

ELEMENTIS PLC
MODERN SLAVERY ACT STATEMENT
Year ending 31 December 2022

INTRODUCTION

This statement is made pursuant to our obligations under section 54 of the UK Modern Slavery Act 2015 and sets out the steps we have taken, during the 52 weeks ended 31 December 2022, to prevent modern slavery and human trafficking in our business and supply chain¹.

OUR COMMITMENT

Elementis Plc is committed to high standards of ethics and integrity in all our business dealings and operations. We recognise that modern slavery and human trafficking are serious global issues which require vigilance and attention. This report outlines the steps taken by Elementis in 2022 to address these risks. It is our policy to comply with all applicable laws, including the Modern Slavery Act 2015, and we are committed to ensuring there is no slavery or human trafficking in our organisation.

We are a signatory of the UN Global Compact, and fully support the ten principles (listed [here](#)) which cover fundamental responsibilities in the areas of Human Rights, Labour, Environment and Anti-Corruption.

OUR ORGANISATION

We are a global specialty chemicals company that offers performance-driven additives that help create innovative formulations for consumer and industrial applications. We are engaged in mining raw materials, innovation, manufacturing and marketing products. Our business segments in 2022 were Personal Care, Coatings & Energy, Talc and Chromium (the sale of the Chromium was announced in November 2022 and completed in January 2023). Our key sites are in Brazil, China, Finland, Germany, the Netherlands, Taiwan, the UK and the US.

Elementis plc is the parent company of the Elementis group of companies (the "Group"). As at 31 December 2022, the Group employed over 1300 people. In 2022, the Group revenue was \$921.4m. Elementis plc is listed on the London Stock Exchange and is a member of the FTSE 250 and FTSE4Good indices.

We remain committed to preventing all aspects of modern slavery, and have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. We are aware that manufacturing is one of the five key risk sectors accounting for nearly one-fifth of all forced labour exploitation of adults² and that mining is also a smaller, but significant, risk area. In terms of supply chain, we deal with a large number of suppliers. Of our ten largest suppliers, which account for a significant portion of total spend, only two of these are outside

¹ Elementis plc and Elementis UK Limited fall within the scope of section 54 of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

² see [Global Estimates of Modern Slavery 2022](#) by ILO, Walk Free and IMO

the US and Western Europe. In 2023, we will continue to work on further understanding the risks in those supply chains.

We comply with all applicable local labour laws and respect rights such as freedom of association and collective bargaining. We provide fair conditions for all our employees including terms and conditions of employment, market-related pay and benefits, working hours and holiday entitlement. We check that the individual has the correct right to work documentation. Temporary workers are employed via staffing agencies, which are required to comply with all regulations and laws applicable to our agreements with them. In the UK, our accreditation as Living Wage Employer was renewed by the Living Wage Foundation in March 2022, meaning that we continue to meet the standards set by Citizens UK and the Living Wage Foundation.

Further information regarding our business model can be found on our website www.elementis.com and in our Annual Report available [here](#).

NEW POLICIES IN 2022

In 2022 we published our new **Code of Conduct**, entitled “Integrity is our Specialty” which sets out our approach to acting fairly and ethically in our business. A copy of the Code can be accessed [here](#).

Our Code is a practical roadmap for acting with integrity. It offers guidance in acting in accordance with our Elementis Values, which are Safety, Solutions, Ambition, Respect and Team. As the Code cannot cover every situation, it also sets out how to seek help and how to report any concerns.



In 2022, we also established a **Whistleblowing and Speak Up Policy**, which sets out the speak up channels at Elementis and how we deal with concerns raised, which would include any concerns raised about Human Rights. Elementis does not tolerate retaliation against anyone who raises a concern in good faith.

