

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 modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking.

Our structure and business.

The Sibelco group is a global material solutions company: Sibelco sources, transforms and distributes specialty industrial minerals- particularly silica, clays, feldspatics and olivine and is the leader in glass recycling. Sibelco serve industries as diverse as glass, ceramics, construction, coatings, polymers and water purification. With around 5.300 employees, the Sibelco group operates over 100 mines, plants, sales offices and distribution warehouses in around 31 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 then 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 **Code of Conduct** which is an important component in our supplier selection and evaluation process and compliance with the 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 following webpages:

<https://www.sibelco.com/sustainability/priority/human-rights-business-ethics - Sibelco Code of Conduct>

<https://www.sibelco.com/wp-content/uploads/Sibelco-Global-Purchase-Terms-Conditions-03.2020-EN.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 **Sibelco 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 behavior, 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 behavior when operating abroad and managing our supply chain. The Sibelco Code of Sustainable Conduct can be consulted on: <https://www.sibelco.com/sustainability/priority/human-rights-business-ethics - Sibelco Code of Conduct>

Among the other policies that we consider give us strength in avoiding modern slavery or human trafficking under the Act in our businesses, are Sibelco's Code of Conduct and our **Whistleblowing Policy**. We speak up against any form of harassment, discrimination, or intimidation. Sibelco prohibits all forms of forced labour or child labour in all its operations. We respect freedom of association and collective bargaining. We respect and promote human rights consistent with the UN Guiding Principles on Business and Human Rights and the ten principles of the UN Global Compact.

We encourage all employees, customers, and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We value feedback and we invite to speak up when someone encounters behaviour in the workplace that is unethical, illegal or goes against the Sibelco values or our Code of Conduct. We provide confidential points of contact to protect the identity of whistleblowers. There is the possibility of approaching the line manager or a member of Human Resources representatives, Internal Audit or the Legal Team. We also provide an independent global reporting service or a reporting line (convercent.com/report).

We have a no tolerance approach for retaliation. We value our employees help in uncovering possible misconduct. We will not tolerate threats or retaliation against anyone who makes a good-faith report or participates in an investigation.

There have been no breaches or suspected breaches related to Modern Slavery and Human Trafficking reported in 2021.

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 program.

We undertake bi-annual enterprise risk assessments, 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 Code during on-boarding. The purpose of the training is to offer practical insights and explain concretely how the Code 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 December 31st 2021.

Signed for and on behalf of Sibelco UK Ltd on June 21, 2022

Director: Mark James

Signature: M.C. James

