

SLAVERY AND HUMAN TRAFFICKING POLICY

Introduction

This policy sets out Fuchs Lubricants (UK) plc actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. We recognise that we have a responsibility to take a robust approach to slavery and human trafficking and are absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking.

Organisational Structure and Supply Chains

This statement covers the activities of Fuchs Lubricants (UK) plc:-

Fuchs Lubricants UK plc, a wholly owned subsidiary of the International Fuchs Group headquartered in Mannheim, Germany, who manufactures and distributes specialist lubricants to automotive suppliers, OEM, mining and exploration, metalworking, agriculture and forestry, aerospace, power generation, process engineering, construction and transport, as well as the steel, metal and cement industries, the food industry, pharmaceutical and cosmetics, the glass production sector and the casting and forging industry.

The organisation currently supplies lubricants Worldwide

Our Supply Chains

Our supply chain includes the sourcing of raw materials, finished products and packaging materials related to the provision of lubricants.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our internet based Fuchs compliance communications system, Anti-bribery and Anti-Corruption Policies and Code of Conduct and Social Responsibility Policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Relevant Policies & Procedures

We operate the following relevant policies that describe our approach to conducting business generally and the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:-

- **Compliance Management System**

We encourage our employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our compliance management system is designed to make it easy for employees to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our confidential helpline/complete our confidential disclosure form available on the website.

- **Employee Code of Conduct & Corporate Social Responsibility Policy**

This policy makes clear to employees the actions and behaviour expected of them when representing the organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when representing the company and managing its supply chain.

- **Anti-bribery & Anti-Corruption Policies**

We are committed to the highest standards of ethical conduct and integrity in our business activities in the UK and Overseas. This policy outlines our position on preventing and prohibiting any form of bribery or corruption.

- **Supplier Code of Conduct**

We are committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

- **Recruitment/Agency Workers Policy**

We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency used before accepting workers from that agency.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, all Directors, Management and HR Staff have received this policy.

Responsibility

Responsibility for the anti-slavery initiatives are:

- **Personnel Department** Responsible for putting in place and reviewing policies, for training and temporary manpower agency assessment.
- **Compliance Department:** Responsible for ensuring that Fuchs' suppliers operate in accordance with relevant policies.

Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk:-

- Where possible we build long standing relationships with our suppliers and expect these entities to have suitable anti-slavery and human trafficking policies and processes and make clear our expectations.
- We operate a supplier approval process to ensure our supply chain has suitable anti-slavery and human trafficking policies and processes in place. We expect each supplier to adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain.
- Our policy is to employ staff on a direct basis with only an average of 2% temporary employees from approved agencies.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the 2016 financial year



Richard Halhead
Managing Director
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