

Slavery and human trafficking statement - Distrupol Ltd

(relating to the financial year ended 31 December 2017.)

Modern slavery is a crime resulting in an abhorrent abuse of human rights. The term ‘modern slavery’ is used to encapsulate the crimes of slavery, servitude, forced or compulsory labour and human trafficking. We are striving to combat modern slavery within our organisation and supply chains. The purpose of this slavery and human trafficking statement is to show what we as a company have done in the last financial year and what we are doing going forward.

Distrupol has a proud history of corporate responsibility and we value our integrity as a core and defining characteristic of how we operate. We believe that in today’s global economy it is even more important for companies to act as responsible corporate citizens and to make their commitment known to responsible third parties. Whenever we are faced with difficult decisions during the course of our business, Distrupol always chooses the ethical course of action.

Distrupol already has a Code of Conduct that covers the company’s values on modern slavery and human trafficking. In the past year we have produced this statement together with a Slavery and Human Trafficking Supplier Questionnaire as part of the Company’s due diligence processes in supply chains where there is a risk of modern slavery and human trafficking taking place. We have also produced an Anti-Modern Slavery internal policy which is available to all of our employees.

In the coming year we will broaden our scope for supply chain mapping. We will further develop our audit and risk assessment program and progress training for all our employees to increase awareness and combat slavery and human trafficking within our supply chains.

Our organisation's structure, our business and supply chains

Distrupol Ltd is a trading company within the UK and is working to ensure that adequate controls are applied to ensure that slavery and human trafficking are not taking place in any part of the relevant business. The ultimate parent company of Distrupol Ltd is Univar Inc. Univar Inc. has its Commercial Headquarters in the United States of America at Downers Grove, IL.

Founded in 1924, Univar is a leading global distributor of chemicals and innovative services. The company operates a network of over 850 distribution facilities throughout North America, Western Europe, the Asia-Pacific region, and Latin America, with additional sales offices located in Eastern Europe, the Middle East, and Africa. Univar sources from over 8,000 producers worldwide and serves more than 160,000 customer locations with a full portfolio of specialty products and ingredients, and basic chemicals. Our high-growth and value-added service offerings are key differentiators in the market.

With a worldwide team of more than 9,000 employees, our scale, geographic reach, comprehensive product portfolio, and value-added services provide us with a distinct competitive advantage by providing a single-source solution for our customers.

For the financial year ended 31 December 2017 Distrupol Ltd had a turnover in excess of £36M. Final figures will be publically available in the coming year.

What is our business?

Distrupol is a leading global distributor of chemistry and related innovative products and services. We safely deliver chemistry (products, expertise, and relationships) that helps our customers improve the quality of life through; Affordable energy, Clean drinking water, Reliable food sources and Products that improve our health, homes and environment.

Our supply chains

Distrupol is a world leader in the global distribution of chemistry and related products and services. Our suite of distribution services enables us to serve our customers everywhere, every day, so that they have the products they need, when they need them.

Our policy on modern slavery

As an organisation we are committed to ensuring that there is no modern slavery:

- in any part of our supply chains; or
- in any part of our business.

Our Anti-Modern Slavery Policy reflects our commitment to implementing and enforcing effective processes and controls to ensure modern slavery is not taking place anywhere in our organisation or supply chains and to encourage and protect whistle-blowers. This policy is available on request.

Due diligence processes in relation to modern slavery

We have produced and issued our Modern Slavery Statement and Questionnaire to identify and mitigate the risk of modern slavery. The questionnaire is designed to be issued through our supply chain to:

- Identify and assess potential risk areas in our business and supply chains;
- Mitigate the risk of modern slavery occurring in our business and supply chains;
- Monitor potential risk areas in our business and supply chains.

This questionnaire is available on request.

In addition, we have:

- Updated our new supplier questionnaire to capture our principles of modern slavery compliance under international labour laws.
- Revised and updated our standard terms and conditions across our entire EMEA business to capture the requirements to Suppliers and Customers to not only adhere to our internal policies and procedures but to also have in place their own policies and procedures to ensure compliance.
- Revised and updated our Global Code of Conduct to incorporate required levels of Labour Standards for anybody who works with us,

Behaviour of our supply chains

We have a zero tolerance policy towards modern slavery. To ensure all those in our supply chains and contractors comply with our values and ethics we have a compliance team to implement our regulatory compliance programmes. This consists of Company representatives with active involvement from the following departments:

- Legal;
- Audit and compliance;
- Human resources;
- Procurement; and
- Sales.

Training on modern slavery

We provide mandatory training to all our staff in order to ensure a high level of understanding of regulatory risks in our supply chains and our business. Through Top Level Commitment, additional modern slavery training will come from our tried and tested Training the Trainer programs. In due course, we will also be seeking confirmation our business partners are providing training to their staff, suppliers and providers and will offer support where practicable.

Our effectiveness in combating modern slavery

We are conducting external and internal reviews of our processes to give insight on ways that we can tackle modern slavery in our organisation and supply chains. We are designing appropriate KPIs to assess how effective we are and how we will continue to combat slavery and human trafficking within our supply chains.

Future steps

Following a review of the effectiveness of the steps we have taken so far to ensure that there is no modern slavery in our business or supply chains, we propose taking the following further steps to combat modern slavery:

- We will be undertaking further supply chain mapping through our direct and indirect suppliers by issuing and reviewing our Slavery and Human Trafficking Supplier Questionnaire.
- We will assess the results of our findings to create audit and risk assessment programs.
- We will provide training for all our employees to increase awareness and combat slavery and human trafficking within our supply chains.

This statement is made in accordance with the Modern Slavery Act 2015 section 54(1) and constitutes Distrupol's slavery and human trafficking statement for the financial year ending 31 December 2017.

Signed on behalf of the board of directors,



Sabine Duyfjes
Chief Compliance Officer; General Counsel & VP HR EMEA
Univar BV