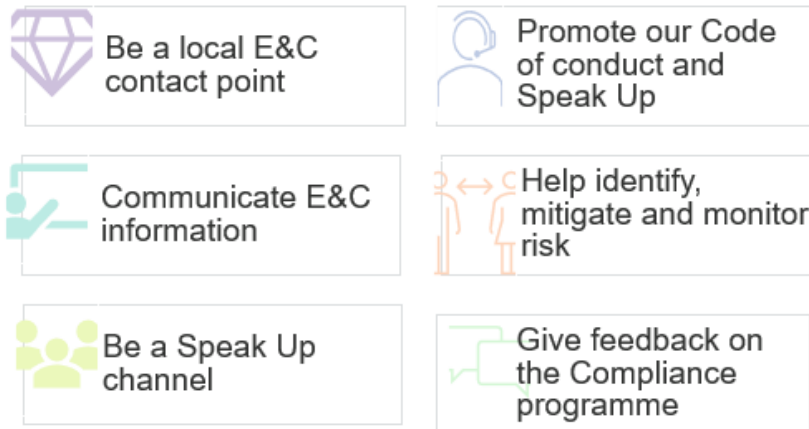
INTEGRITY IS OUR SPECIALTY

Our Code specifically addresses Human Rights and makes it clear that we prohibit all forms of slavery and are committed to keeping such practices out of our global supply chain. Our Code clearly states that the use of forced or child labour is against the law and is an affront to our Values. Preventing modern slavery and protecting human rights is fundamental to how we operate. We do not tolerate forced or child labour in our workplace or in our global supply chain.

Our Code also gives guidance on making ethical decisions. It also encourages people to speak up about concerns and gives options for doing this, including via an independently run hotline, available 24/7 in multiple languages. Elementis takes a zero-tolerance approach to retaliation against anyone who raises a concern in good faith.

ETHICS AND COMPLIANCE CHAMPIONS

We set up a network of Ethics and Compliance (E&C) Champions to help communicate on Ethics and Compliance topics at our local sites, including Modern Slavery and Human Rights. Their functions are as follows:



UPDATING PURCHASING DOCUMENTS AND RAISING AWARENESS WITH SUPPLIERS

We prohibit all forms of slavery and are committed to keeping such practices out of our global supply chain. Our Code of Conduct is clear that we expect our suppliers to abide by the same standard and that we do not tolerate forced or child labour in our workplace or in our global supply chain. Our standard purchasing agreement contains specific prohibitions on modern slavery and provisions on ethical sourcing. We also made use of a Supplier Social Responsibility Commitment in some areas, which covers legal compliance, including specific reference to no child labour and respecting human rights. We intend to update and extend the use of this in 2023. In Asia, a supplier survey took place which also included sharing content on our position regarding modern slavery with suppliers.

UYGHUR RISK REVIEW

During 2022, we undertook a specific review of our suppliers in relation to the risks of forced Uyghur labour, to ensure compliance with the new US Uyghur Forced Labor Prevention Act. This involved assessing the risks in our supply chain by reference to the entities, goods involved and location of suppliers, and entering into dialogue with any suppliers which were considered high-risk.

PROGRESSING NEW THIRD PARTY SCREENING SYSTEM

In 2022, we signed a contract for a new third party business integrity screening system to be used throughout our business globally. A key rationale in our decision to procure, adopt and integrate this new system into our business processes, is to enable us to screen third parties for human rights, modern slavery and labour concerns. During 2022 we identified the training for our Procurement and Sales colleagues that will be required to interact with the new screening tool and the reports that will be generated.

NO CONCERNS RAISED ON MODERN SLAVERY IN 2022

No reports were received via our IntegrityCounts hotline or other speak up channels regarding modern slavery or human rights concerns.

EXTERNAL ASSESSMENTS VALID IN 2022

Ecovadis



In 2022, we achieved an Ecovadis Gold rating for the second year in a row (following 7 years of a silver rating), and with an improved score, reflecting our determination to continually minimise our environmental impact, protect human and labour rights, keep each other safe, maintain a responsible supply chain, and conduct our business with the highest ethical standards. Our Ecovadis certificate can be viewed [here](#).

Responsible Chromium

In 2022, our Chromium business (since sold) was awarded the Responsible Chromium Award, for the second consecutive year, by the International Chromium Development Association (ICDA). The award indicates high standards in safety, ethics, human rights, environment and anti-corruption.

FTSE4Good

We remain part of the FTSE4Good, a leading global responsible investment index. We are recognised as having met the corporate responsibility criteria for inclusion in the membership of the index, which is reviewed on an annual basis, and have been a member since 2009.

This statement was approved by the Board of Directors on 1st March 2023 and signed by our Chief Executive Officer, Paul Waterman.

Paul Waterman
CEO
1st March 2023