

# MODERN SLAVERY POLICY

## 1. Policy Statement

Modern slavery takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. It is a crime and a violation of fundamental human rights.

SUPRA PERFECTA has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are committed to transparency in our business and in our approach to tackling modern slavery, consistent with our disclosure obligations under the **Modern Slavery Act 2015**.

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## 2. Our Organisation and Supply Chains

### Our Business

SUPRA PERFECTA is a chemical manufacturer specialising in the production of **Hypochlorous Acid (HOCl)** in bulk quantities. Our operations include:

- Manufacturing and processing of Hypochlorous Acid
- Bulk storage and handling of chemical products
- Distribution to commercial and industrial customers
- Engagement of third-party fulfilment and logistics providers

We operate from [insert location(s)] and employ approximately [insert number] employees across production, quality, technical, sales and administrative functions.

### Our Supply Chains

Our supply chains include:

- Raw material suppliers
- Packaging suppliers
- Third-party warehousing and fulfilment providers
- Logistics and transport companies
- Maintenance and industrial service providers
- Recruitment and labour agencies (where applicable)

We recognise that particular risks may arise within:

- Labour-intensive warehousing and fulfilment operations
- Third-party logistics providers
- Agency labour arrangements
- Overseas raw material sourcing
- Contracted cleaning and site services

As a manufacturer handling bulk chemicals, we are particularly attentive to labour standards within onward fulfilment and distribution environments, where low-paid, temporary, or migrant labour may be engaged.

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### 3. Risk Areas in Our Business and Supply Chains

We acknowledge that modern slavery risks may arise in:

#### 3.1 Third-Party Fulfilment and Warehousing

- Use of low-paid or agency labour
- Excessive working hours
- Poor living conditions for migrant workers
- Withholding of wages or identity documents

#### 3.2 Logistics and Transport

- Subcontracted haulage providers
- Informal labour arrangements
- Cross-border transport operations

#### 3.3 Raw Material Supply

- Sourcing from jurisdictions with weaker labour protections
- Limited visibility beyond Tier 1 suppliers

We apply a risk-based approach to assessing these areas.

### 4. Our Policies Relating to Modern Slavery

We maintain and enforce the following policies:

- Modern Slavery Policy (this document)
- Code of Conduct
- Supplier Code of Conduct
- Whistleblowing Policy
- Recruitment and Employment Policy
- Health & Safety Policy

Our Supplier Code of Conduct requires:

- No forced, bonded or compulsory labour
- No child labour
- No retention of worker identity documents
- Payment of wages in accordance with applicable laws
- Compliance with working time regulations
- Freedom of movement and freedom of association where legally permitted

We expect suppliers to cascade these standards through their own supply chains.

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### 5. Due Diligence Processes

To manage and prevent risks of modern slavery, we implement the following controls:

#### 5.1 Supplier Onboarding

- Risk-based supplier assessment prior to appointment
- Completion of supplier questionnaires (where appropriate)
- Contractual clauses prohibiting forced and trafficked labour
- Requirement to comply with our Supplier Code of Conduct

#### 5.2 Fulfilment and Logistics Oversight

Given the elevated risk profile of warehousing and fulfilment operations, we:

- Assess labour practices of fulfilment partners
- Require confirmation of compliance with minimum wage and working time laws
- Seek transparency regarding use of agency or migrant labour
- Reserve the right to audit or request evidence of labour standards
- Require partners to confirm no recruitment fees are charged to workers

#### 5.3 Ongoing Monitoring

- Periodic supplier review
- Escalation procedures for concerns raised
- Investigation of any allegations
- Review of whistleblowing reports

Where risks are identified, we work with suppliers to implement corrective action plans. Termination of the relationship may occur where breaches are serious or remediation is not achieved.

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### 6. Training and Awareness

We are committed to ensuring that relevant staff understand modern slavery risks.

- All employees receive awareness of this policy.
- Managers and procurement personnel receive additional guidance on identifying supply chain risks.
- Staff involved in supplier selection and management are trained to recognise indicators of labour exploitation.

Training may include:

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- Policy briefings
- Induction sessions
- Periodic updates
- Targeted management training

### 7. Key Performance Indicators (KPIs)

To measure the effectiveness of our modern slavery programme, we monitor:

- % of key suppliers subject to modern slavery risk assessment
- % of fulfilment partners confirming compliance with labour standards
- % of supplier contracts containing modern slavery clauses
- % of relevant employees trained on modern slavery awareness
- Number of reported concerns and time taken to investigate
- Completion rate of corrective action plans

These KPIs are reviewed annually by senior management.

### 8. Compliance with This Policy

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.

Employees must:

- Avoid any activity that might lead to, or suggest, a breach of this policy.
- Notify a line manager or director as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur.

We encourage the raising of concerns without fear of retaliation. Reports may be made in accordance with our Whistleblowing Policy.

### 9. Breaches of This Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with individuals, contractors, fulfilment providers, logistics partners, or suppliers working on our behalf if they breach this policy or fail to implement required corrective actions.

### 10. Governance and Review

This policy is approved by the Directors of SUPRA PERFECTA and will be reviewed annually or sooner if legislative or operational changes require it.

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THE GLOBAL STANDARD IN DISINFECTION

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Signed:

A handwritten signature in black ink, appearing to read "Alain Giraud".

Alain Giraud  
Managing Director

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