

KLUMAN & BALTER

“...the food manufacturer's main ingredient.”

A BRENNTAG GROUP COMPANY

MODERN SLAVERY ACT TRANSPARENCY STATEMENT

Kluman & Balter

1 INTRODUCTION

Kluman & Balter Limited is committed to carrying out business responsibly. We aim to act ethically and with integrity as a business and in all of our business relationships, which includes ensuring that slavery and human trafficking are not taking place in any part of our business or supply chain.

This statement is intended to provide details of the steps we have taken as a business during the last financial year towards ensuring that slavery and human trafficking are not taking place in our organisation, or in our supply chain.

This statement refers to the financial year ending 31 December 2017.

2 OUR ORGANISATION

(a) **Our structure:** We are bakery ingredients suppliers based and incorporated in the UK. Our head office is located in Essex and we have 74 employees.

(b) **Our business:** The main activities of our business are those of distribution. We distribute a comprehensive range of bakery ingredients as well as a large variety of bakery and confectionary mixes.

We have a global annual turnover in excess of £36 million.

(c) **Our supply chains:** Our supply chain includes:

- (i) Distribution
- (ii) Procurement of goods and services
- (iii) Sub-contracting

We use a range of suppliers, based across a number of locations and countries. Our top 10 suppliers are predominantly based in the UK.

3 OUR POLICIES

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We therefore have in place the following policies and procedures:

(a) Whistleblowing Policy, which encourages all staff to report any suspected wrongdoing;

(b) Anti-corruption and bribery policy.

In March 2018, the Company also introduced a Modern Slavery and Human Trafficking policy. When producing this policy, we undertook a review of our compliance obligations and our existing workplace policies and procedures.

In addition to the policies set out above, we have a number of other existing policies which we are confident will assist and allow individuals to come forward and raise any concerns regarding modern slavery or human trafficking. These policies cover issues such as grievances and disciplinary issues.



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4 OUR DUE DILIGENCE PROCESSES

We carry out accreditation checks on all of our suppliers and provide them with a Supplier Evaluation Form which sets out the details of these accreditation checks. It is also a requirement that all of our suppliers sign a New Account Form and permit regular onsite audits.

- Kluman & Balter has processes in place to support on-going assessment and management of risks associated with our partner engagements, direct business operations and business relationships. We will not work with customers, suppliers or sub-contractors who do not share our commitment to high ethical standards, particularly in relation to modern slavery.
- Our Code of Business Conduct & Ethics and whistleblowing policy provide a process for reporting or raising concerns about any wrongdoing to the Group Compliance Officer, in confidence and without fear of retaliation.

5 OUR APPROACH TO ASSESSING AND MANAGING RISK

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values, we have in place, a compliance team, consisting of the following departments:

- (a) Legal
- (b) Audit and compliance
- (c) Human resources
- (d) Procurement
- (e) Sales

6 OUR TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will be providing regular training and information to all our staff.

7 NEXT STEPS

Kluman & Balter recognizes that we are exposed to the risk of slavery and human trafficking in our business operations and supply chains. We believe the greatest risk exists with our subcontractors and suppliers. We recognize different geographic locations and sectors present higher risks of slavery and human trafficking than others. Membership of global programs, through our parent company Brenntag UK Holding Limited, will continue to help us to manage this risk.

In addition, during the financial year ending 31 December 2017, Kluman & Balter will continue to develop and enhance our risk assessment processes to allow us to better understand the sectors and locations where our risk of slavery and human trafficking is the greatest. Once that assessment has been completed, Kluman & Balter will review how we manage those risks, and measure our progress to ensure no slavery and human trafficking is present within our operations and supply chain.

We will also continue to review our policies, processes and training going forward to make sure they appropriately address our commitment to eliminate slavery and human trafficking from our operations and supply chain. We will ensure we have robust management processes for identifying and managing modern slavery and human rights risks across our supply chain and ensuring awareness and training amongst our employees.

8 SECTION 54 STATEMENT

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement for the financial year ending 31 December 2017. It has been approved by the Board of Directors.



DIRECTOR
KLUMAN & BALTER LIMITED
MARCH 2018

