

ELEMENTIS PLC**MODERN SLAVERY ACT STATEMENT**

Year ending 31 December 2023

INTRODUCTION

This statement is made pursuant to our obligations under section 54 of the UK Modern Slavery Act 2015 and sets out the steps we have taken, during the 52 weeks ended 31 December 2023, to prevent modern slavery and human trafficking in our business and supply chain¹.

OUR COMMITMENT

Elementis plc (“Elementis”, “we”, “us”, “our”) is committed to high standards of ethics and integrity in all our business dealings and operations. We recognise that modern slavery and human trafficking are serious global issues which require vigilance and attention. This report outlines the steps taken by Elementis in 2023 to address these risks. It is our policy to comply with all applicable laws, including the Modern Slavery Act 2015, and we are committed to ensuring there is no slavery or human trafficking in our organisation.

We are a signatory of the UN Global Compact, and fully support the ten principles (listed here) which cover fundamental responsibilities in the areas of Human Rights, Labour, Environment and Anti-Corruption.

Our website contains information on our approach to [Responsible Business](#) and [Ethics & Compliance](#).

OUR ORGANISATION

We are a global specialty chemicals company that supplies performance-driven additives which help create innovative formulations for consumer and industrial applications. We are engaged in mining raw materials, innovation, manufacturing and marketing products. Our business segments in 2023 were Performance Specialties (comprising our Coatings, Energy, and Talc businesses) and Personal Care. Our key sites are in Brazil, China, Finland, Germany, the Netherlands, Taiwan, the UK and the US. Elementis plc is the parent company of the Elementis group of companies (the “Group”). Further information regarding our business model can be found on our website www.elementis.com and in our Annual Report available [here](#).

As at 31 December 2023, the Group employed around 1300 people. In 2023, Group revenue was \$713.4m. Elementis plc is listed on the London Stock Exchange and is a constituent of the FTSE 250 and FTSE4Good indices.

We remain committed to preventing all aspects of modern slavery, and recognise that we have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. We are aware that manufacturing is one of the five key risk sectors accounting for nearly one-fifth of all forced labour exploitation of adults² and that mining is also a smaller, but significant, risk area. In terms of supply chain, we deal with a large number of suppliers. Of our ten largest suppliers, which account for a significant portion of total spend, only three of these

¹ Elementis plc and Elementis UK Limited fall within the scope of section 54 of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

² See [Global Estimates of Modern Slavery 2022](#) by ILO, Walk Free and IMO

are outside the US and Western Europe. In 2023, we also assessed our 2022 direct material supplier base and found 23% of our spend was with 28 suppliers which had been assessed as having an Ecovadis Gold, or higher, rating, indicating that they had a higher level of maturity and lower level of risk. We continue to actively develop ways to systematically integrate such supplier sustainability risk analysis into our business systems.

We comply with all applicable local labour laws and respect rights such as freedom of association and collective bargaining. We provide fair conditions for all our employees including terms and conditions of employment, market-related pay and benefits, working hours and holiday entitlement. We verify that the individual has the correct right to work documentation. Temporary workers are employed via staffing agencies, which are required to comply with all regulations and laws applicable to our agreements with them. In the UK, our accreditation as Living Wage Employer was renewed by the Living Wage Foundation in May 2023, meaning that we continue to meet the standards set by Citizens UK and the Living Wage Foundation.

OUR CODE OF CONDUCT

Our Code of Conduct, entitled “Integrity is our Specialty”, sets out our approach to acting fairly and ethically in our business. A copy of the Code can be accessed [here](#). Our Code specifically addresses human rights and makes it clear that we prohibit all forms of slavery, and are committed to keeping such practices out of our global supply chain. Our Code clearly states that the use of forced or child labour is against the law and against our Values. Preventing modern slavery and protecting human rights is fundamental to how we operate. Our Code provides guidance on making ethical decisions and encourages people to speak up about concerns, with a variety of channels available to do so, including via an independently run hotline, available 24/7 in multiple languages. Elementis has a zero tolerance approach to retaliation against anyone who raises a concern in good faith.



NEW THIRD PARTY SCREENING SYSTEM IMPLEMENTED

In 2023, we implemented a new third party business integrity screening system. A key reason for our decision to procure, adopt and integrate this new system into our business processes was to enable us to screen third parties for human rights, modern slavery and forced labour concerns. Training and guidance documents were provided to support the launch of this new process.

NEW POLICY ON CUSTOMER AND SUPPLIER SCREENING

Our new Policy on Customer and Supplier Risk screening was developed to support the launch of our new screening system. It explains the importance of screening in managing legal and ethical risks, including human rights risks such as forced labour.

