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An Orbia business.

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1.38 Modern Slavery Act Transparency Statement

MEXICHEM SPECIALTY COMPOUNDS LIMITED

MODERN SLAVERY STATEMENT (the "Statement")

This Statement is published in accordance with section 54(1) of the Modern Slavery Act 2015 ("MSA) and sets out the actions that Mexichem Specialty Compounds Ltd Limited (a legal entity of Alphagary, an Orbia business) has taken during the financial year ended 31 December 2024 to address modern slavery. It also outlines the steps that Mexichem Specialty Compounds Ltd will continue to take to identify, prevent and, where found, eliminate modern slavery in its business and supply chains.

Introduction

Modern Slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Victims are coerced, deceived, and forced against their free will into providing work or services. Modern slavery is a crime, and a violation of fundamental human rights and Mexichem Specialty Compounds Ltd recognizes that this is a global issue taking many forms and affecting many industries and sectors. Mexichem Specialty Compounds Ltd acknowledges its responsibilities in respect of anti-slavery and human trafficking and is committed to improving its practices to combat slavery and human trafficking.

Organisation's structure

Mexichem Specialty Compounds Ltd is a subsidiary of Mexichem Fluor, S.A. de C.V. The Mexichem business is a global leader in the development, manufacture and supply of plastic compound that play a fundamental role in enhancing everyday lives. We are a producer of wire & cable compounds, and our products are used by our customers globally to produce refrigerants and medical grade hydrofluoric acid for use in the pharmaceutical sector. Our products are sold in over 30 countries around the world.

We are a part of the Orbia Group, a community of companies working together to tackle some of the world's most complex challenges. The Orbia community is bound by a common purpose: To Advance Life Around the World. Our ultimate parent company is Orbia Advance Corporation, S.A.B. de C.V. ("Orbia") which has its head office in Mexico. Orbia has over 24,000 employees worldwide, with operations in 50 countries.

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Mexichem Specialty Compounds Ltd currently employs 191 people and has 2 manufacturing sites at:

- 8 Beler Way, Leicester Road Industrial Estate, Melton Mowbray, Leicestershire LE13 0DG
- Stephanie Works, Chinley, High Peaks, SK23 6BT.

Mexichem Specialty Compounds Ltd has Manufacturing, Service Delivery, Finance, Commercial, Technical and R&D functions located in the UK.

The team in Mexichem Specialty Compounds Ltd works with colleagues in the UK, US, Mexico and India, which are four countries where the wider Mexichem business has operations globally.

Our supply chains

Mexichem Specialty Compounds Ltd's supply chain includes circa 1000 suppliers actively supplying goods and services to Mexichem Specialty Compounds Ltd from across 25 countries globally, from regions including Europe, India, Middle East, North America, and Asia Pacific.

Categories of supply include Raw Materials, Packaging, Industrial Equipment, Professional Services, HR Services, Logistics Services, IT Goods and Services and Workplace Services.

We deliver a range of finished products to our customers worldwide, interacting with organizations across Europe, India, Middle East, North America, South America and Asia Pacific. Finished product is delivered in a variety of packages, including FIBC's and small bags ranging in size from 15kg bags to 1ton. A variety of transportation is used including rail, road, and sea.

Our policies on slavery and human trafficking

Orbia has a strict policy prohibiting any form of modern slavery or human trafficking in our supply chains or in any part of our business and has made those expectations clear to its suppliers. In May 2024, Orbia held its annual Ethics Month events, in which colleagues are required to complete online Code of Ethics training and invited to attend a webcast with the global Ethics & Compliance team. The 2024 online training module, like the 2023 and 2022 courses, reinforces Orbia's prohibition of modern slavery contained in its Code of Ethics, and the course has a dedicated discussion of this important topic for all employees, with additional content for employees in the Supply Chain function.

Orbia also has publicly available global policies, including a Human Rights Policy (Human Rights Policy | Orbia) and Anti-Slavery & Human Trafficking Policy (Anti-Slavery & Human Trafficking | Orbia), all of which apply to Mexichem Specialty Compounds Ltd and which address this topic. These policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective

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systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. Orbia's 2024 Sustainability Report additionally makes clear that Orbia is committed to ensuring that its supply chain complies with human rights and modern slavery laws.

