

# THE W.H.PALMER GROUP

## MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

### Definitions

**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.

### Introduction

The W.H.Palmer Group (“**the Group**”) is a chemical distributor supplying a wide range of solvents, chemicals and solvent blends. It also manufactures and supplies gin and potable spirits. Through Trithin Products Ltd, the Group distributes specialised chemical and industrial products around the world. As an employer, the Group takes its responsibilities in relation to the prevention of modern slavery and human trafficking very seriously.

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 Modern Slavery Act 2015 was implemented into UK law in October 2015. UK businesses with an annual turnover of more than £36m are required, under section 54(1), to publish an annual statement detailing the steps that it is taking to ensure that slavery and human trafficking is not taking place in its organisation or supply chain.

### Anti-Slavery Principles

The W.H.Palmer Group publishes its annual statement in compliance with section 54(1) on its website and the statement makes reference to this policy. The Group has committed to applying the following 10 key principles in order to help eliminate modern slavery in our business and supply chain:

1. We will not employ child labour, being defined as the employment of a child under the minimum legal working age of the country in which they are employed. We will take particular care of any worker under the age of 18 to ensure that they come to no physical or mental harm as a consequence of the work they are doing or their working conditions.
2. Workers will not be subject to forced, bonded, compulsory or trafficked labour.
3. Workers and their families will not be subject to inhumane treatment, including physical or psychological abuse, intimidation or violence.
4. Workers will be free to move, without unreasonable direct or indirect restriction.
5. Workers shall have the terms of their employment set out in a written document, clearly explaining their rights and obligations including, but not limited to, their rate of pay, working hours and their right to rest breaks and holidays.
6. Workers will have a right to express their grievances relating to their treatment by their employer, without fear of suffering any consequential discrimination or victimisation.
7. Workers will have the right to terminate their employment freely, following a reasonable period of notice, without suffering any improper penalties.

8. Workers will not have their passports, travel documents or any other personal items confiscated or withheld as a condition of their employment.
9. Workers will not have to pay any fee or cost as a condition of their employment.
10. Workers have the opportunity to report to senior management, without fear of suffering any detrimental treatment, any suspicions held in good faith that modern slavery in whatever form is taking place in the business or the business's supply chain.

### **Responsibility for this Policy**

The Board of directors of the W.H.Palmer Group is responsible for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Management at all levels are responsible for ensuring that those reporting to them understand and comply with this policy. Relevant staff are provided with training on our modern slavery obligations and principles. Our Slavery and Human Trafficking Policy is made available to all staff.

### **Recruitment and Employment**

All employees of the Group are based in the UK and recruitment and employment policies are controlled by the Board. The company complies with all employment legislation, including laws relating to minimum pay and discrimination. The Board controls of the recruitment process and payroll ensures that our modern slavery principles are always applied to our staff's employment.

### **Supply Chains**

The relationship with our suppliers has been established for a number of years and many of them are based in the UK or Europe. We take a risk-based approach to our assessment of our suppliers' compliance with our Slavery and Human Trafficking policy and use supplier self-certification to confirm compliance. We also carry out periodic supplier visits. New suppliers are required to confirm their adherence to our policy, or provide access to their own Modern Slavery Statement, as part of our supplier due diligence process.

### **Reporting Issues**

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.

This Policy will be communicated to all persons working under the control of the organisation and will be made available to interested parties (internal and external) upon request. The Group will ensure that all employees fully understand the policy and its contents.



A J Wallis  
Managing Director  
January 2025