

**Slavery and Human Trafficking Statement of TCE Group Limited & its subsidiaries for the Financial
Year ending 31 March 2018**

The UK Modern Slavery Act 2015 required certain businesses to publish a statement setting out the steps taken in the previous financial year to ensure that slavery and human trafficking is not taking place in their supply chains or own business.

TCE Group Limited and certain of its subsidiaries are obliged to publish such a statement. TCE Group Limited, as parent company, is publishing this statement on behalf of itself and its relevant subsidiaries, more specifically Tata Chemicals Europe Limited, British Salt Limited and Winnington CHP Limited (the “TCE Group”).

ORGANISATION'S STRUCTURE

We are a manufacturer in the chemicals sector, producing sodium carbonate, salt and sodium bicarbonate and other products. We are a part of the global Tata Chemicals group and our ultimate parent company is Tata Chemicals Limited in India. The TCE Group has all its operations in the UK, with its head office in Northwich, Cheshire, and employs over 380 people.

OUR VALUES

The commitment of the TCE Group to ethical business practices is at the heart of our Values. These Values are enshrined in the Tata Code of Conduct. We are committed to behaving in an open and transparent way, operating within the law in all of our business dealings and ensuring that all who work with us, in whatever capacity, join us in this approach.

OUR POLICIES ON SLAVERY & HUMAN TRAFFICKING

We are committed to ensuring that there is no slavery and human trafficking in our supply chains or in any part of our business. The Tata Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships. One of the key principles in the Tata Code of Conduct is to respect the human rights and dignity of all our stakeholders. The Tata Code of Conduct can be found in full at www.tatachemicaleurope.com/csr/ethical-business.

We are committed to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

PEOPLE IN OUR BUSINESS

As a responsible employer we have constructive processes to engage with potential employees and the community it operates in. All TCE Group employees are recruited in accordance with clear HR procedures designed to comply with local legislation, including checks for eligibility to work in the UK, references, proof of NI (UK) and bank details. This ensures each person is acting in their own right. We also ensure compliance with national living wage requirements.

TCE Group supplements its internal resources from time to time with support from third party services. The use of temporary agency workers is undertaken to provide the flexibility to react and support operating requirements where demand requires.

We currently have a master vendor agreement with a specialist recruitment agency, which has been appointed as preferred supplier in accordance with our procurement processes, including second tier agencies available for specialist recruitment.

The main employment agency implements a critical path process for all permanent and temporary staff and provides ongoing management for temporary staff, in addition to the in house specific induction processes and training. The agency is required to check workers are eligible for work (including relevant minimum age checks and eligibility checks to work in the UK).

All employees are required to fulfil a compulsory training module on the Tata Code of Conduct as part of their induction. This is outlined during the Company induction. We also have a clear and systematic whistleblowing procedure and grievance procedure for employees to raise concerns. This is signposted comprehensively around our business and sites.

We have recently rolled out a new compulsory online training module to ensure that all employees understand the role that they must play in combatting slavery and human trafficking. We are now developing a more targeted training module for our procurement and HR departments.

OUR SUPPLY CHAINS

The TCE Group spends over £80 million each year on goods, services and raw materials to support its chemical manufacturing and distribution operations.

To meet business needs, procurement are responsible for managing and continuously improving our procedures relating to supplier selection, qualification, compliance, performance and development. These procedures include all aspects of technical capability, sustainability, QSHE and ethical and regulatory compliance with a focus on continuous improvement, innovation and sustainable procurement with the aim to exceed our customer expectations.

Responsible Procurement

Our procurement department follow stringent procurement procedures to ensure the integrity of all our suppliers.

We require our employees to take appropriate steps to ensure that suppliers understand the ethical standards operated by the TCE Group and operate to the same or similar standards.

We have recently implemented a Responsible Procurement Policy to further embed and publicise the core principles to which our suppliers must adhere, based on the Tata Code of Conduct and our Values. These core principles are:

Integrity – to act fairly, honestly, ethically and transparent in our conduct always and in all our dealings throughout the supply chain. The Tata Code of Conduct outlines the ethical standards and fair business practices that the TCE Group operates to and we expect the same of our suppliers.

