Naturex Ltd’s modern slavery statement for financial year 2019

Naturex Ltd, a limited company having its head offices at Park Road, Overseal, Swadlincote, United Kingdom. DE12 6JX (the UK Companies referred to as “Naturex Ltd”).

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Naturex Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Naturex Ltd has a zero tolerance approach to any form of modern slavery. We are committed to adhering to high ethical standard and acting with integrity and transparency in all business dealings and to pulling effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our Business

Naturex Ltd is part of a larger group (Naturex) which trades globally in the natural sector and which is part of a larger group (Givaudan UK Limited, Givaudan 2007 UK Limited, Givaudan Holdings UK Limited (the UK Companies referred to as “Givaudan”)), who are a leading business in this sector. Naturex Ltd offers its products to global, regional and local food, beverage, consumer goods. Naturex Ltd produces colours & flavours that delight consumers worldwide.

The company produces in two categories, Colours & Flavour.

The Colours operation offers a range of natural colours for products in confectionery, baked goods, sugar confectionary, chocolates, and chewing gums; beverages, such as soft drinks, fruit juices, and instant beverages; dairy products, including ice creams and yogurts, desserts, and yellow fats; and savoury products comprising ready-made meals, snacks, soups and sauces, and meat and poultry products.

The Flavours operation provides a natural alternative to either sweet or savoury applications across both food and pharmaceutical products globally.

Naturex Ltd complies every day, in all business activities, with UK laws and regulations as well as with our policies, practices and procedures. We facilitate a culture where we can freely discuss and report ethical, compliance and legal issues.

Our Policies

Within the Naturex Ltd organisation, the Givaudan Principles of Conduct is a governing charter for ethical behaviour including:

- **Legal and Ethical Dealings provisions.** Givaudan believes in compliance with all laws and policies that apply to our business in the countries in which we operate. We are committed to and adhere to the highest ethical standards in all business dealings.

- **Responsible Corporate Citizenship provisions.** We are committed to respect for human rights wherever we do business and in all communities in which we are present. We believe in fair employment standards and do not tolerate or practice any form of child exploitation or forced labour or engage with suppliers who do not adhere to a strict anti-slavery policy.
• Disclosure and Transparency Policy. We encourage all our employees, contractors and workers to come forward with any concerns regarding how colleagues are being treated, practices within our business or supply chain or any violations against any policy operated by us without fear of retaliation or reprisal. If our employees do not feel comfortable contacting their local compliance officer or legal department, they are encouraged to use the Givaudan Compliance Helpline which is confidential and operated in every Company Language.

In addition to the Principles of Conduct, Givaudan has further policies and procedures including:

• Global Anti-Bribery Gifts, Entertainment and Hospitality elements are all covered in our Code of Conduct Policy. This Policy sets out Naturex Ltd’s ethical behaviour standards and the principal anti-corruption rules that apply to our business.

• Responsible Purchasing Charter. This policy outlines health and safety, social, environment and business integrity principles we require all our suppliers and service providers to acknowledge.

Givaudan is also a signatory to the United Nations Global Compact ("UNGC") which includes principles in the areas of human rights, labour and anti-corruption.

Our Suppliers

We strictly adhere to compliance with the UK Modern Slavery Act as well as the US California Transparency in Supply Chain Act.

As the world’s leading manufacturer of specialty plant-based ingredients, Naturex has committed to a formal sustainability approach known as “The Pathfinder,” strongly inspired from the Sustainable Development Goals (SDG) from the United Nations. which aims to protect the environment, promote social progress, and foster economic development. In the Purchasing Department, this program has an impact on all stakeholders involved: Naturex purchasers, suppliers and their subcontractors. Naturex considers that the respect of individual rights and legislation in force is a prerequisite for any business partnership, and so we ask all our suppliers to commit and adhere to our Responsible Sourcing Charter and Supplier Compliance Commitments. Further, Naturex Ltd participates in the Supplier Ethical Data Exchange ("SEDEX") program with the aim to drive improvements in ethical and responsible business practices in our own operations. A core principle of SEDEX is to avoid unfair and unsafe labour practices including slavery and human trafficking.

During Q4 of 2018, the entire Naturex group has been acquired by Givaudan, so we continue integrating our business into the larger portfolio of Givaudan UK. As such we will harmonise business operations ensuring that where relevant and applicable we will continue to maintain or enhance our ethical or business standards in respecting all relevant laws.

Training

We conducted and we will continue to conduct training on Naturex Ltd’s Code of Conduct for all employees which includes the above mentioned principles and charters so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our business or supply chain.
COVID-19

Naturex is performing regular risk reviews to assess the impact of the Covid-19 pandemic on its strategy, operations and supply chains. This risk assessment is reviewed by Givaudan’s group executive committee and board of directors together with our board of directors at regular intervals.

Among the risks identified and managed are the risks of health and safety of our employees, in particular its operations personnel as well as the breakdown and health and safety of its suppliers’ workers.

Naturex addresses the risk of its own employees’ health and safety by a variety of measures including social distancing, providing personal protective equipment, asking employees to work from home where possible and proposing additional measures for mental and emotional well-being.

Regarding the risk of a breakdown of the supply chains and the health and safety of the suppliers’ workers, being part of the essential supply chain, Givaudan supports suppliers chiefly by continuing to order with essentially the same order and payment pattern as before the crisis. In addition, Givaudan has also supported suppliers by providing hygiene items, such as e.g. hand sanitisers, to suppliers as necessary.

The grievance procedures enshrined in Givaudan’s Responsible Sourcing Policy continue to apply to suppliers regardless of the Covid-19 pandemic.

Further steps have been taken to review the increased risks posed within the business and supply chain of modern slavery and the pressures faced as a result of Covid-19. Consultations with employees and suppliers and continued access to the Givaudan Helpline and reporting guidelines are in place.

Our Performance Indicators

We will know the effectiveness of the steps we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain when:

- No reports are received from employees
- Transparency on full traceability to the raw materials source is provided
- No pushbacks or reporting received from supply chain when the Responsible Sourcing Charter and Commitments were released

Delay of this publication

Due to the additional risks faced under Covid-19 and the updated policies and procedures required as a result of the coronavirus pandemic, publication of this statement has been delayed whilst the Company addressed measures needed to provide a safe and secure working environment within our workforce and supplier chains. Naturex and Givaudan shall make continued efforts to implement all governmental guidance and regulations as this situation develops, and to monitor all risks

Approval for this Statement

Approval for this statement by company management:
Name: Jamie Mead
Position: Plant Director and Company Manager – Naturex Ltd
Signature: 
Date: 9/1/20

Name: Sean Cumiskey
Position: Sales Director – Naturex Ltd
Signature: 
Date: 9/1/20