Modern Slavery Statement

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Company

This statement applies to Granville Oil & Chemicals Ltd (referred to in this statement as "the Company"). The information included in the statement refers to the financial year 2025/2026.

Definitions

The Company considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Commitment

The Company acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Company understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Company does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Company in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Company strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK, and in many cases exceeds those minimums in relation to its employees.

Organisational structure

Granville Oil & Chemicals Ltd is a private limited company registered in England and Wales (Company No. 01054646). The Company acts as a manufacturer and distributor of automotive lubricants, chemicals, and workshop ancillaries.

The Company is a subsidiary of Veedol UK Limited, which is ultimately owned by Veedol Corporation Limited (formerly Tide Water Oil Co. (India) Ltd). The Company is controlled by a Board of Directors.

The Company's registered office and primary operational facility is located at: Unit 29, Goldthorpe Industrial Estate, Commercial Road, Goldthorpe, Rotherham, South Yorkshire, S63 9BL, United Kingdom.

The Company's core activities include the blending, manufacturing, and distribution of motor oils and automotive chemicals. Operations are conducted primarily from the Goldthorpe facility, which includes manufacturing, warehousing, and administrative functions. The Company distributes its products, including the Granville brand and third-party brands (such as Rain-X), to customers in the UK and international markets.

Demand for our products is consistent throughout the year; therefore, our operations are generally not seasonal.

The labour supplied to the Company in pursuance of its operation is carried out wholly in the United Kingdom (South Yorkshire region).

Supply chain structure

In order to fulfil its activities, the main supply chains of the Company include those related to:

- The procurement of raw materials (base oils and chemical additives) for lubricant blending.
- The procurement of packaging materials (bottles, caps, labels, and cardboard).
- The sourcing of finished goods from third-party manufacturers (e.g., Gunk, Autosol) for distribution.

The Company's supply chain is global in nature due to the sourcing of specialist chemical additives and base oils, though significant procurement and manufacturing occur within the UK and Europe.

Organisational policies

The Company has the following policies which further define its stance on modern slavery and ethical business conduct:

- **Employee Code of Conduct:** outlines the standards of behaviour expected from all staff, ensuring that employees act with integrity and treat colleagues and external partners with respect and dignity.
- **Sustainable Supply Chain Policy:** sets out the Company's commitment to sourcing materials responsibly, ensuring that environmental and social factors, including labour rights, are considered in procurement decisions.
- **Business Associates Code of Conduct:** establishes the minimum standards of ethical behaviour required from our suppliers, distributors, and partners, including prohibitions on forced labour and human trafficking.
- **Stakeholder Engagement Policy:** defines how the Company interacts with interested parties (including workers, customers, and the community) to ensure transparency and that their voices and concerns are heard.
- **Grievance and Disputes Policy:** provides a clear, confidential mechanism for employees to raise concerns or disputes, including potential issues regarding working conditions or unfair treatment, without fear of retaliation.
- **Anti-Bribery Policy:** reinforces our commitment to ethical trading by preventing bribery and corruption, which are often linked to the facilitation of modern slavery and supply chain exploitation.
- **Risk Management Policy:** details the framework used by the Company to identify, assess, and mitigate various business risks, including compliance and reputational risks associated with modern slavery in the supply chain.
- **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 forced labour.

- **Whistleblowing Policy:** The Company encourages all its workers, customers, and other business partners to report any concerns related to the direct activities or the supply chains of the Company.

Assessing and managing risk

The Company utilizes its Risk Management Policy to formally identify, assess, and mitigate potential threats to its ethical standards and operational integrity. Through this framework, the Company considers its main exposure to the risk of slavery and human trafficking to exist in its upstream supply chain, specifically regarding the raw material extraction and processing of chemical components or packaging materials sourced from countries where protection against breaches of human rights may be limited.

In general, the Company considers its exposure to slavery and human trafficking to be relatively limited, given that its primary manufacturing and blending operations are conducted in the United Kingdom under strict employment laws.

Nonetheless, guided by our risk management procedures, the Company has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

Due diligence in relation to modern slavery

The Company carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

These steps include:

- Building long-standing relationships with key suppliers and making clear our expectations of business behaviour.
- Requesting suppliers to confirm their compliance with the Modern Slavery Act 2015.
- Visiting supplier sites where possible to evaluate working conditions.

Training

The Company provides the following training to staff to effectively implement its stance on modern slavery:

- Induction training for all new employees outlining their rights and the Company's policies.

Monitoring and evaluation

The Company has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Company or its supply chains:

- **Completion of right-to-work checks:** 100% of new hires must be vetted before employment commences.
- **Supplier Engagement:** Reviewing the modern slavery statements of all major Tier 1 suppliers.

Steps

The Company has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Company has taken the following steps to ensure that modern slavery is not taking place:

- Reviewed supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery.
- Measures in place to identify and assess the potential risks in its supply chains.
- No steps have been taken.

Modern slavery compliance officer

The Company has a modern slavery compliance officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Company's obligations.

This statement is made in pursuance of s.54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval: 16 December 2025

Signed: J Holland

Print name: **James Holland**

Job Title: **CEO**

Date: **16 December 2025**