

## GROUP MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

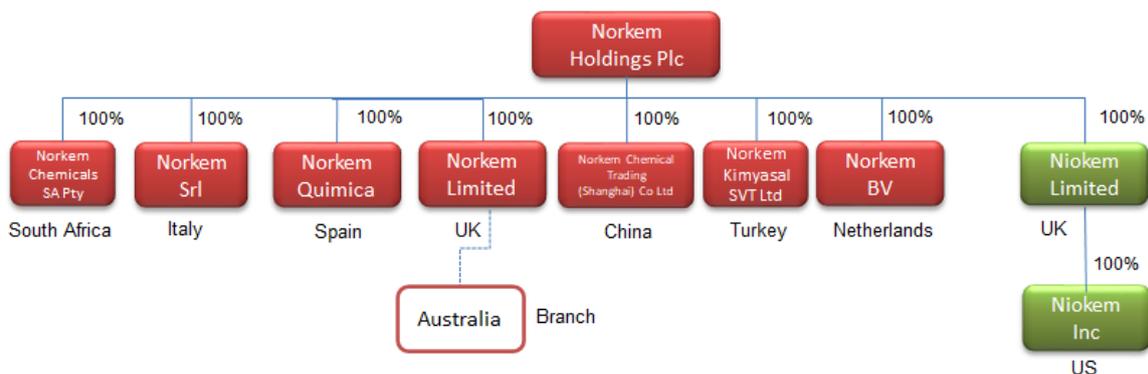
Norkem Holdings Plc, hereinafter referred to as Norkem, fully supports the aims of the Modern Slavery Act 2015 to eradicate human slavery and trafficking. Norkem strives to ensure that no child labour, servitude of any kind or human trafficking has been involved in the supply and distribution of our products or services.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps Norkem have already taken, and continue to take, to ensure that modern slavery or human trafficking is not taking place in our business or supply chains.

### Our Business

Norkem Holdings Plc is a parent company consisting of the following trading subsidiaries:

- Norkem Limited, UK & Australia
- Norkem B.V., The Netherlands
- Norkem Quimica, Spain
- Norkem S.r.l., Italy
- Norkem Kimyasal Maddeler Sanayi ve Ticaret Ltds Sti, Turkey
- Norkem Chemicals SA Pty, South Africa
- Norkem Chemical Trading (Shanghai) Co Ltd, China
- Niokem Limited, UK
- Niokem Inc, USA



### Supply Chain

As a supplier of globally sourced products and services to a broad spectrum of industries including food, pharmaceutical, cosmetics, feed, chemical and construction, Norkem is committed to working proactively with its supply chain, to ensure that the welfare of workers and labour conditions meets the elements of the ETI (Ethical Trading Initiative) “Base Code” and relevant ILO (International Labour Organisation) Conventions.

We have excellent long-standing relationships with suppliers. Norkem commits itself to practical and sustainable improvements to worker welfare and conditions. Although Norkem do not own any of the sites that we source from, we recognise we have a shared responsibility to ensure working conditions within the supply chain meet our standards.

As part of our due diligence all new suppliers and sub-contractors are approved before use by the QHSE department often via questionnaires, which now include questions based on the ETI base code. Many of our products are now regularly assessed for vulnerability risks such as fraud and malicious contamination, within these assessments the QHSE team investigates whether there are any factors which may increase the likelihood of unethical practice e.g. personal gain, value of the product, demand for the product, victimisation factors and the level of competition. The level of corruption within a product’s country of origin is also considered in the vulnerability assessment using the Corruption Perceptions Index (CPI). The CPI is a composite index, a combination of 13 surveys and assessments, it is the most widely used indicator of corruption worldwide. Suppliers and sub-contractors may also be audited by Norkem’s trained auditors who have received advanced Modern Slavery Awareness training in order to recognise and identify potential signs of modern slavery.

Norkem Holdings have been a member of EcoVadis, a provider of business sustainability ratings, intelligence and collaborative performance improvement tools for global supply chains for several years. EcoVadis work to assess and improve sustainability performance in order to protect brands, foster transparency and innovation, and accelerate growth. Norkem’s head office (UK) has also been a member of SEDEX since mid-2018, an international not-for-profit membership association which provides companies with an online platform to share data and measure compliance covering the following areas; labour standards, health and safety, the environment and business ethics. Joining both EcoVadis and SEDEX further reassures our customers that we are meeting the ethical guidelines for global businesses by offering greater transparency of social audits. SEDEX audits cover the following principles:

- Employment is freely chosen
- Respect to Freedom of Association
- Working conditions are safe and hygienic
- Child labour should not be used
- Regular employment is provided
- Minimum living wages are paid
- Working hours are not excessive
- No discrimination is practiced
- No harsh or inhumane treatment is allowed

### Policies on Slavery and Human Trafficking

Modern slavery or human trafficking will not be tolerated in our business or supply chains. We may terminate a contract at any time should any instances of modern slavery or human trafficking come to light.

Norkem follow strict companywide policies including:

- Social responsibility
- Equality policy
- Confidential whistle blowing policy
- Anti-Bribery and Anti-Corruption policy (updated in 2021)

### Training and Awareness

Norkem has conducted companywide awareness training regarding modern slavery and human trafficking and our employees are encouraged to whistle blow as per our whistle blowing policy should any suspicions arise. All new Norkem employees are made aware of the above policies during their induction to the company. Any Norkem employee who audits suppliers or sub-contractors has been given advanced Modern Slavery Awareness training to recognise and identify potential signs of modern slavery and also advice on how to proceed if it is suspected within our supply chain. Due to the COVID-19 pandemic Norkem's training has been reworked to be able to be completed remotely, if necessary, to ensure employees have the most relevant up to date training whilst working from home or in a socially distanced manner.

In 2021 Norkem introduced a new Anti-Bribery and Anti-Corruption policy which all employees have signed and agreed to adhere to. Norkem has a zero-tolerance position for bribery and corrupt activities. We are fully committed to acting in a professional and fair manner, with integrity in all business dealings and relationships wherever we operate.

### The Future

Norkem will continue to review our policies, procedures and training to ensure they reflect our commitment to prevent modern slavery and human trafficking within our business and supply chain. We will maintain open communication within our business and supply chain in order to share knowledge and may update our policies, procedures and training as and when new information is brought to our attention. Norkem will periodically review the effectiveness of the steps taken, which include annual reviews, third party audits and an on-going monitoring system of our suppliers and sub-contractors.

Modern slavery and human trafficking are taken seriously by all Norkem employees including Senior Management. Issues are dealt with swiftly by our QHSE team with the assistance of management, and a section of each annual Management Review Meeting is reserved for further discussion of any issues that have arisen regarding modern slavery and human trafficking throughout the year, including any suggestions for improvement or internal concerns.

This statement was approved and authorised for issue by the Board of Directors of Norkem Holdings and has been signed on its behalf by:

*Alan Nicholson*

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Alan Nicholson

Chairman

Date: 4<sup>th</sup> January 2022