



Modern Slavery Statement

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Philmar (Holdings) Limited and its subsidiary companies 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.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. We have a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting 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

We are a UK based lubricant manufacturer, who supplies to distribution centres and end users throughout the UK, Europe and to other international destinations. These include automotive workshops, metalworking, textile and food processing industries.

The Group Structure is:

		Company Registration Number
Parent Company	- Philmar Holdings Ltd	07074888
Subsidiary Companies	- Philmar Petroleum Ltd	03127653
	Exol Lubricants Ltd	02587124
	Exol Lubricants (Rotherham) Ltd	02808736
	John Brindle Oil & Chemical Ltd	03695450
	Greenway Lubricants Ltd	04312564
	Core Holding Ltd	03671679
	Core Trading Ltd	02069834
	Crystal Oil Technology Ltd	03395938

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Ethics Policy.
4. Child Protection Policy.



Our suppliers

We operate a supplier policy and maintain an approved supplier list.

Our relationship with our suppliers has been established over a number of years and has been built upon mutually beneficial factors, especially where we have close and personal links and contact with the owners or directors of such companies.

As and when we bring on board new contractors or suppliers, we will conduct due diligence before allowing them to become an approved supplier. This due diligence will aim to include an on-site audits which include a review of working conditions.

Our anti-slavery policy will form part of our contract with all new suppliers and they will be required to confirm that no part of their business operations contradicts this policy.

Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk:

- Identify and assess potential risk areas when considering taking on new suppliers and regularly review our existing supply chains
- Where possible build long standing relationships with local suppliers and customers and make clear our expectations of business behaviour
- Monitor potential risk areas in our supply chains
- Have in place systems to encourage the reporting of concerns and the protection of whistle blowers

Training

We have zero tolerance to slavery and human trafficking. To maintain awareness and ensure a high level of understanding of the risks of modern slavery and human trafficking in our business our Anti-Slavery Policy is available in our Employee Handbook.

Approval for this statement

This statement was approved by the Board of Directors

Name (Director): Scott Donaldson

Signature:

Date: 4th April 2019