



## 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 anti-slavery and human trafficking policy is accessible to all employees and training takes place as part of an employee's induction and again at two-year intervals.

### 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**

During the year we rolled out an updated supplier code of conduct (the 'Code') and a new responsible and sustainable sourcing policy to all our raw material suppliers, which include provisions in respect of modern slavery and human rights and require 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.

We have continued to work with suppliers as part of our responsible and sustainable sourcing policy, encouraging them to become members of SEDEX to ensure that they are audited and that we can access their ethical and sustainability data and audit reports. We have improved the percentage of our suppliers that are SEDEX registered from 35% last year to 46% at 30 September 2022. We will continue to encourage suppliers to register with SEDEX, or similar third-party organisations, which gives us comfort that that our suppliers adhere to the same high ethical standards as Treatt, including in respect of modern slavery.

Additionally, both our UK and US facilities were subject to independent SEDEX Members Ethical Trade Audits (SMETA 4-pillar) with only a number of minor non-conformances noted, which are in the process of being closed out.

We recognised that a comprehensive labour and human rights policy was required to define standards for all employees across the Group, covering a range of aspects from equality and diversity to harassment and working hours and this has been introduced.

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. In the 2021/22 financial year our team visited 22 suppliers, including a number of our citrus suppliers in South America. In addition, 71 supplier meetings were held, virtually or in person. These meetings enable us to develop closer relationships with our suppliers ensuring greater transparency.

Our raw material buyers are continuing to work 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. It is our goal to have the whole global procurement team CIPS qualified in 2023.

### **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 2022. 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 flourish extending to the right.

Tim Jones  
Chairman

25 November 2022