

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

Modern Slavery is a crime and a gross violation of fundamental human rights. Sibelco has a zero-tolerance approach to modern slavery, and we are fully committed to preventing slavery and human trafficking in our corporate activities and to ensuring there is transparency in our own businesses and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the UK Modern Slavery Act 2015. This statement sets out the actions that we have taken to understand all potential slavery risks related to our business, and to implement steps to prevent slavery and human trafficking.

This statement has the full support of the Sibelco UK Ltd's board of directors.

Our structure and business

The Sibelco Group is a global material solutions company: Sibelco sources, transforms and distributes specialty industrial minerals, particularly, silica, clays, feldspaths and olivine and is a leader in glass recycling. Sibelco serves industries as diverse as glass, ceramics, construction, coatings, polymers and water purification. With around 5.000 employees, the Sibelco Group operates over 100 mines, plants, sales offices and distribution warehouses in around 32 countries across the wider Europe, Asia Pacific, North- and South America regions.

The Sibelco Group operates in a number of different countries and carries out its business in the UK mainly through Sibelco UK Ltd.

Our supply chains

Sibelco recognizes its responsibility and has alerted relevant staff to the risks of slavery in our businesses and across the wider supply chain. Those staff are expected and encouraged to report concerns to management, who will act upon them. The relationship with the majority of our suppliers has been established over a number of years. Conducting our business to high ethical standards is a continuous element of our third-party management and an ever-green topic during business cooperation with our suppliers.

Sibelco expects all its suppliers (and further down the chain) to comply with its **Supplier Code of Conduct** which is an important component in our supplier selection and evaluation process and compliance with the Supplier Code of Conduct is always a prerequisite for working with Sibelco. A copy of the Supplier Code of Conduct and Sibelco's Purchasing Terms and Conditions, equally referencing the Sibelco Code of Conduct, can be consulted on the following webpages:

https://assets-eu-01.kc-usercontent.com/54dbafb3-2008-0172-7e3d-74a0128faac8/9a293f66-a181-4bd2-8c9b-6e006387ce3e/Supplier_ConductCode.pdf

[https://assets-eu-01.kc-usercontent.com/54dbafb3-2008-0172-7e3d-74a0128faac8/a058925b-6523-424e-83e5-cfe0c1f2b181/Sibelco-Global-Purchase-Terms-Conditions-03.2020-EN%20\(1\).pdf](https://assets-eu-01.kc-usercontent.com/54dbafb3-2008-0172-7e3d-74a0128faac8/a058925b-6523-424e-83e5-cfe0c1f2b181/Sibelco-Global-Purchase-Terms-Conditions-03.2020-EN%20(1).pdf)

Our policies on modern slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we operate in line with principles of responsible sourcing, including paying employees at the prevailing minimum wage applicable within their relevant country of operations.

Our **Code of Conduct** reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ethical behaviour, including ensuring slavery and human trafficking is not taking place anywhere in our supply chains. Our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain. The Sibelco Code of Conduct can be consulted on:

<https://assets-eu-01.kc-usercontent.com/54dbafb3-2008-0172-7e3d-74a0128faac8/4e76be70-ac57-42cc-b353-3941719fdafa/Sibelco-Code-of-Conduct.pdf>

Among the other policies that we consider give us strength in avoiding modern slavery and human trafficking under the Modern Slavery Act in our business, are Sibelco's Supplier Code of Conduct and our **Whistleblowing Policy**. We encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential point of contact to protect the identity of whistleblowers. The Whistleblowing Policy can be consulted on:

<https://www.sibelco.com/reportline>

There have been no breaches or suspected breaches related to modern slavery or human trafficking reported in 2022 or as at today.

Risk assessment and due diligence processes for modern slavery and human trafficking

As part of our initiative to identify and mitigate risk, we have put in place systems to monitor potential risk areas in our supply chains including selective supplier audits, and due diligence to determine compliance with applicable laws and ethical behaviours as part of our overall compliance programme.

We undertake bi-annual enterprise risk assessment, which include the identification, monitoring and mitigation actions with respect to industry risk, business transaction risk and risk in the countries in which we operate.

We collaborate with internal and external audits conducted on site to safeguard the application of the code, policies and procedures that complement it.

Training

To maintain awareness and ensure a high level of understanding of the risks of modern slavery and human trafficking across our businesses we train staff members as part of overall compliance training.

Each Sibelco employee has the obligation to participate in training on the Sibelco Code of Conduct during onboarding and regularly during the employment. The purpose of the training is to offer practical insights and explain concretely how the Code of Conduct helps us perform ethically, responsibly, and sustainably. Sibelco has rolled out e-learning courses to all employees and supplier contacts. Training is mandatory.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes Sibelco UK Ltd.'s modern slavery and human trafficking statement for the financial year ending 31 December 2022.

Signed for and on behalf of Sibelco UK Ltd. on 29th September 2023.

Director: Mark James

Signature: M.C. James

