

Slavery and Human Trafficking Statement of Tata Chemicals Europe Holdings Limited & its subsidiaries for the Financial Year ending 31 March 2016

The UK Modern Slavery Act 2015 required certain businesses to publish a statement setting out the steps taken in the previous financial year to ensure that slavery and human trafficking is not taking place in their supply chains or own business.

Tata Chemicals Europe Holdings Limited and certain of its subsidiaries are obliged to publish such a statement. Tata Chemicals Europe Holdings Limited, as parent company, is publishing this statement on behalf of itself and its relevant subsidiaries, more specifically Tata Chemicals Europe Limited, British Salt Limited and Winnington CHP Limited (the “**Tata Chemicals Europe Group**”).

ORGANISATION'S STRUCTURE

We are a manufacturer in the chemicals sector, producing sodium carbonate, salt and sodium bicarbonate and other products. We are a part of the global Tata Chemicals group and our ultimate parent company is Tata Chemicals Limited in India. The Tata Chemicals Europe Group has all its operations in the UK, with its head office in Northwich, Cheshire, and employs over 380 people.

OUR VALUES

The commitment of the Tata Chemicals Europe Group to ethical business practices is at the heart of our Values. These Values are the Tata Values of Unity, Responsibility, Excellence, Understanding and Integrity which are enshrined in the Tata Code of Conduct. We are committed to behaving in an open and transparent way, operating within the law in all of our business dealings and ensuring that all who work with us, in whatever capacity, join us in this approach.

OUR POLICIES ON SLAVERY & HUMAN TRAFFICKING

We are committed to ensuring that there is no slavery and human trafficking in our supply chains or in any part of our business. The Tata Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships. One of the key principles in the Tata Code of Conduct is to respect the human rights and dignity of all our stakeholders. The Tata Code of Conduct can be found in full at www.tatachemicals.com.

We are committed to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

PEOPLE IN OUR BUSINESS

As a responsible employer we have constructive processes to engage with potential employees and the community it operates in. All Tata Chemicals Europe employees are recruited in accordance with clear HR procedures designed to comply with local legislation, including checks for eligibility to work in the UK, references, proof of NI (UK) and bank details. This ensures each person is acting in their own right. We also ensure compliance with national living wage requirements.

Tata Chemicals Europe supplements its internal resources from time to time with support from third party services. The use of temporary agency workers is undertaken to provide the flexibility to react and support operating requirements where demand requires.

We currently have a master vendor agreement with a specialist recruitment agency, which has been appointed as preferred supplier in accordance with our procurement processes, including second tier agencies available for specialist recruitment.

The main employment agency implements a critical path process for all permanent and temporary staff and provides ongoing management for temporary staff, in addition to the in house specific induction processes and training. The agency is required to check workers are eligible for work (including relevant minimum age checks and eligibility checks to work in the UK).

All employees are required to fulfil a compulsory training module on the Tata Code of Conduct as part of their induction. This is outlined during the Company induction. We also have a clear and systematic whistleblowing procedure and grievance procedure for employees to raise concerns. This is signposted comprehensively around our business and sites.

We are currently developing a new compulsory training module to ensure that employees understand the role that they must play in combatting slavery and human trafficking. This will be rolled out to employees in procurement and HR departments in the first instance and ultimately to all employees.

OUR SUPPLY CHAINS

The Tata Chemicals Europe Group spends over £80 million each year on goods, services and raw materials to support its chemical manufacturing and distribution operations.

To meet business needs, procurement are responsible for managing and continuously improving our procedures relating to supplier selection, qualification, compliance, performance and development. These procedures include all aspects of technical capability, sustainability, QSHE and ethical and regulatory compliance with a focus on continuous improvement, innovation and sustainable procurement with the aim to exceed our customer expectations.

Responsible Procurement

Our procurement department follow stringent procurement procedures to ensure the integrity of all our suppliers.

We require our employees to take appropriate steps to ensure that suppliers understand the ethical standards operated by the Tata Chemicals Europe Group and operate to the same or similar standards.

We are currently developing a formal Responsible Procurement Policy to further embed and publicise the core principles to which our suppliers must adhere, based on the Tata Code of Conduct and our Values. These core principles are:



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Integrity – to act fairly, honestly, ethically and transparent in our conduct always and in all our dealings throughout the supply chain. The Tata Code of Conduct outlines the ethical standards and fair business practices that the Tata Chemicals Europe Group operates to and we expect the same of our suppliers.

