

# Modern Slavery Statement for the Financial Year 2020/2021

## Our Suppliers

The Fragrance Oils Group of Companies operates a supplier policy and maintains a preferred supplier list.

In accordance with section 54(4) of the Modern Slavery Act 2015, Fragrance Oils has contacted (or attempted to contact) all first tier suppliers to set out our zero tolerance stance on modern slavery and to ensure that slavery and/or human trafficking is not taking place.

Fragrance Oils has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with slavery and/or human trafficking.

Fragrance Oils believes its exposure to modern slavery to be limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business or the business of any organisation that supplies goods and/or services to it.

Modern slavery is a complex phenomenon and our risk assessment is intended to give us an insight into the supply chain in order that we can plan, if necessary, appropriate action.

With regard to new suppliers, all new suppliers are asked due diligence questions to determine the steps that they take to eliminate slavery and human trafficking from their supply chain. This forms part of the evaluation criteria behind our selection of new suppliers.

In the operation of its business, Fragrance Oils main supply chains are those related to the provision of raw materials and services.

## Our Policies

Within the Fragrance Oils organisation, the Givaudan Principles of Conduct is a governing charter for ethical behaviour including:

- **Legal and Ethical Dealings provision.** Givaudan believes in compliance with all laws and policies that apply to our business in the countries in which we operate. We are committed to and adhere to the highest ethical standards in all business dealings.
- **Responsible Corporate Citizenship provisions.** We are committed to respect for human rights wherever we do business and in all communities in which we are present. We believe in fair employment standards and do not tolerate or practice any form of child exploitation or forced labour or engaged with suppliers who do not adhere to a strict anti-slavery policy.
- **Disclosure and Transparency Policy.** We encourage all our employees, contractors and workers to come forward with any concerns regarding how colleagues are being treated, practices within our business or supply chain or any violations against any policy operated by us without fear of retaliation or reprisal. If our employees do not feel comfortable contacting their local compliance officer or legal department, they are encouraged to use the Givaudan Compliance Helpline which is confidential and operated in every Company language.



Fragrance Oils

## **Modern Slavery Statement for the Financial Year 2020/2021**

### **Introduction**

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that the Fragrance Oils Limited Group of Companies ("Fragrance Oils") has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Fragrance Oils has a zero tolerance approach to any form of modern slavery. We will refrain from entering into business, and/or will discontinue any current business with any other organisation which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour. We are committed to preventing slavery and human trafficking within our own business and in our supply chains and to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### **Our Policy**

We accept that we have a responsibility to ensure so far as is possible, that workers are not being exploited, 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 communication. If we believe that these rules are not being adhered to, we will notify the relevant authorities.

Fragrance Oils is committed to ensuring that our employment practices and the enforcement of corporate regulations ensure the protection of the rights of all those who work for us. We will work towards creating long-term relationships with all employees ensuring they are treated with dignity and respect with equal employment opportunities given to all irrespective of their race, religion, gender, sexual orientation or any other characteristics protected by law. The Company is registered with the Living Wage Foundation and is an accredited UK Living wage employer paying above the living wage hourly rates for all Fragrance Oils UK employees and the living wage hourly rate in the case of some UK agency workers.

### **Our Business**

We are manufacturers of Perfume Compounds and Herbal Extracts for use in personal care and household toiletries and operate in over 80 overseas markets through agents and distributors.

Fragrance Oils, is part of a larger group (Givaudan UK Limited, Givaudan 2007 UK Limited, Givaudan Holdings UK Limited (the UK Companies referred to as "Givaudan")) who are a leading business in this sector.

We manufacture solely at our site in Radcliffe, Manchester, United Kingdom, whilst utilising the Givaudan china manufacturing footprint for contract manufacturing.

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In addition to the Principles of Conduct, Givaudan has further policies and procedures including:

- **Global Anti-Bribery Gifts, Entertainment and Hospitality elements are all covered in our Code of Conduct Policy.** This Policy sets out Fragrance Oils ethical behaviour standards and the principal anti-corruption rules that apply to our business.
- **Responsible Sourcing Policy.** This policy outlines the most basic health and safety, social, environment and business integrity principles we expect from all of our suppliers and service providers.

Givaudan, at group level, is also a signatory to the United Nations Global Compact ("UNGC") which includes principles in the areas of human rights, labour and anti-corruption.

## **TRAINING**

Upon commencement of employment, all employees undergo a structured induction process. All employees are made aware of the Fragrance Oils policies relating to the required standards of behaviour.

Fragrance Oils will continue to provide training on awareness of modern slavery to those within the business who have been identified as having responsibilities in this regard, namely those involved in purchasing and selling.

## **COVID-19**

Fragrance Oils is performing regular risk reviews to assess the impact of the Covid-19 pandemic on its strategy, operations and supply chains. This risk assessment is reviewed by Fragrance Oils executive committee and board of directors at regular intervals.

Among the risks identified and managed are the risks of health and safety of Fragrance Oil's employees, in particular its operations personnel as well as the breakdown and health and safety of its suppliers' workers.

Fragrance Oils addresses the risk of its own employees' health and safety by a variety of measures including social distancing, providing personal protective equipment, asking employees to work from home where possible and proposing additional measures for mental and emotional well-being.

Regarding the risk of a breakdown of the supply chains and the health and safety of the suppliers' workers, being part of the essential supply chain, Fragrance Oils supports suppliers chiefly by continuing to order with essentially the same order and payment pattern as before the crisis.

## **Our Performance Indicators**

We will know the effectiveness of the steps we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain when:

- No reports are received from employees
- Transparency on full traceability to the raw materials source is provided
- No mention of these issues in supplier due diligence or assessment reports
- No pushbacks or reporting received from supply chain when the Modern Slavery Questionnaire is shared

Fragrance oils is continuing to review its policies, procedures, risk assessments and performance indicators and will amend this statement when necessary.

Fragrance Oils will publish annually this statement, a link to which will be on the homepage of the Company Website.

## **Modern Slavery Statement for the Financial Year 2020/2021**

### **Approval for this statement**

This statement was approved by the Fragrance Oils Limited Board of Directors on 07 April 2021.

**Signed:** *Andy Stedman*  
**Andy Stedman**  
**Head of Fragrance Oils**

**Date:** April 2021

**Policy Review Date:**

**April 2022**

**Policy Date:**

**January 2016**