



**2M Group Ltd: Modern Slavery Policy Statement**  
**Financial Year May 2019 – April 2020**

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

The 2M Group has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all its business dealings and relationships. 2M Group companies implement and enforce effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015.

2M expects the same high standards from all of its staff, suppliers, contractors and other business partners and expects that their suppliers will in turn apply the same standards along their supply chains.

***Action Taken/To be Taken***

As a group purchasing speciality chemical products from a number of countries around the world, transparency from the manufacturers of these products and subsequent supply chains is vital in our fight against Modern Slavery. It is within these supply chains that there may be a risk of slavery and human trafficking.

2M accepts that it has a responsibility through its own due diligence processes to ensure that employees are not being exploited, are not subjected to poor labour practices, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

As part of our initiative to identify and mitigate risk the 2M Group has undertaken a review of its procedures to ensure there is no slavery or trafficking within its supply chain and its own business.

2M Group companies have introduced policies detailing its zero-tolerance approach to modern slavery and how notification to senior management must be reported.

CSR 02 - ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY.docx  
CSR 03 - ANTI BRIBERY POLICY.docx  
CSR 04 - CODE OF CONDUCT FORM.docx  
CSR 05 - MODERN SLAVERY POLICY STATEMENT 2017 -2018.docx  
CSR 06 - EQUAL OPPORTUNITIES AT WORK.docx  
CSR 07 - PERSONAL DEVELOPMENT POLICY.docx  
CSR 08 - DISCLOSURES IN THE PUBLIC INTEREST.docx  
CSR 09 - DIGNITY AT WORK POLICY.docx

Newly acquired businesses employment practices are subject to review by the group's Director of HR and relevant senior management to ensure employment contracts take account of Modern Slavery, and there are appropriate and relevant company policies including a Health and Safety and Social Accountability Policies and guidelines to demonstrate commitment to safe, lawful and ethical standards with its own employees.

2M will ensure that questionnaires are sent to supply chains to ascertain what ethical trading practices are in place. This is to be further developed to include a statement specifically requesting a commitment to anti-slavery and human trafficking.

Where a 2M Group company uses a 3<sup>rd</sup> party employment agency they shall ensure employment is not subject to modern slavery and all health and safety and human rights laws and standards are being adhered to.

As we are committed to ensuring the group's compliance with the Modern Slavery Act 2015 the effect of our procedures will be monitored by way of audit where it is warranted.

The 2M group is implementing an Integrated Management System over the next three years that will incorporate CSR policies within its core policies and procedures and be certified to ISO 9001/2015, ISO 14001/2018, ISO 45001/2018, and Eco Vadis. Regular audits will be undertaken in accordance with the requirements of these standards.

### ***Responsibility for the Policy***

The 2M Group Compliance Director will have overall responsibility for ensuring that this policy complies with the Group's legal and ethical obligations.

Purchasing Departments are responsible for monitoring supply chain compliance with ethical, anti-slavery and human trafficking policies. The Purchasing Departments and company senior management are responsible for investigating allegations of modern slavery within the Company's supply chain.

### ***Training and communication***

As part of 2M's commitment to ensure compliance with their obligations under the Modern Slavery Act 2015 the 2M Modern Slavery Policy will be circulated to all staff. Training will also be conducted so that staff are aware of how to identify exploitation and modern slavery and how to report suspected cases.

2M's zero tolerance approach to modern slavery will also be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

**This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year for**

**2M Holdings Ltd**

**Samuel Banner & Co Ltd**

**MP Storage & Blending Ltd**

**Packed Chlorine Ltd**

**Stowlin Ltd**

**Prism Chemicals Ltd**

**Banner Chemicals Benelux NV**

**CE- O2 Trockeneis GmbH**

**Surfachem Group Ltd**

**Surfachem Ltd**

**Filrite Ltd**

**Surfachem Deutschland GmbH**

**Surfachem Brasil Ltda**

**Surfachem Nordic A.S.**

**Samplerite Ltd**

**Samplerite Qingdao Ltd**

**Mottie Kessler**

**Chairman/CEO**

**2M Group Ltd**

**July 2020**