Excellence – to be passionate about achieving the highest standards of quality and continuous improvement always promoting meritocracy.

Health & Safety – not to compromise safety in the pursuit of Business Excellence and Commercial Advantage. The Tata Chemicals Europe Group is committed to the continuous education, monitoring, reporting and improving of all activities and environments in which we operate to ensure the highest levels of safeguarding are operating to protect our workforce.

Human Rights & Corporate Social Responsibility – The Tata Chemicals Europe Group is committed to integrating environmental, social and ethical principles into its core business with a zero tolerance approach to discrimination, bribery and corruption. Our drive is to achieve sustainable development and procurement within our supply chains that impact beyond compliance to local and international laws and regulations. Delivering benefits to the local and global communities through stronger partnerships that deliver value through longer term relationships, community projects, volunteering and raising awareness of the UN guiding principles focussing on the protection and betterment of human rights.

Slavery and human trafficking abuses come under the category of human rights.

Our Responsible Procurement Policy will be issued to all suppliers in 2017, following which access to this policy will be available on our website with the Tata Code of Conduct.

Our standard purchasing terms require our suppliers to comply with all applicable laws and regulations. In order to emphasise the modern slavery and human trafficking legislation, we are currently updating our standard purchasing terms to make specific reference to this legislation, including a reporting requirement and a requirement to provide suitable training to their own employees and contractors.

Identifying concerns

Our pre-qualification procedures consist of an evaluation of a supplier's business and financial stability, technical capability, quality, H&S and Environmental performance, relevant industry and regulatory accreditations together with an ethical declaration relating to discrimination, bribery and corruption.

In addition to the pre-qualification procedures, we carry out audits both on an ad hoc basis of current suppliers and all new critical to quality suppliers.

We have commenced a new initiative to confront the challenge of modern slavery and human trafficking more specifically. This entails the introduction of a risk based approach to identify the

potential high risk areas in our supply chain. We will draw on UN and ILO sources of defined areas of risk by country and industry sector.

Using the new risk based approach we have initially identified some potential risks in the textile area of our supply chain with an example being packaging products sourced from India. This is an industry sector of our supply chain that will be investigated further.

Most of our raw materials and other purchases come from non-agriculture/non-retail UK manufacturing sectors which are considered low risk.

For companies operating in regions recognised as having a high human rights abuse risk, or operating in sectors identified as being high risk for human rights abuse we will require that our suppliers adopt suitable and robust policies and procedures to prevent human rights abuses. Relevant accreditations or assessments such as SA 8000 or Sedex SAQ's may be used as supporting evidence of compliance. Otherwise further investigation and potential remediation steps will be pursued. This will form the basis of additions to our standard prequalification process going forward.

Reporting concerns

In addition to our own internal processes and reviews, suppliers and employees are encouraged to use our confidential reporting system, InTouch, to report any concerns they may have. InTouch is a leading independent whistleblowing hotline provider, with a confidential service called "SpeakUp" that has been adopted by organisations of every size in over 100 countries. We will also be communicating to both employees and suppliers of how to report any suspected modern slavery or human trafficking abuses.

We will be raising awareness of the various reporting options to both employees and suppliers over the next year as part of our training initiatives in this area.

NEXT STEPS

As described above, we will be implementing the following steps to review the effectiveness of our assessments in our supply chain to identify the potential for slavery or human trafficking in our supply chains in order that we can take further steps to combat any modern slavery and human trafficking:

1. Introduction of risk based assessments to identify areas of high risk of Human Rights abuses within our supply chain;
2. Introduction of Responsible Procurement Policy;
3. Rolling out the new supplier pre-qualification procedure that includes a specific section on Modern Slavery and Human Trafficking and will require suppliers to sign up to the Tata Code of Conduct;
4. New anti-slavery training for employees & raising awareness of whistleblowing procedures;
5. Update supplier terms and conditions to include specific anti-slavery obligations & requirement to adhere to Tata Code of Conduct.



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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 financial year ending 31 March 2016.

A handwritten signature in blue ink, appearing to read 'M Ashcroft', is written over a horizontal dotted line.

Dr Martin Ashcroft, Director

Tata Chemicals Europe Holdings Limited

Date: 29.9.16