

# Alcohols Ltd - Modern Slavery Statement

## Introduction

The W.H.Palmer Group means W.H.Palmer & Co. (Industries) Ltd and its subsidiary companies, Alcohols Ltd and Trithin Products Ltd, including business traded under the trade name of Langley Distillery.

Within the W.H.Palmer Group (“the Group”), Alcohols Ltd is the only company with a turnover in excess of £36 m and is the largest trading company of the Group. The Group operates from the UK, and it has no operations overseas.

Alcohols Ltd is a supplier of a wide range of solvents, chemicals, and solvent blends to customers in various sectors within the UK and worldwide. It also manufactures and supplies gin and potable spirits to customers in the UK and Europe. Much of its supplies and raw materials are sourced from UK-based suppliers. Some chemicals, and in particular alcohol, are sometimes supplied by partners based in western Europe. Occasionally, raw materials are purchased from suppliers based outside Europe. These suppliers would naturally present a higher risk with regards to Modern Slavery compliance, as all businesses within the UK and EU are governed by similar Modern Slavery legislation.

Alcohols Ltd’s 100% owned subsidiary, Trithin Products Ltd, distributes specialised chemical and industrial products around the world. Most of its usual suppliers are based in the United Kingdom and European Community. However, from time to time, the Group will source material from elsewhere in the world, while following our Modern Slavery and Human Trafficking Policy.

Slavery and Human Trafficking remains a hidden blight on our society. We all have the responsibility to be alert to the risk, however small, in our business and in the wider supply chain.

We believe that people should be treated with dignity and respect, not only in the workplace, but in the communities where we do business.

As an employer, the Group takes its responsibilities in relation to the prevention of modern slavery and human trafficking very seriously and committed to the protection of human rights.

Our policy applies to employees, workers, and contractors.

## The Policy

Modern slavery is a crime and a violation of fundamental human rights. Slavery can take various forms, including servitude, forced and compulsory labour, child labour and human trafficking. It can also involve withholding of passports or restricting workers’ movements to controlled locations. Workers should always have the right to terminate their employment of their own free will, without punitive consequences.

The Group has a Modern Slavery and Human Trafficking Policy which can be found by clicking on the link below:

[[link to policy saved on the website](#)]

The Group is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or any part of the business.

We are committed to acting ethically and with integrity in all our business relationship and taking reasonable steps to ensure slavery and human trafficking are not taking place in any business or organisation that has any sort of a business relationship with the Group.

The policy outlines 10 key principles, to which the Group is committed, in order to eliminate modern slavery from our business. These principles are derived from the Modern Slavery Act 2015 (the "Act"). Any business complying with these principles will be compliant with UK and EU Modern Slavery legislation.

In addition, the policy explains that all the Group's employees are recruited in and based in the UK. The Group complies with all UK employment legislation, including laws relating to minimum pay and discrimination. Recruitment procedures and employment policies are overseen by the Board of Alcohols Ltd. In its recruitment and employment of employees, the Group complies completely with the Act.

### **Supply Chains**

The Group has zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

We maintain a level of communication and personal contact with the next link in the supply chain to ensure their understanding of, and compliance with our expectations.

In undertaking due diligence on suppliers, the Group takes a risk-based approach to its assessment of our suppliers' compliance with our Modern Slavery and Human Trafficking Policy.

We use supplier self-certification to confirm compliance and carry out periodic supplier visits, where possible. Most suppliers are based in Europe, or the UK and all key suppliers obliged to be listed on the Group's approved supplier list. As part of obtaining approved status, suppliers are required to confirm their adherence to our 10 key modern slavery principles as part of our supplier due diligence process. Alternatively, we will review suppliers' published Modern Slavery statements, to ensure they comply with the Act.

Where there is evidence of modern slavery within its supply chain, we explain to the supplier in question why modern slavery and human trafficking must be eliminated and will work with them to ensure that this is done.

If elimination of such practices cannot be carried out to the satisfaction of the Board, the Group will cease trading with the supplier in question.

To date, we have come across no examples of breaches of our modern slavery principles.

### **Communication and Reporting Issues**

The management is responsible for compliance within their respective departments and in their supplier relationships and have been trained accordingly on the key foundation principles of the policy.

There is a company induction and regular refresher training to staff covering our policies, key principles, the Group's working practices, how to identify the signs of slavery and trafficking and how to influence suppliers to ensure that slavery and human trafficking is eliminated from businesses further down the supply chain.

Our employees are encouraged to report to their line manager or any director any suspicions that modern slavery or human trafficking is taking place in the business or our supply chain. The company commits to ensuring that any employee reporting such suspicions in good faith will not suffer any detrimental treatment.

Slavery may be closer to you than you think. If you suspect modern slavery, report it to the Modern Slavery Helpline on 08000 121 700 or the police on 101.

Don't leave it to someone else. Your information could save a life.

This statement was signed on behalf of the Board of Directors of Alcohols Ltd on 30<sup>th</sup> August 2023.

A handwritten signature in blue ink, appearing to read 'A Wallis', is positioned above the printed name.

Adam J Wallis

Director