



PMD CHEMICALS LTD (PMD) is committed to preventing modern slavery and human trafficking in every part of its business and supply chain.

In accordance with the Modern Slavery Act 2015, PMD is required to prepare a slavery and human trafficking statement for each financial year. The statement sets out all potential modern slavery risks related to its business and the steps it has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains or in any part of its own business.

About PMD CHEMICALS LTD

PMD is a privately owned company supplying chemical processes in to the electronics and general metal finishing industries.

PMD operates within the United Kingdom with overseas distributors.

PMD's commitment to the principles of The Modern Slavery Act 2015

PMD recognises that it has a responsibility to take a robust approach to modern slavery and human trafficking. As an equal-opportunities employer, PMD is committed to creating and ensuring a non-discriminatory and respectful working environment for all its staff.

PMD's policies and manuals

PMD operates the following policies and manuals that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

PMD's recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the United Kingdom and to safeguard employees from any abuse, coercion or exploitation.

The following policies/manuals are accessible to all staff:

Modern Slavery and Human Trafficking Standard

The Modern Slavery and Human Trafficking Standard sets out the minimum acceptable levels of behaviour required of all staff, as well as setting out the activities that will be undertaken to identify and address the risk of modern slavery within PMD and its supply chains.

PMD Whistleblowing Policy

The PMD Whistleblowing Policy is communicated to employees during their site induction. The intention of the policy is to outline the process for employees to report instances of corruption, malpractice, criminal behaviour and failure to deliver proper standards of service, where confidentiality is required. This policy is integral in preventing occurrences of modern slavery and human trafficking by providing an avenue whereby any suspected instance can be reported without fear of repercussions.

The whistleblowing facility is always available to employees and any implications in terms of modern slavery can be brought to attention by any employee anytime. PMD encourages all workers to report any concerns related to the direct activities, or the supply chains of the organisation. The Safecall helpline is also available should anyone require an alternative way to report their concerns.

NDA Supply Chain Charter

The NDA Supply Chain Charter sets out expectations placed on the supply chain, including the prevention and elimination of modern slavery and human trafficking in their organisations and supply chains. PMD is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. PMD will work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

Conditions of Employment Manual

The Conditions of Employment Manual establishes conditions, processes, protocols, rights and responsibilities governing the employment of all employees. This extends to equal opportunities, pay, working hours, training and development, conduct and discipline and employee relations. This forms part of the contract of employment between PMD and its employees. The establishment of regulated working practices alongside standards to be upheld ensures the just and fair treatment of all employees.

PMD Professionalism - Standards and Expectations

PMD makes it clear to employees the actions and behaviours expected of them when representing the organisation. The PMD Employment Manual puts forward standards which are applicable to the conduct and work of employees. This includes, but is not limited to, competence, reporting, personal responsibility, procedural use and adherence and equality, diversity and inclusion. Upholding these standards within the workplace is essential in ensuring the correct treatment of workers as well as the workers themselves maintaining the highest standards of conduct and ethical behaviour, whether operating at home, abroad or in managing the supply chain.

Equal Opportunities Policy

The Equal Opportunities policy documents PMD's commitment to providing equal opportunity for employment, advancement and equitable treatment, whilst outlining the responsibilities of employees and their managers to avoid and report instances of

harassment. PMD's commitment to overcoming any barriers to equal opportunity and complying with its obligations is emphasised and this helps to ensure the fair and equitable treatment of all employees by providing a consistent approach to developing the skills and attributes of all employees whilst valuing their respective abilities.

Dignity at Work Policy

The Dignity at Work Policy covers harassment of, and by, all workers engaged to work for PMD: this includes PMD employees, contractors, agency workers or anyone working in any other capacity on behalf of PMD. This policy provides recourse to the disciplinary procedure where an instance of harassment or other occurrence of indecent treatment of an employee occurs. Moreover, the policy sets an expectation of the obligation on employees to intervene in instances of harassment, if they feel able to do so, or at the very least report it immediately to a manager.

The Dignity at Work Policy has the effect of reducing, or curtailing, any forms of inhuman or degrading treatment in the workplace, not only by those employed PMD but also any person onsite and is therefore also compliant with Articles 3 and 4 of the European Convention on Human Rights.

Resource Management

The Resource Management Map provides an illustration of the route or process to be followed when assigning a surplus or shortfall in manning. This includes planning, assignment and review.

The PMD supply chain

PMD is committed to preventing slavery and human trafficking in all its corporate activities. This can be achieved by ensuring that the supply chain PMD engages with is free from slavery and human trafficking. Our organisation uses an extensive supply chain to procure goods and services, which is conducted in alignment with our Commercial Services Manual.

Risk to PMD

Labour exploitation within the tiers of PMD's supply chain is the predominant risk of modern slavery to PMD. This risk exists within the supply chain if appropriate monitoring and checks are not undertaken and this is especially true in the case of goods sourced from elsewhere. Items of particular susceptibility are basic and raw materials, such as personal protective equipment and components used in manufacture. It is important therefore that PMD identifies, from its suppliers, precisely the origins of goods, to allow them to ascertain whether they are likely to increase PMD's risk exposure to modern slavery.

Effective action taken to address modern slavery

PMD will undertake the following activities to address modern slavery risks:

- Development and roll out of ethics training to key staff in the organisation and in doing so drawing particular attention to the need to develop positive action in terms of a strong reporting culture and encouraging the use of the whistleblowing facility

- Address whether there are modern slavery risks during the contract strategy stage
- Continue to promote staff awareness of the Modern Slavery Act 2015 and inform them of the appropriate action to take if they suspect a case of slavery or human trafficking.
- Continue to engage with its supply chain to obtain evidence of the controls in place within their organisations to eradicate modern slavery and human trafficking, including looking at the lower tiers of their supply chains
- Continue with compliance checks as part of the new supplier registration process. This requires suppliers to provide evidence of compliance with relevant legislative, safety, health, environment and quality principles and procedures, where appropriate, before being eligible to provide goods/services to PMD
- Undertake retrospective checks on key existing suppliers to ensure they comply with the requirements of the new supplier process. Where these suppliers fail to do so then engagement shall be required to promote compliance on their part
- PMD will work with key suppliers to ensure progress is being made towards becoming real living wage employers, as set by the Living Wage Foundation

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes PMD's slavery and human trafficking statement for the financial year ending 31 March 2023.

This statement was approved by the PMD Board on the 28 February 2022.

Graham Pemberton Managing Director

28 February 2022