



Modern Slavery Policy

Doc No: EPOL 007 **Title:** Modern Slavery Policy

Issue Date: 10/10/2025 **Issue:** 2

Author: Jim Higgins

Authorised: Robert Fenton

1. Policy Statement

Modern slavery violates human rights and destroys communities. Modern slavery takes various forms such as compulsory and forced labour, servitude and human trafficking. **East Lancashire Chemical** is committed to acting in an ethical and transparent way and fully supports objectives to eradicate modern slavery and human trafficking in its business operations and in our supply chains in accordance with the Modern Slavery Act 2015.

East Lancashire Chemical expects the same high standards of its suppliers, contractors, sub-contractors, agency workers, seconded workers, volunteers, interns, agents, external consultants, third-party representatives, and any other parties with whom we do business. This policy applies to all persons working for **East Lancashire Chemical** or on our behalf in any capacity and at all levels. All **East Lancashire Chemical** employees and any other persons associated with us should read, understand and follow this policy.

This policy does not form part of any employee's contract of employment and is subject to amendment at any time.

2. Responsibilities

Our Board of Directors has overall responsibility for ensuring this policy complies with the company's legal and ethical obligations, and that all those under the company's control comply with it. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given regular training on it, and in regard to modern slavery in supply chains.

3. East Lancashire Chemical Employees

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

East Lancashire Chemical operates a whistle-blowing hotline which is available to all employees through which they can report any concerns or suspicions of modern slavery within our organisation or those of our suppliers.

4. Training and Communication

East Lancashire Chemical will communicate regularly to our members about the Modern Slavery Act, including definitions of slavery and human trafficking through training to



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increase awareness of modern slavery in the UK and to promote the processes should a case of slavery be suspected.

Recognising the risk that also exists in our supply chain, we work with our suppliers to support communications with their own employees regarding spotting and reporting signs of slavery in their own organisations.

5. Recruitment

The charging of recruitment fees to work is a common factor underpinning many aspects of modern slavery; **East Lancashire Chemical** explicitly forbids the payment of worker-paid recruitment fees both directly for its own employees and for those in its suppliers and partners' employment.

East Lancashire Chemical does not confiscate workers' original identification documents and prohibits the practice in our suppliers' organisations.

6. Spotting the Signs of Modern Slavery

Someone in slavery might:

- Appear to be under the control of someone else and reluctant to interact with others
- Not have personal identification on them
- Have few personal belongings, wear the same clothes every day, or wear unsuitable clothes for work
- Have limited social contact or contact with their family
- Be reluctant to talk to strangers or the authorities
- Appear frightened, withdrawn, or show signs of physical or psychological abuse
- Be dropped off and collected for work always in the same way, especially at unusual times (very early or late at night)
- Not know their home or work address
- Never seem to have any or much money, despite working long hours
- Repeat a story that you have heard elsewhere, as if they and others have been instructed to learn it

None of these indicators in isolation or combination can give complete certainty; sometimes it will be a case of acting on your instinct that something is not right. You do not need to be certain to report your concerns.



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7. Reporting

Employees and business partners are required to raise concerns about any issue or suspicion of modern slavery in our operations or supply chains as soon as possible. If a case of modern slavery is identified or suspected at **East Lancashire Chemical** or within its supply chain and life or health is not in immediate danger, it can be reported via the Gangmasters & Labour Abuse Authority in the following ways:

- Website: gla.gov.uk
- Telephone: 0800 432 0804
- Email: intelligence@gla.gov.uk
- If potential victims are in immediate danger, the standard **999** emergency number should be used.
- Non-emergency police number **101** is to be used if victims are not in immediate danger.

In all cases, incidents (including any conflicts or suspected conflicts with this policy) should also be reported as soon as possible to the **East Lancashire Chemical** member responsible for tackling Modern Slavery, **Hannah Bricknell**, by telephone 0115 932 5165, or email hannah@dripak.co.uk.

8. Remedial Action

We will take immediate, decisive action on any evidence which indicates modern slavery is taking place in our operations or supply chain.

East Lancashire Chemical will investigate any evidence of modern slavery and promptly report those details to clients where **East Lancashire Chemical** has agreed to do so, confirming the facts and being transparent and accountable in our reporting process.

9. Disclosure Protection

East Lancashire Chemical aims to encourage openness and will support anyone who raises genuine concerns under this policy, even if they turn out to be mistaken. **East Lancashire Chemical** is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that an actual or potential act of modern slavery in **East Lancashire Chemical's** business or at any level in its supply chain is, or may be, occurring or about to occur, has taken place, or may take place in the future.



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Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern.

10. Compliance

Any member who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct. **East Lancashire Chemical** may terminate the relationship with business partners, other individuals and organisations working on **East Lancashire Chemical's** behalf if they breach this policy.

Robert Fenton
Group Managing Director
10th October 2025