Modern Slavery Policy
Modern Slavery Statement


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.

TCE Group 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 TCE Group).

ORGANISATION STRUCTURE

We are a manufacturer in the chemicals sector, producing sodium carbonate, salt and sodium bicarbonate and other products. We are part of the global Tata Chemicals Group and our ultimate company is Tata Chemicals Limited in India. The TCE group has all its operations in the UK, with its head office in Northwich, Cheshire and employs around 400 people.

TCE Group is committed to developing its’ social and environmental responsibilities and are fully committed to playing our part in eradicating modern slavery. We advocate for transparency and collaboration to eliminate the risks of modern slavery and ensure that we take appropriate action where necessary.

The Company is committed to operating and promoting ethical and lawful business practices within the workplace. This is evidenced through our recruitment vetting procedures, our occupational health procedures (we are a mindful employer) and our long standing Trades Union agreements. We have a number of training packages around Modern Slavery, Equality and Diversity as well as Bribery, all underpinned by our global Tata Code of Conduct. The Tata Code of Conduct is a contractual obligation for all employees.

This statement refers to the financial year ending 31st March 2020 and relates to all businesses operating as part of the Group across the UK during this time. It sets out the steps taken by TCE Group to prevent modern slavery and human trafficking in our own operations and supply chains.
Modern Slavery Statement

OUR BUSINESS AND SUPPLY CHAINS

TCE Group spends over £80 million each year on goods and services and raw materials to support the manufacturing and distribution processes.

To meet business needs, the procurement function is responsible for managing and improving our procedures around supplier selection, qualification and on-going compliance and performance. The organisation undertakes due diligence when considering taking on new suppliers, and reviews its existing suppliers. Over the past 12 months:

- TCE has developed and launched supplier pre-qualifications using SAP Ariba so that we can track and monitor supplier responses to Modern Slavery. All suppliers will be rejected if they cannot comply with our requirements to demonstrate their compliance to Modern Slavery.

- TCE Group would have no hesitation in termination of the business relationship if a supplier was found to have contravened their commitment to the act or refused to comply with the act.

- We have published our Responsible Procurement Policy on both our internal Intranet and external website

RESPONSIBILITIES AND POLICIES

Responsibility for the organisation's Corporate Social Responsibility initiatives, which includes anti-slavery, sits with the TCE Board.

Our approach to addressing modern slavery is supported by a number of organisational policies and we take any breach of our policies or allegations extremely seriously. In the last 12 months there have been no reported incidents in relation to modern slavery or human trafficking.

Modern Slavery Policy statement – sets out our commitment to preventing modern slavery or human trafficking in the delivery of our service and full support in the promotion of ethical and lawful business practices within the workplace.
Modern Slavery Statement

Whistleblowing policy - encourages all its workers, 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. We also have a whistleblowing helpline called Integrity matters to ensure the highest levels of quality and confidentiality.

Tata code of conduct - makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour.

Our engagement processes, Procurement and Supply Chain Frameworks set out our commitment to ensuring that our supply chain adheres to the highest standards of ethics.

Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat their workers with dignity and respect, and act ethically and within the law at all times.

HR Vetting – We utilise the services of a master vendor recruitment agency in relation to employing people on either a permanent or temporary basis and verify the practices of the agency. All employees, contractors and agency workers have their right to work in the UK verified. As an organisation we ensure that we adhere to legislation in relation to minimum age requirements, wages and the Working Time Directive. We also vet our employees and conduct background checks. We have improved this vetting in the past 12 months to include criminal background checks and financial checks for key areas of the business.

TRAINING

TCE Group requires all employees working within the organisation to complete training on our organisational policies. We believe that awareness is one of our most effective methods to reduce the risk of modern slavery. In 2018/2019 we trained 143 colleagues in Modern Slavery. New employees complete our mandatory e-learning induction programme; this includes a safeguarding module which highlights the importance of recognising Modern Slavery.
Modern Slavery Statement

This year, we have also launched our employee value proposition. This covers a host of printed and online guidelines around our employer brand, our guides to recruitment and induction. These include toolkits for both managers and employees. Modern slavery is at the heart of these documents and colleagues are continuously made aware of their responsibilities around Modern Slavery.

We have also established the need for a modern slavery workshop for key risk areas such as HR and Procurement which aims to enable employees to -

- Define Modern Slavery
- Recognise the types of individuals who might be at risk of becoming a victim of modern slavery
- Identify the warning signs of someone who is a victim of modern slavery
- Know where to signpost individuals to for help and support

This will be launched in January 2020. We continue to strengthen employee awareness of our stance on slavery and human trafficking through articles on our internal communications channels, which includes notice boards and workplace (Facebook for work).

THE FUTURE

Over the course of the next financial year we will continue to raise awareness and understanding the risk of modern-day slavery within our business and enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers.

Our supplier portal is currently on track for launch on January 2020. This portal will allow our supplier to access our policies and procedures and their obligations to work with us and for us.

This statement has been formally approved by the TCE Board and signed on their behalf.

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Dr Martin Ashcroft, Director
TCE Group Limited