NEW BUSINESS PARTNER CODE OF CONDUCT

We also launched our first Business Partner Code of Conduct, setting out the expectations we have of our suppliers and other third parties with which we work. This is now also incorporated by reference in our standard terms and conditions. The Business Partner Code is available on our website [here](#) in English and Chinese languages.

NEW PROCUREMENT POLICY

Our new Procurement Policy includes a set of Procurement Principles which includes a commitment to Ethical Conduct in procurement and cross-references the Business Partner Code of Conduct. It provides that supplier selection for direct spend will include evaluation of the supplier's alignment with our Values. Furthermore, we require suppliers to comply with applicable local and international laws, regulations, and industry standards.

TRAINING

In July 2023, we launched e-learning training on modern slavery to further enhance employee understanding of these risks. This was linked with the launch of the new screening process described above, to ensure the role of screening in managing modern slavery risks was well understood.

RESPONSIBLE BUSINESS

We have an ongoing Responsible Business project to strengthen our risk assessment and risk management in our supply chain. **Building on our new Business Partner Code of Conduct and enhanced supplier screening system, we are committed to improving supply chain transparency, improving how we assess and manage sustainability risks in the supply chain, and partnering with suppliers who share our commitments.**

CONSIDERATION OF UFLPA RISKS

In October 2023, the Ethics & Compliance Council reviewed statistics relating to enforcement of the US Uyghur Forced Labor Prevention Act and considered the risks in relation to our supply chain. We are undertaking ongoing work in relation to the risks of forced Uyghur labour in supply chains particularly for products or materials entering the US from China.

OTHER SUPPLIER CHECKS AND VISITS

We continue to carry out paper and online checks on key direct suppliers, including checking their position on modern slavery. A supplier questionnaire, including questions relevant to modern slavery, was sent to vendors predominantly in China. In 2023, we conducted site visits to 12 key suppliers to better understand their operating environment and potential risk areas. One of these suppliers was in a high risk location, and we carried out an audit, which included

IN DETAIL: BUSINESS PARTNER CODE

Our new Business Partner Code of Conduct is a key part of our commitment to ensuring the protection of human rights and preventing modern slavery throughout our supply chain.

The Business Partner Code sets out our expectations of our Business Partners including:

- No Child Labour, and Protection for Young Workers
- No Forced Labour or Human Trafficking
- Treating Workers with Respect and Dignity
- Working Hours limits
- Fair Wages, Benefits and Terms of Employment
- Workplace Diversity, Equality and Inclusion
- Freedom of Association
- Effective Grievance Procedures

It also provides details of our whistleblowing hotline, *IntegrityCounts*, and encourages reporting of any concerns.

checking specifically for indications of child or forced labour during the site visit. No indicators were noted during the visit. We also checked written information and documentation on the supplier's policies on human rights and non-use of child labour in advance of the visit to ensure alignment with our requirements.

In 2023, we engaged with our key palm oil derivative suppliers (see below) to better understand their processes for managing slavery and labour risks further upstream in the supply chain in the palm-derivative supply chain, receiving satisfactory responses.

CONFLICT MINERALS

Using the conflict minerals reporting template from the Responsible Minerals Initiative, we confirmed there was no conflict mineral risk associated with the small quantity of tin-containing chemicals we purchase in the UK and China.

NO CONCERNS RAISED ON MODERN SLAVERY IN 2023

No reports were received via our IntegrityCounts hotline or other speak up channels regarding modern slavery or human rights concerns.

EXTERNAL ASSESSMENTS VALID IN 2023

Ecovadis



In 2023, we achieved an Ecovadis Gold rating for the third year in a row. Our improved score reflects our determination to continually minimise our environmental impact, protect human and labour rights, keep each other safe, maintain a responsible supply chain and conduct our business with the highest ethical standards. Our Ecovadis certificate can be viewed [here](#).

FTSE4Good

We remain part of the FTSE4Good, a leading global responsible investment index. We are recognised as having met the corporate responsibility criteria for inclusion in the membership of the index, which is reviewed on an annual basis, and have been a member since 2009.

Roundtable on Sustainable Palm Oil (RSPO)

We support the use of certified sustainable palm oil and derivatives. Our Livingston, UK site purchases palm oil derivatives for use in certain products. The site is third-party certified to the RSPO Mass Balance Supply Chain Model.

This statement was approved by the Board of Directors on 28th February 2024 and signed by our Chief Executive Officer, Paul Waterman.

Paul Waterman CEO

28th February 2024