



UNGERER LIMITED

Slavery and Human Trafficking Statement

For the financial Year 2017 – 2018

End of Financial Year 31st October 2018

Prepared by: Dr Adrian P Gledhill

HSE & Regulatory Affairs Manager, Ungerer Ltd

**Ungerer Ltd (the 'Company' Modern Slavery and Human Trafficking Statement for the Financial
Year 2017 - 2018**

Introduction

Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks in our business and in the wider supply chain. All staff are expected to report concerns and management are expected to act upon them.

1. Structure & Supply Chains

Ungerer Ltd – Organisation and Structure

As a manufacturer, processor and trader of fragrance and flavour compounds, essential oils and aroma chemicals. Based in Chester, UK, Ungerer Ltd is a wholly owned UK subsidiary of Ungerer And Company. The Group has its head office in New Jersey, USA.

Ungerer Ltd has an annual turnover in excess of £36m.

Our Business

Ungerer Ltd is organised into three business units: Fragrances, Flavours, Essential oils and Aroma chemicals.

Our Supply Chains

Ungerer sources raw materials for all our business activities, Fragrances, Flavours, Essential Oils and Aroma chemicals globally.

2. Our Policies on Modern Slavery and Human Trafficking

Ungerer Ltd is committed to ensuring there is no modern slavery or human trafficking in our supply chains or in any other part of our business. Our Anti-slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

3. Due Diligence Processes for Slavery and Human Trafficking

- Ungerer Ltd will only purchase raw materials from established reputable sources. In order to identify and manage risks within the supply chain Ungerer has a supplier approval questionnaire which has been adapted to incorporate the requirements of the Modern Slavery Act 2015 by requesting assurances from our suppliers that they abide by the requirements of the Modern Slavery and Human Trafficking Act 2015.

4. Risk Assessment:

- We expect each entity in our supply chain to, at least, adopt a 'one-up' due diligence on the next link in the supply chain.
- Ungerer are a member of the SEDEX Group which has the objective of ensuring all companies within the SEDEX system comply with the ethical standards of the SEDEX code of conduct for ethical and responsible suppliers.
- Ungerer Ltd has a TACCP plan (Threat Analysis and Critical Control Point) which has been duly modified to incorporate the requirements of the Modern Slavery Act 2015.
- Ungerer Ltd has a Supplier Approval Questionnaire which has been duly modified to incorporate the requirements of the Modern Slavery Act 2015.

5. Training

- Ungerer Ltd will ensure all staff involved in the purchase of goods are aware of the requirements of the Modern Slavery Act 2015 and that due diligence is paid to ensuring all raw materials purchased are from reputable and known suppliers, manufacturers and trading organisations who have been made aware of, and abide by, the requirements of the Modern Slavery Act.
- All employees have a duty to raise any concerns they may have regarding any organisation within our global supply chain that may be operating outside of the Modern Slavery Act.
- All employees operating within the company who are responsible for purchasing materials from global suppliers will receive training in what the Modern Slavery Act entails, how to recognise where it may be occurring and what to do should they suspect there is evidence modern slavery may be occurring and to whom they must report any suspicions.
- Where suspicions regarding modern slavery are raised the company will conduct an immediate investigation to establish the validity of any suspicions. This may involve sending out further supplier questionnaires, telephone interviews, company audits – this list is not exhaustive.
- Ungerer Ltd will have zero tolerance to slavery and human trafficking. Where there is evidence to suggest a supplier is operating outside the requirements of the Modern Slavery Act the Company will cease to trade with that organisation immediately until such time as substantive proof is obtained to demonstrate the supplier is not employing slavery or child labour as stipulated within the Modern Slavery Act.
- Where any supplier cannot or will not demonstrate compliance with the Modern Slavery Act Ungerer Ltd will cease to purchase from that company and will remove the company from our Approved Supplier List.

6. Monitoring of the Policy

The following key performance indicators (KPI's) will be used to measure how effective we have been to ensure slavery and human trafficking is not taking place in any part of our business or supply chains:

- Buyers reports visits to suppliers.
- Adherence to supplier approval processes.
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This statement is made pursuant to section 54(1) of the modern slavery Act 2015 and constitutes Ungerer Ltd's slavery and human trafficking statement for the financial year 2017 – 2018.

Mr John Percy, Managing Director

Ungerer Ltd

21st February 2019