



BREXIT CONTINGENCY PLANNING

19th November 2020

TTC is a UK based manufacturer of pigment dispersions with manufacturing sites in Belfast, Northern Ireland and Oldbury, England. Despite on-going negotiations we still do not know if a trade deal will be agreed or not agreed between the EU and the UK. We wish to assure our customers that in the event of 'no-deal' TTC has measures in place to ensure continuity of supply for our customers both inside and outside the EU. Our approach in certain key areas if there should be no deal is outlined below.

Information

TTC remain in close contact with our raw material suppliers and our transport partners to share information and to understand their preparations. We continue to attend many briefings to keep informed about the implications of a 'no-deal'.

Ordering, Supply & Invoicing

There will be no changes to ordering, supply or invoicing for customers.

Transport & Customs Declarations

TTC sells globally so we are experienced in dealing with exports & imports and the documentation that is required for customs. We are part of the Tennants Consolidated Group which is a global international chemicals group, owning companies in both the UK and various EU countries. Our transport partners confirm that they have arrangements in place to consolidate loads away from ports and to submit customs documentation digitally so that vehicles will be 'customs cleared' before arriving at ports. In most cases vehicles are expected to pass through the ports without delay but customs authorities will make some 'documentation inspections' and some 'open-truck inspections'. Any delays are expected to be minimal.

TTC has registered with the Trader Support Service which the UK Government has established to guide users who move goods between Great Britain and Northern Ireland through any changes due to the implementation of the Northern Ireland Protocol.

EU Rules

TTC head office and main manufacturing site are based in Northern Ireland. The Protocol on Ireland/Northern Ireland in the withdrawal agreement means that Northern Ireland is in quite a distinctive position vis-à-vis the EU and will continue to be so until such time as the Protocol is replaced or its provisions disapplied. In practice it means that Northern Ireland will be expected to comply with EU rules on customs, safety and technical standards, the composition of products, and so on – all of which will no longer apply in the rest of the UK. TTC products are sold widely throughout the EU so 'no-deal' will not change our need to comply with EU legislation.

Tennants Textile Colours Limited

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Directors: M Hughes, T Glenn
Registered in England 466545 | Registered Office: 12 Upper Belgrave Street, London, SW1X 8BA



Tariffs

TTC sales are normally priced 'delivered door to door'. Goods will continue to be sold on a DDP basis, so TTC will be dealing with any customs obligations and import taxes.

- Goods supplied from our Belfast, Northern Ireland site will not be subject to tariffs in GB or the EU.
- Goods sold from our Oldbury site in GB may be subject to tariffs in the EU.
- Some of our raw materials may be subject to tariffs and some suppliers have already indicated that they will pass-on these additional charges.

TTC will look to mitigate any changes due to applicable tariffs to minimise the impact on both customer pricing and TTC profitability. This will be reviewed on a case-by-case basis.

Raw Material Inventory

TTC has maintained significantly increased raw material stockholding to mitigate against potential supply issues and we will maintain high raw material stockholdings until such times as the supply situation becomes clear.

EU-REACH

Our products will continue to be EU-REACH compliant. The majority of our raw materials have registrations based in the EU. A very small number of our raw materials have UK based registrations, but we have alternative suppliers with registrations based in the EU. ECHA has confirmed that registrations made by TTC will continue to be valid under EU-REACH.

UK-REACH

TTC will also take the necessary measures to comply with UK REACH:

- Working with raw material suppliers to check that Downstream User Import Notifications are completed before 27/10/2021 and then that subsequent registrations are completed before the relevant deadline subject to tonnage band.
- Submitting Downstream User Import Notifications as necessary to maintain continued use of raw materials until registration intentions are confirmed.
- Notifying substances supplied in products from our Belfast site to fulfil the obligations of GB importers.

We wish to assure our customers that we have taken all the practical steps available in preparation for a 'no-deal' and we will continue to be a major supplier in the UK, the EU and global markets.

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