



Kilfrost Group Limited and Subsidiaries

Modern Slavery and Human Trafficking Statement for the Financial Year ending 31 March 2019

Kilfrost Group Limited acknowledges and welcomes the Modern Slavery Act 2015 and the duty it places on large organisations to disclose publicly the steps they are taking to prevent modern slavery within business and their supply chains. Kilfrost Group Limited has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity around this important issue. This statement sets out Kilfrost Group Limited's actions to understand all potential modern slavery risks related to our business and the steps we have taken to ensure that there is no known slavery or human trafficking within our own business and associated supply chains.

Company Structure

Kilfrost is a privately-owned limited company with less than 50 employees worldwide. The Company is primarily engaged in the development, manufacture and supply of de/anti-icing and heat transfer fluids within the UK, with a subsidiary entity in the Americas. The Company does not currently manufacture any products outside the UK. The Company uses supply chain partners for both goods and services to fulfil orders which are predominantly UK or European based. Sub-contractors are used for delivery purposes. As a specialist chemical manufacturer, we consider the risk of Modern Slavery existing within our business to be low.

Due Diligence

We:

- Operate strict procurement processes, ensuring suppliers comply with all applicable standards including those which relate to the Modern Slavery Act;
- Expect our suppliers to have suitable anti-slavery and human trafficking policies and processes in place within their own businesses and to cascade those policies to their own suppliers;
- Have added a specific item relating to the Modern Slavery Act to the Kilfrost Supplier Assessment Questionnaire and to the agenda of contract management meetings with suppliers;
- Provide communications in respect of the Modern Slavery Act to all staff members and reaffirm the importance of our whistle blowing policy;
- Encourage staff to identify and report any potential breaches of Kilfrost Group Limited's anti-slavery policy statement to their relevant Head of Department;
- Ensure whistle blowers are protected through our confidential reporting process.

Where issues are identified that are not resolved to our satisfaction, we review the on-going nature of the relationship with that relevant organisation.

Relevant Company Policies

Our Modern Slavery Policy Statement reflects our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to prevent

slavery and human trafficking in our supply chains. As stated above, the Company adopts many procedures that assist with our management of potential modern slavery and human trafficking issues.

- Whistleblowing Policy - encourages all its workers, clients and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. The Company's whistleblowing procedure is designed to make it easy for workers, clients or others to make disclosures, without fear of retaliation.
- Anti-Bribery Policy – details the Company's procedures and controls on Company employees giving or accepting inducements which may influence a decision in the course of business.
- Purchasing Policy – states the organisations commitment to dealing fairly, evenly and professionally with our suppliers and directly addresses supplier compliance with the Modern Slavery Act.

Moving forward

In addition to formal communications, posters and flyers will be distributed to office and site notice boards, these will include:

- The principles of the Modern Slavery Act 2015.
- What to do if they have a potential modern slavery or human trafficking issue.
- Details of the Modern Slavery Helpline (0800 0121 700).

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 and constitutes Kilfrost Group Limited's modern slavery and human trafficking statement for the financial year ending 31 March 2019.

Further Information

Full Act

http://www.legislation.gov.uk/ukpga/2015/30/pdfs/ukpga_20150030_en.pdf

Slavery and Human Trafficking in Supply Chains Practical Guidance

<https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide>

Modern Slavery Website <https://www.gov.uk/government/collections/modern-slavery>



Gary Lydiate, CEO