



UNGERER LIMITED

Modern Slavery and Human Trafficking Statement

For the Financial Year 2020 – 2021

End of Financial Year: 31st October 2021

Adrian Gledhill Ungerer Ltd

Modern Slavery and Human Trafficking Statement for the Financial Year 2020 - 2021

Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Ungerer Ltd has taken and is continuing to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Ungerer limited has a zero-tolerance approach to any form of modern slavery. Ungerer Limited will refrain from entering business, and/or will discontinue any current business with any other organisation which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour. We are committed to preventing slavery and human trafficking within our own business and in our supply chains and to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place.

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 UK subsidiary of Ungerer And Company Ltd. The Group is wholly owned by Givaudan.

Our Business

Ungerer Ltd is organised into four business units: Fragrances, Flavours, Essential oils, and Aroma chemicals. We manufacture solely at our site in Chester, United Kingdom.

Ungerer complies every day, in all business activities, with external laws and regulations as well as with our policies, practices, and procedures. We facilitate a culture where we can freely discuss and report ethical and legal issues.

Ungerer Limited, is part of a larger group Givaudan UK Limited, and Givaudan Holdings UK Limited who are a leading business in this sector. The below policies define Ungerer Limited's ethical behaviour standards and the principal anti-corruption rules that apply to our business.

Our Supply Chains

Ungerer Limited sources raw materials for all our business activities, Fragrances, Flavours, Essential Oils and Aroma chemicals globally. Ungerer participates in the Supplier Ethical Data Exchange ("SEDEX") whose goal is to drive improvements in ethical and responsible business



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practices. A core principle of SEDEX is to avoid unfair or unsafe labour practices including slavery and human trafficking.

Ungerer Limited believes its exposure to modern slavery to be limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business or the business of any organisation that supplies goods and/or services to it.

Regarding new suppliers, all new suppliers are asked due diligence questions to determine the steps that they take to eliminate slavery and human trafficking from their supply chain. This forms part of the evaluation criteria behind our selection of new suppliers.

Policies

Within Ungerer Limited, the Givaudan Principles of Conduct is a governing charter for ethical behaviour including:

- **Legal and Ethical Dealings provisions.** Ungerer Limited believes in compliance with all laws and policies that apply to our business in the countries in which we operate. We are committed to and adhere to the highest ethical standards in all business dealings.
- **Responsible Corporate Citizenship provisions.** Ungerer Limited is committed to respect for human rights wherever we do business and in all communities in which we are present. We believe in fair employment standards and do not tolerate or practice any form of child exploitation or forced labour or engage with suppliers who do not adhere to a strict anti-slavery policy.
- **Disclosure and Transparency Policy.** We encourage all our employees, contractors and workers to come forward with any concerns regarding how colleagues are being treated, practices within our business or supply chain or any violations against any policy operated by us without fear of retaliation or reprisal. If our employees do not feel comfortable contacting their local compliance officer or legal department, they are encouraged to use the Givaudan Compliance Helpline which is confidential and operated in every Company language.

In addition to the Principles of Conduct, Givaudan has further policies and procedures applying for all its entities including Ungerer Limited, including:

- **Givaudan Human Rights Policy:** Givaudan has made an explicit commitment to respect human rights, including labour rights, as outlined in our Group-wide Principles of Conduct and in accordance with the UN Guiding Principles for Business and Human Rights. Respect for human rights is an essential guide to the right way of doing business and to living our purpose. A commitment to high



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ethical standards, as well as transparency and honesty in our dealings with employees, customers, suppliers and the communities where we operate, enables us to be a responsible corporate citizen.

- **Responsible Sourcing Policy.** This policy outlines health and safety, social, environment and business integrity principles we require all our suppliers and service providers to acknowledge.
- **Position Statement on Social Responsibility:** At Givaudan, social responsibility is deeply ingrained in our corporate culture. For Givaudan this entails going beyond financial due-diligence and establishing leading ethics, social and environmental practices at our sites and areas of operations. We consider this as a basic license to operate our business, and use it as an effective tool to engage with our stakeholders.
- **Global Anti-Bribery, Gifts, Entertainment and Hospitality Policy.** This Policy sets out Givaudan's ethical behaviour standards and the principal anti-corruption rules that apply to our business.

Givaudan is also a signatory to the United Nations Global Compact ("UNGC") which includes principles in the areas of human rights, labour and anti-corruption.

Training

Upon commencement of employment, all employees undergo a structured induction process. All employees are made aware of the Ungerer Limited and Givaudan policies relating to the required standards of behaviour. Ungerer Limited will continue to provide training on awareness of modern slavery to those within the business who have been identified as having responsibilities in this regard, namely those involved in purchasing and selling.

Our Performance Indicators

We will know the effectiveness of the steps we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain when:

- No reports are received from employees
- Transparency on full traceability to the raw materials source is provided
- No mention of these issues in supplier due diligence or assessment reports
- No push backs or reporting received from supply chain when the Modern Slavery Questionnaire is shared



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Covid-19:

Ungerer Limited is performing regular risk reviews to assess the impact of the Covid-19 pandemic on its strategy, operations, and supply chains. This risk assessment is reviewed by Ungerer Limited company manager at regular intervals.

Among the risks identified and managed are the risks of health and safety of Ungerer Limited's employees, in particular its operations personnel as well as the breakdown and health and safety of its suppliers' workers.

Ungerer Limited addresses the risk of its own employees' health and safety by a variety of measures including social distancing, providing personal protective equipment, asking employees to work from home where possible and proposing additional measures for mental and emotional well-being.

Regarding the risk of a breakdown of the supply chains and the health and safety of the suppliers' workers, being part of the essential supply chain, Ungerer Limited supports suppliers chiefly by continuing to order with essentially the same order and payment pattern as before the crisis.

Approval for this statement approved by company management:

Name: Dr Adrian Gledhill Position: Company Manager – Ungerer Limited

Signature: _____

Date: _____

31/8/21