

## **TER Chemicals Distribution Group Slavery and human trafficking statement 2025 (relating to the financial year ending 2024)**

### **Background**

"Modern slavery" is a term used to describe criminal offences of slavery, servitude, forced labor and human trafficking. Respective deprivations of a person's liberty often are aiming at maximizing financial goals only and are a violation of fundamental human rights.

We, TER Chemicals Distribution Group, are committed to ensuring that modern slavery does not take place within our business or supply chain.

TER Chemicals is a global group of specialty chemicals trading companies managed from Ter Hell & Co. GmbH headquarters, which was founded in 1908 and has its headquarters in Hamburg. The range of traded products extends from additives for most diverse applications, binding agents, dispersions and polymers to resins, bulking agents and pigments. Our most important customers stem from the paints-, coatings-, adhesion-, food- and cosmetics industry.

Companies, namely TER France S.A.R.L., TER AS Productos S.L., TER Italia S.R.L., TER Nordic APS, TER Schweiz AG, TER AS Portugal Unipessoal LDA, TER Ingredients GmbH & Co. KG, TER Ingredients CEE GmbH, TER Ingredients S.L., TER Chemicals CEE GmbH, Gehring-Montgomery INC., Trexan Chemicals INC., TER Chemicals GmbH & Co. KG and our UK operation TER UK LTD are part of TER Chemicals Distribution Group. Because of its UK operation and as determined by the UK Modern Slavery Act 2015 TER Chemicals is bound to publish a transparency statement describing the steps taken in the last financial year to ensure the business and supply chains are free from modern slavery and human trafficking. The statement is given herewith.

Effective systems and measures with the aim of controlling and preventing slavery and human trafficking are also headed centrally by TER Chemicals GmbH & Co. KG in Hamburg.

This statement sets out the steps that TER Chemicals' companies have taken during the previous financial year to prevent slavery and human trafficking from taking place within our business and supply chain.

### **Our policy on modern slavery**

We understand the importance of putting business conduct at the heart of everything we do.

Our [Code of Conduct and Ethics Guideline](#) outlines our commitment to honesty, integrity, mutual respect and an open and diverse work culture. The Code of Conduct is available to our partners and the public on our website.

Respectively, we have based our understanding of Corporate Social Responsibility on the grounds of Ethical and Business Principles as developed by the UN Global Compact and understandings of various trade associations in the context of chemical distribution.



**TER Chemicals**  
DISTRIBUTION GROUP

### **Our activities**

We are a member of the voluntary program “Responsible Care”, which stands for an independent assessment as developed by the European Chemical Industry Council CEFIC according to the guidelines of the Responsible Care Program. As a member of the UN Global Compact, we signed a participation letter to the [UN Global Compact](#) as found on our website and among others report annually about our human rights and labor standards activities.

Moreover, we maintain a membership with the organization EcoVadis and thus are part of the CSR movement that is also defined under the term “Together for Sustainability”. In this context we submit our CSR activities to a yearly self-audit and are rated with a score card issued by EcoVadis. In 2024 we again were awarded gold medal by [EcoVadis](#). The respective report by EcoVadis [Sustainability Report](#) is also published on our homepage.

Because of our internal and external audits, we understand that the risk of slavery and human trafficking with TER Chemicals and its supply chains is mitigated.

In addition, TER Chemicals management and staff have jointly developed corporate values that are the foundation of our goals and business activities. To ensure that these values are well known and respected by our staff they are explained on posters exhibited on the walls of our office premises. Our values are: Curiosity, responsibility, passion, reliability, recognition and criticism.

Furthermore, we build into the knowledge and skills of our staff. More precisely we provide training to our staff on the risks of modern slavery and human trafficking within our business and supply chains, as well as how to identify non-compliant practices.

We encourage our employees to tell us confidentially about any suspicions they may have that slavery or human trafficking is taking place within our business or supply chains. Therefore, we operate a whistleblowing policy and system so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals. This whistleblowing system is also publicly available to other stakeholders [on our website](#).

We have in place questionnaires for the approval of new suppliers to our company group. Such questionnaire needs to be filled out and submitted by any supplier and is suited to identify and to assess potential risk areas for slavery and human trafficking in our supply chains. Moreover, updates on questionnaires are suited to monitor changed conditions and potentially arising new risks.

### **Corporate Statement**

The statement above is issued and signed as valid for TER Chemicals Distribution Group. This statement complies with the requirements of section 54(1) Modern Slavery Act 2015 and is valid for the financial year ending 31 December 2024.

14.05.2025 *Andreas Fröh*  
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Andreas Fröh, CEO

14.05.2025 *Uta Seiler*  
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Uta Seiler, CFO