

### **Modern Slavery Policy**

# Slavery and Human Trafficking Statement for the year ended 31st December 2024

### **Our Policy**

Industrial Chemicals Group Limited and its subsidiaries, including Industrial Chemicals Limited, is opposed to slavery and human trafficking in any part of our business or our supply chain. We have a zero-tolerance approach and are fully committed to ensuring that we have adequate policies and procedures in place to identify and prevent these practices.

We met the turnover threshold applicable to Section 54 of the Modern Slavery Act 2015 in the period covered by the report.

#### **Our Business**

We are a manufacturer and distributor of chemicals and associated products. More detailed information is available on our website at <a href="https://www.icgl.co.uk">www.icgl.co.uk</a>

#### **Our Structure**

Our business is integrated but covers – Strategy, Business Development, Sales, Production, Distribution, Engineering, Energy and Support Services (including Finance, HR, Legal, Health, Safety, Environmental, Quality, Technology and Administration). Each department and site operates with the same company ethos, standards and policies including Modern Slavery.

We only source products from reputable suppliers and the largest areas of procurement spend are with international providers of chemicals, raw materials, equipment and services. We ensure that they have a Modern Slavery Policy and a related Statement. We are working with smaller localised suppliers of goods and services, including third party transport, to ensure they embrace the principles and take action with robust processes on slavery and human trafficking.

### Our policies on Slavery and Human Trafficking

Our policy is to act ethically and with integrity towards our employees and in all our business relationships. In addition, the Group seeks to ensure that all the products we sell meet applicable legal and ethical standards.

Registered in England No: 3886037 VAT No: GB 507 5376 42

Our policy on Slavery and Human Trafficking is set out at the commencement of this statement.

## **Procedures on Slavery and Human Trafficking**

As part of our compliance with the policy referred to above, we take the following steps:

- Assess potential risk areas in our supply chain. We consider this to be small, but we
  have alerted relevant managers and staff to the risks of slavery and trafficking
- Mitigate the risk of slavery and human trafficking occurring in our supply chain, including reviewing, where necessary, the controls that our suppliers have in place and carrying out other suitable checks as appropriate
- Monitor potential risk areas on a periodic basis, including changes within suppliers
- Use reputable manufacturers, distributors and contractors who have controls in place to ensure compliance with the Modern Slavery Act
- Use reputable shipping agents who have in place controls to ensure that any charter ship owners comply with the Modern Slavery Act

### **Assurance and Key Performance Indicators**

We have implemented procedures to check and report compliance with this policy and to measure the coverage of our supply chain with a clear Modern Slavery and Human Trafficking Policy.

We employ 480 staff across six sites in England and two in Wales.

We have no evidence to suggest any breach of our Slavery and Human Trafficking Policy in the year ended 31<sup>st</sup> December 2024 or the six months to 30<sup>th</sup> June 2025.

We believe we have a low risk of modern slavery in our business and supply chain based on the action taken including training and raising awareness of the issue.

### **Nature of this Statement**

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes our latest Slavery and Human Trafficking annual statement.

Edwin Strang,

Director