



Slavery & Human Trafficking Statement

The Treatt Group ('Treatt' or the 'Group') is committed to ethical business practices and policies that protect workers from abuse and exploitation and to eliminating acts of modern slavery and human trafficking within our business and our supply chains. The Group acknowledges its responsibilities under the Modern Slavery Act 2015 in preventing modern slavery and ensuring transparency within the organisation and with suppliers of goods and services to the Group.

Our Business

Treatt is a manufacturer and supplier of a diverse and sustainable portfolio of natural ingredients for the beverage, flavour and fragrance industries. Our products and solutions range from ingredients for the flavour and fragrance industry such as essential oils, aroma chemicals and specialty products developed by Treatt, to functional ingredient ranges such as wellness and beverage specialties. We supply a diverse client portfolio including many leading flavour & fragrance manufacturers, as well as FMCG companies. Our products are found in a myriad of consumer goods worldwide, from beverages and food products to perfumery and household goods.

Our vast product portfolio requires us to source natural raw materials from all over the world, building relationships with our suppliers that range from large multi-national organisations to small producers and farmers, operating in very different conditions and facing a variety of challenges. We recognise that some countries within our supply chain may present an increased risk of modern slavery and human trafficking.

Our Policies

Treatt recognises that our people are fundamental to our business. Where we employ people, we meet the requirements defined by the [Ethical Trading Initiative Base Code](#) ('ETI Base Code') concerning best practice with regard to social accountability.

Treatt is a supplier member of SEDEX, the Supplier Ethical Data Exchange, which is a not-for-profit membership organisation dedicated to driving improvements in responsible and ethical business practices in global supply chains. They use a collaborative approach to help buyers and suppliers share and exchange data, helping improve management of social and environmental risks within our supply chain, and positively impact responsible sourcing. We are regularly audited by SEDEX on our policies, procedures and practices, giving our customers assurance that we meet the requirements of the ETI base code.

Integrity is important to us. All employees are aware that integrity is a key value at Treatt and we encourage our suppliers to apply the same principles. We recruit our people through direct advertising and only use reputable recruitment agencies for permanent and temporary employees, employed by Treatt; we rarely use agency staff, but if there is occasion to do so we ensure that those assigned to us are vetted. We are committed to ensuring that all our people receive fair remuneration for the job they perform. Our employment policies ensure that there are fair and transparent systems in place for staff to raise concerns and have access to a confidential whistleblowing process to assist them to speak up, should the need arise.

Our Supply Chain

As part of our due diligence process, all suppliers of our raw materials are required to complete a self-evaluation questionnaire, which not only evaluates their manufacturing systems and controls but also the facilities and contractual conditions they provide for their workers, access for their workers to a whistleblowing policy and their policies in respect modern slavery in their own organisation and within the supply chain. The answers provided in the self-evaluation questionnaire are used to determine their suitability as a supplier to Treatt. In addition to completing the questionnaire, they are required to provide their anti-slavery and whistleblowing policies. All

suppliers are required to resubmit the self-evaluation questionnaire every three years to ensure that they continue to be a supplier with whom we wish to work.

Treatt has a large number of suppliers located in over 45 countries; though it is impossible to audit them all we take a risk management approach to ethical procurement. The Group will not support or deal with any business knowingly involved in modern slavery or human trafficking.

Actions Taken During the Year

With initial training on anti-slavery and human trafficking having taken place in 2018, refresher training was undertaken during the financial year, with all staff required to watch a video highlighting the prevalence of modern slavery in the country in which they are employed and to confirm that they have read and understood our Anti-Slavery and Human Trafficking Policy. Additionally, all UK raw material buyers are working towards the Chartered Institute of Procurement & Supply (CIPS) qualifications, the syllabus for which covers ethical and responsible sourcing, and those buyers who are already members of the institute undertake an annual CIPS ethical test. These measures ensure that those responsible for buying our raw materials and dealing with suppliers are fully equipped with the knowledge and skills to assess the risks of modern slavery within the supply chain.

Certain sectors present a higher risk of modern slavery, and the construction industry is one of those. All contractors engaged by Treatt on the fit out of our new UK Headquarters, which is due for completion in 2022, have been required to sign contracts that include modern slavery provisions. These provisions require contractors to take appropriate steps to eliminate modern slavery and to provide a process for workers to express grievances or concerns without reprisal. They also give us the right to terminate contracts where there is involvement in conduct that contravenes anti-slavery legalisation.

In 2017 we introduced a [Supplier Code of Conduct](#) the 'Code', which includes, provisions in respect of modern slavery and human rights and requires that, as a minimum standard, suppliers comply with the requirements of the ETI Base Code. The Code, which is published on our website, forms part of the raw material supplier evaluation process and the approval of any new supplier will be subject to their acknowledgement that they materially comply with the provisions of the Code. During the year we have worked with several new raw material suppliers, who have been through our evaluation process and have signed our Supplier Code of Conduct.

During the year we became a buyer member of SEDEX, enabling us to create links to our suppliers to access their ethical and sustainability data and audit reports, so that we can monitor their compliance to SEDEX's standards, which are verified by independent SEDEX Members Ethical Trade Audits (SMETA 4-pillar).

Membership as a buyer has enabled us to undertake a baseline assessment of the percentage of our suppliers that are SEDEX registered, which is 35%. During the coming year we will be working closely with our suppliers to encourage as many as possible to become members of SEDEX to increase the transparency of our supply chain and drive sustainable and ethical practices. Dealing with SEDEX members, or those registered with similar third-party organisations, gives us comfort that that our suppliers adhere to the same high ethical standards as Treatt, including in respect of modern slavery. We aim to increase the percentage of SEDEX suppliers within our supply chain.

Supplier visits are an important part of our procurement strategy, enabling us to gain a thorough understanding of the raw materials we purchase and to build sustainable supplier relationships. Additionally, they provide an opportunity to evaluate the integrity of our suppliers, enabling us to see how they operate and to assure ourselves that they respect human rights and run their businesses within an ethical framework, which is consistent with our values and our Supplier Code of Conduct. COVID-19 has prevented us visiting as many suppliers as we usually do during the year, with our teams being unable to travel internationally. In the 2020/21 financial year our team visited 45 suppliers within Florida and the UK. In addition, 102 supplier meetings were held, the majority of which were virtual due to the pandemic. These meetings enable us to develop closer relationships with our suppliers ensuring greater transparency.

Our Commitment

We are not aware of any slavery or human trafficking taking place in our business or supply chain and we shall continue to apply appropriate due diligence to comply with the Modern Slavery Act.

This statement is made on behalf of Treatt Plc and its subsidiaries, R C Treatt & Co Limited and Treatt USA Inc, pursuant to s54(1) of the Modern Slavery Act 2015 for our financial year ended 30 September 2021. It has been approved by the Board of Treatt Plc and will be reviewed and updated annually.

A handwritten signature in black ink, appearing to read 'Tim Jones', with a long horizontal stroke extending to the right.

Tim Jones
Chairman

26 November 2021