMSP@ashianasheffield.org