Excellence – to be passionate about achieving the highest standards of quality and continuous improvement always promoting meritocracy.

Health & Safety – not to compromise safety in the pursuit of Business Excellence and Commercial Advantage. The TCE Group is committed to the continuous education, monitoring, reporting and improving of all activities and environments in which we operate to ensure the highest levels of safeguarding are operating to protect our workforce.

Human Rights & Corporate Social Responsibility – The TCE Group is committed to integrating environmental, social and ethical principles into its core business with a zero tolerance approach to discrimination, bribery and corruption. Our drive is to achieve sustainable development and procurement within our supply chains that impact beyond compliance to local and international laws and regulations. Delivering benefits to the local and global communities through stronger partnerships that deliver value through longer term relationships, community projects, volunteering and raising awareness of the UN guiding principles focussing on the protection and betterment of human rights.

Slavery and human trafficking abuses come under the category of human rights.

Our Responsible Procurement Policy will be issued to all suppliers in 2018, following which access to this policy will be available on our website with the Tata Code of Conduct.

Our standard purchasing terms require our suppliers to comply with all applicable laws and regulations. In order to emphasise the modern slavery and human trafficking legislation, we are updating our standard purchasing terms to make specific reference to this legislation, including a reporting requirement and a requirement to provide suitable training to their own employees and contractors.

Identifying concerns

We have renewed our pre-qualification procedures which consist of an evaluation of a supplier's business and financial stability, technical capability, quality, H&S and Environmental performance, relevant industry and regulatory accreditations together with a CSR section relating to modern slavery, labour and human rights, discrimination, bribery and corruption.

In addition to the pre-qualification procedures, we carry out audits both on an ad hoc basis of current suppliers and all new critical to quality suppliers.

We have commenced a new initiative to confront the challenge of modern slavery and human trafficking more specifically. This entails the introduction of a risk based approach to identify the

potential high risk areas in our supply chain. We have drawn on various sources of data including UN and ILO to allow us to focus on defined areas of risk by country and industry sector.

Where we source products or equipment from countries and industries identified as potentially high risk we have initiated further investigation to establish the potential areas of risk relating to Modern Slavery, Child Labour and any Human Rights abuses.

Most of our raw materials and other purchases come from non-agriculture/non-retail UK manufacturing sectors which are considered low risk.

For companies operating in regions recognised as having a high human rights abuse risk, or operating in sectors identified as being high risk for human rights abuse we will require that our suppliers adopt suitable and robust policies and procedures to prevent human rights abuses. Relevant accreditations or audits relating to a relevant ethical standards which may be used as supporting evidence of compliance. Otherwise further investigation and potential remediation steps will be pursued. This will form the basis of additions to our standard prequalification process going forward.

Reporting concerns

In addition to our own internal processes and reviews, suppliers and employees are encouraged to use our confidential reporting system, InTouch, to report any concerns they may have. InTouch is a leading independent whistleblowing hotline provider, with a confidential service called “SpeakUp” that has been adopted by organisations of every size in over 100 countries. We will also be communicating to both employees and suppliers of how to report any suspected modern slavery or human trafficking abuses.

We have initiated an awareness campaign across the organisation by use of the Stronger Together tools and posters together with our own Whistleblowing materials.

NEXT STEPS

As described above, we will be implementing the following steps to review the effectiveness of our assessments in our supply chain to identify the potential for slavery or human trafficking in our supply chains in order that we can take further steps to combat any modern slavery and human trafficking:

1. Ongoing assessments to identify areas of high risk of Human Rights abuses within our supply chain;
2. Further investigation of the policies and procedures in place with those suppliers that have been classified as falling into the potential high risk for Human Rights abuse.
3. Identify appropriate key performance indicators for reporting on progress of identification of Modern Slavery risks within our supply chain.
4. Roll out of a new Supplier Communications Platform that will allow us to communicate updates to our suppliers including training materials, policies and ‘whistleblowing’ procedures relating to Human Rights abuses as well as other aspects of our Responsible Procurement



TATA CHEMICALS EUROPE

Policy. This platform will allow us to monitor our reach across the supply base and the frequency of access to this information.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 March 2018.



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Dr Martin Ashcroft, Director

TCE Group Limited

Date: 16.11.2018