

Modern Slavery Act Transparency Statement

Introduction

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 and sets out the measures Thomas Swan & Co. Ltd. has taken to ensure compliance with the above Act.

Thomas Swan & Co. Ltd. is committed to ensuring that all its business operations are free from involvement with slavery or human trafficking. With sustainability firmly embedded in our company's culture and strategy, we strive to continually improve in this important area.

Thomas Swan company vision and strategy

Our Purpose

To inspire and deliver creative and sustainable chemistry.

Our Vision

A pioneering, globally recognised, sustainable manufacturer of speciality chemicals.

Our Mission

We will invest in sustainable, innovative technologies and practices, our people and operational excellence to deliver growth in strategically targeted markets together with exceptional customer service.

Our Values

Integrity

We always strive to do the right thing

Innovation

We have the courage to pursue new ideas

Respect

We treat everyone with respect

Teamwork

We are more successful by working together

Excellence

We strive for excellence in everything we do

Strategic Priorities

Develop our people

Operational excellence across all departments

Embrace sustainability in all that we do

Strategically target markets

Innovation driven culture

Company structure and business operations

Founded in 1926, Thomas Swan & Co. Ltd. is a UK-based independent manufacturer of performance and speciality chemicals. The company turned over £36m in 2018/19, has approximately 180 employees and is organised into three divisions: Performance Chemicals, Custom Manufacture and Advanced Materials. The company's products are sold into the following global market sectors: tyres and rubber, personal care and hygiene, inks and coatings and speciality chemicals.

Supply chains

Offices in the UK, USA and China allow the company to reach a global market. Supply chain and logistics are mostly managed centrally from the UK, with the majority of supplies sourced from Europe.

In keeping with the company's commitment to sustainability, Thomas Swan appointed EcoVadis to independently assess the company's performance in this area. The company achieved gold status for the third year running in 2019 with a score of 71%, which again placed Thomas Swan in the top 2% of all companies assessed by EcoVadis.

In 2019, Thomas Swan decided to use EcoVadis to assess the sustainability performance of its supply chain in order to encourage its suppliers to adopt more sustainable practices. The top 20 suppliers of goods and materials to Thomas Swan were asked to join EcoVadis, if they had not already done so, and connect with us to make their sustainable procurement performance visible to Thomas Swan. A total of 17 of the 20 contacted cooperated with this request.

In 2020, we are expanding our scope to include all our suppliers. Furthermore, a new Sustainable Procurement Policy has been adopted by the company and shared with all our suppliers.

Our policies in relation to slavery and human trafficking

Thomas Swan operates in accordance with strong values, as shown above. These values, such as 'Integrity', are built into the culture of the company and drive us to ensure that our supply chain is free from any instances of slavery or human trafficking.

Policies already in place include the following:

- Modern Slavery Policy
- Anti-Corruption and Bribery Policy
- Fair Competition Policy
- The ETI (Ethical Trading Initiative) Policy
- Equal Opportunities Policy
- Sustainable Procurement Policy

Due diligence

The company carries out an annual sustainability audit as part of the due diligence process.

An assessment of current procurement patterns shows that over 90% of raw materials are sourced from the UK or the EU.

UK sourced: 62%

Rest of the EU: 30%

China: 8%

The company's investment in the EcoVadis sustainable procurement platform should help secure further improvements in our supply chain. This system will help us to ensure our suppliers are aware of slavery and human trafficking in their own supply chains and drive improvements where necessary.

Identification of a risk of slavery or human trafficking in the supply chain

No instances of slavery or human trafficking are known in our supply chain. If any arise from the assessment currently under way by EcoVadis, these will be investigated and handled appropriately at the time with a zero-tolerance approach.

Measuring the effectiveness of systems in place

The company's annual sustainability audit will include an assessment of the effectiveness of the EcoVadis system in detecting potential slavery or human trafficking.

The EcoVadis supplier CSR assessment covers Labour and Human Rights as one of the four key themes in its methodology. This evaluates policies and actions implemented by suppliers to enforce compliance with internationally recognised human rights standards and frameworks related to slavery and human trafficking. Suppliers provide information regarding their policies and actions through sector specific questionnaires, which cover human rights due diligence and certification schemes used to verify that products are manufactured under fair labour practices. EcoVadis questionnaires also ask suppliers to disclose information about their sustainable procurement selection criteria, third party audits and supplier capacity building, thus providing buyers with higher visibility of their upstream suppliers' efforts to prevent slavery and human trafficking.

The EcoVadis scorecard will identify when companies get a low score on the Labour & Human Rights theme. If corrective actions are not implemented, proportionate actions will be considered against those suppliers on an individual basis. In the case of very low scores or if the supplier is unwilling to engage in improvements, termination of the commercial relationship may result.

Training

Training on the subject of slavery and human trafficking will be provided to all relevant employees. The Modern Slavery Policy has been publicised and made available to all employees.

Approval

This Modern Slavery Act Transparency Statement was approved by the Chemical Business Board of Thomas Swan & Co. Ltd. and signed by the Chief Executive Officer, Mr. Harry Swan.



Harry Swan
CEO

18th August 2020