Orbia has policies in place to encourage individuals to submit reports of suspected violations of our Code of Ethics, as well as to ask for guidance related to policies and procedures. Orbia administers an Ethics Helpline, which is available 24 hours a day, 7 days a week, in all the languages of the countries where Orbia does business. The Ethics Helpline is available for anonymous reporting, and can be accessed by third parties, including Orbia's and Mexichem Specialty Compounds Ltd's suppliers and business partners by visiting its webpage at www.orbia.com. All reports are fully reviewed, investigated, and the appropriate action taken as a result. Orbia's 2024 Sustainability Report details more information about the Ethics Helpline, including the fact that we received and addressed **430** matters in 2024.

Orbia's policies are developed by subject matter experts and are signed off at the Vice President level. As part of the Orbia family, Mexichem Specialty Compounds Ltd benefits from having a consistent global approach to these policies. We believe that it is important to review these policies periodically to ensure they meet evolving requirements. The Human Rights and Anti-Slavery & Human Trafficking Policies were reviewed in January 2022 and are currently being reviewed again in 2025..

Finally, sourcing of goods and services is governed by Mexichem Specialty Compounds Ltd's Procurement Policy, which requires all such activities to be undertaken in accordance with our Code of Ethics, applicable to all Orbia suppliers. In December 2023, Orbia published its Supplier Code of Conduct, which sets forth Orbia's expectations on a variety of topics, including that suppliers will have processes in place to meet applicable labor and human rights laws. The new Supplier Code of Conduct has been disseminated to all Mexichem Specialty Compounds Ltd. suppliers as of 2025..

Due diligence processes for slavery and human trafficking

We believe our biggest exposure to Modern Slavery to be within the supply base, rather than our own internal recruitment process.

We have taken steps to mitigate both our internal recruiting risk and that within our supply chain. For example, we currently undertake due diligence within our own recruitment process, completing identity and right to work checks. On the supplier selection and approval front, we undertake due diligence during the onboarding process of suppliers.

Our standard supplier contract terms and conditions include obligations on our suppliers to comply with all applicable laws, statutes and regulations (which would include the Modern Slavery Act 2015). Failure to comply with these provisions gives us the ability to terminate agreement with that supplier. The Supplier Code of

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Conduct, acknowledged and signed by Orbia's suppliers, also gives Orbia the right to suspend or end the relationship with any supplier that does not comply with its provisions.

We also have in place systems to protect whistleblowers and in May 2023, we refreshed Orbia's Speak Up, Investigations and Non-Retaliation Policy. This Policy makes clear that anyone who raises a concern in good faith, including suppliers, are protected under Orbia's non-retaliation policy. We also make Orbia's Ethics Helpline publicly available on Orbia's website, which means Orbia's business partners or other third parties can report violations of the law, including making an anonymous report.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to all employees. All such employees are required to complete an online or in-person Code of Ethics training module annually during Ethics Month, which typically takes place in the spring. The importance of compliance with child labour and modern slavery norms has been covered in the June 2020, May 2021, May 2022, May 2023 and May 2024 courses, with over 99.7% of eligible employees completing the course by the required deadline. Our May 2024 Code of Ethics course again underscored the importance of ensuring compliance with child labour and modern slavery legislation in our supply chain.

Our effectiveness in combating slavery and human trafficking

Modern Slavery risk is fluid, and our approach must continue to evolve to meet the risk. To ensure we are taking a programmatic approach to address this important risk, in 2022 Orbia officially appointed its Chief Compliance Officer to lead its Anti-Modern Slavery program. In 2023, Orbia staff members participated in the United Nation's Business & Human Rights Accelerator Program, a six-month training program focused on building effective human rights programs. In 2024, we focused on implementing Orbia's Supplier Code of Conduct. In addition, we continue to educate our workforce about the importance of speaking up if they see violations of our Code of Ethics, our policies and the law, including suspected violations of child labor and modern slavery laws.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2024. It was approved by the board on the date of signature below.

Mandy Gent, Financial Director UK **Date:** 30 Oct 2025
On Behalf of Mexichem Speciality Compounds Limited

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Revision Nº	Description	Date
1	Creation of Document	1st Nov 2016
2	Reviewed for new financial year	16th April 2017
3	Reviewed for new financial year	5th April 2018
4	Reviewed for new financial year	20th July 2020
5	Reviewed for new financial year, change of owner & number of employees	12th Aug 2021
6	Reviewed for new financial year, added additional comments for Orbia and made it UK business statement	16th Sept 2022
7	Statement aligned with global statement	27th Sept 2023
8	Review statement for 2023 financial year	17th May 2024
9	Full review with stake holders and comments highlighted in yellow	30th Oct 2024
10	Full review with stake holders for year 2024	25th Oct 2025