



2M Group Ltd: Modern Slavery Policy Statement
Financial Year May 2017 – April 2018

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 of 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.

EH 2 - Equal Opportunities at Work

EH 3 - Personnel Philosophy

EH 7 – Personnel Development
EH 21 – Disclosures in the Public Interest
EH 57 – Anti Slavery & Human Trafficking

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 3rd party employment agency for overseas employees, 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.

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

April 2019