Modern Slavery & Human Trafficking Policy Statement

1. PURPOSE

This statement sets out SNF's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 January 2023 to 31 December 2023 and is approved by the Board of Directors.

As part of the chemical industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking and is consistent with the disclosure obligations under the Modern Slavery Act 2015.

2. ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

This statement covers the activities of SNF (UK) Ltd, SNF Oil & Gas Ltd & SNF International Ltd. SNF UK is a subsidiary of SNF SA, a global chemical manufacturer based in Andrezieux, France. SNF SA is a signatory of the UN Global Compact and publishes an annual CSR report. SNF UK operates in line with Group policies with respect to Anti-Slavery.

SNF UK manufactures and distributes chemicals to aid the preservation of natural resources in water intensive industries, principally municipal water & wastewater treatment, paper production, mining and minerals extraction and oil production.

SNF UK's operations – manufacturing, sales, technical service and administration - are solely based in the UK. Raw Materials (mainly oil derived) and finished goods are supplied to SNF UK from other SNF group companies and 3rd part suppliers based mainly in the UK & EU.

SNF UK outsource the following key operations: warehousing & distribution of chemicals, some niche chemical manufacturing and the fabrication of chemical doing systems used by our customers.

SNF UK sell predominantly in the UK, but also in Europe, ME & Asia.

3. RESPONSIBILITIES

Responsibility for the organisation's anti-slavery initiatives is as follows:

- Policies: The policy owners are responsible for putting these in place and reviewing periodically.
- Risk assessments: SNF UK operate to ISO 9001, 14001 and 45001 standards
- Outsourced activities: all UK operations, are audited via questionnaire plus physical/remote audits as appropriate based on perceived business risk. Questionnaires/Audits cover Anti-Slavery within the outsourcers UK operations and their extended supply chain with particular reference to countries at higher risk of modern-day slavery.

4. DUE DILGENCE

SNF is committed to ensuring that there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain.

SNF applies reasonable due diligence to risk assess our supply chain and use the following mechanisms to do this, and will continue to do the following:

- Operate a purchasing process to maintain an approved suppliers list.
- Conduct a periodic risk assessment of our suppliers to highlight areas of risk with modern slavery.
- Communicate with higher risk suppliers via a supplier review questionnaire to understand what actions they are taking to eliminate the risk within their business/supply chain. Results of the questionnaire are assessed, and further actions are taken, where required.
- Ensure that new suppliers have a modern slavery policy or, where applicable, conform to the Modern Slavery Act 2015

5. RELEVANT POLICIES

SNF UK operates the following policies that identify modern slavery risks and steps to prevent slavery and human trafficking in its operations

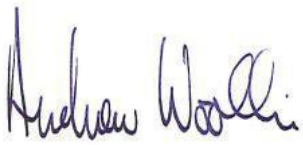
- Whistleblowing policy: The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- Employee code of conduct: The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

6. TRAINING

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training is provided as necessary. The code of conduct is rolled out during the company induction. Equal opportunities and diversity training sessions and briefings are also held annually.

Anyone who suspects modern slavery is advised to report suspicions to their line manager or HR department or report this to the Modern Slavery Helpline on 08000 121 700.

The Board of Directors will review and approve this policy at the end of the financial year and revise where necessary.



Andrew Woollin
Group Managing Director
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