

**ELEMENTIS PLC<sup>1</sup>****MODERN SLAVERY ACT STATEMENT**

Year ending 31 December 2025

**I. INTRODUCTION**

This Modern Slavery Act Statement, prepared in accordance with Section 54 of the UK Modern Slavery Act 2015, outlines the steps Elementis plc (“Elementis”) took during 2025 to prevent modern slavery, forced labour, and human trafficking across our operations and global supply chain.

We recognise our responsibility to identify, mitigate, and prevent human rights risks, and we remain deeply committed to continuous improvement. Our approach is grounded in our double materiality assessment and aligned with leading sustainability frameworks, including ISSB standards.

**II. OUR COMMITMENT TO HUMAN RIGHTS**

Elementis is committed to upholding high ethical standards and respecting human rights in all aspects of our business. We align with the Universal Declaration of Human Rights, the International Labour Organization’s (ILO) Core Conventions, and the UN Guiding Principles on Business and Human Rights. 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. We disclose policies, actions and metrics relating to compliance matters through our Annual Report.

**III. STRUCTURE, OPERATIONS AND SUPPLY CHAINS**

We are a global specialty chemicals company supplying performance-driven additives for consumer and industrial applications. We have key operations in Brazil, China, Germany, Portugal, Taiwan, the UK and the US. As at 31 December 2025, the Group employed around 989 people; Group revenue was £444.18m<sup>2</sup>. Elementis plc is listed on the London Stock Exchange and is a constituent of the FTSE 250 and FTSE4Good indices. Further information regarding our business model can be found on our website [www.elementis.com](http://www.elementis.com) and in our Annual Report available [here](#).

We remain committed to preventing all aspects of modern slavery, and recognise that we have a responsibility to be alert to the risks in our business and in the wider supply chain. We are aware that manufacturing is one of the five key risk sectors identified by the ILO, accounting for nearly one-fifth of all forced labour exploitation of adults<sup>3</sup>, and that mining is a smaller, but also 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 are outside the US and Western Europe.

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 individuals have the correct right to work documentation. Temporary

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<sup>1</sup> 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 and the California Transparency in Supply Chains Act of 2012.

<sup>2</sup> \$597.5m

<sup>3</sup> See [Global Estimates of Modern Slavery 2022](#) by ILO, Walk Free and IMO

workers are employed via staffing agencies, which are required to comply with all laws and regulations applicable to our agreements with them. In the UK, our accreditation as a Living Wage Employer was renewed by the Living Wage Foundation in May 2024, meaning that we continue to meet the standards set by Citizens UK and the Living Wage Foundation.

#### IV. POLICIES

##### HIGHLIGHTS OF 2025 INITIATIVES

In 2025, we took decisive steps to strengthen our compliance framework by updating key policies that define how we work and uphold our values. Our Code of Conduct was refreshed to reflect global best practices and reinforce our commitment to integrity and respect for human rights. Our Business Partner Code of Conduct was enhanced to set clearer expectations for suppliers, ensuring robust measures to prevent modern slavery and related risks across our supply chain. Alongside these, we advanced policies on anti-corruption, trade sanctions, anti-harassment, and conflicts of interest, further strengthening our foundation for ethical decision-making. These updates were more than procedural – they represent our ongoing effort to make compliance practical, transparent and meaningful, empowering everyone in our organization to act responsibly and with confidence.

##### GLOBAL ANTI-HARASSMENT POLICY

Our Global Anti-Harassment Policy, launched in October 2025, marked a significant step in reinforcing a safe, respectful, and inclusive workplace across all regions. This policy sets clear global expectations for behaviour, prohibits harassment and discrimination in any form, and provides guidance on reporting concerns through confidential channels.

##### 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](#). In 2025, we elevated our compliance culture by delivering a refreshed Code of Conduct that goes beyond a rulebook. It embeds human rights, diversity and sustainability at the heart of how we work. This update strengthened our stance against modern slavery and further aligned our commitments with global standards, while making guidance more practical and accessible for everyday decisions. We enhanced Speak Up protections, expanded multilingual reporting channels, and connected compliance principles directly to our corporate values, ensuring they resonate across all regions. Plans are already underway for a further update in 2026, designed to align with our CEO’s vision and the Elevate Elementis strategy, bringing ethics and innovation together in a way that will set a new benchmark for responsible business.



##### BUSINESS PARTNER CODE OF CONDUCT and PROCUREMENT POLICY

Our Business Partner Code of Conduct, first introduced in 2023, continued to evolve throughout 2025 to strengthen accountability and transparency across our supply chain. The Code now includes enhanced provisions on human rights, modern slavery prevention, and ethical business practices, requiring suppliers to implement robust internal controls and demonstrate compliance with international standards. It remains embedded in our standard terms and conditions and is available in English and Chinese to ensure accessibility.

In parallel, our procurement policy was reinforced in 2025 to align with these updates and our broader compliance priorities. Supplier selection now places greater emphasis on ESG

performance and risk screening, supported by advanced due diligence tools and contractual safeguards. These measures ensure that procurement decisions reflect our values and commitment to ethical conduct, sustainability and legal compliance across all regions.

## **SANCTIONS GUIDANCE**

In April 2025, we updated our Sanctions Compliance guidance, including the release of a new Quick Guide designed to make complex requirements easier to understand and apply in day-to-day operations. This update provides clear, practical guidance on screening obligations, restricted party checks and escalation procedures, ensuring employees can act confidently and in compliance with international trade regulations. By simplifying critical information and reinforcing accountability, the revised guide strengthens our ability to manage sanctions risks effectively across all regions.

## **V. RISK MANAGEMENT and DUE DILIGENCE**

We make efforts to identify and assess material impacts, risks and opportunities across our own operations and the value chain, including through stakeholder engagement, risk scoring, escalations and remediation channels for workers (internal and external).

We updated our Double Materiality Assessment, confirming that the risk of forced and child labour was relevant to our business, both for our own workforce and for workers in the supply chain. Other working conditions are also material subjects, such as adequate wages, equal treatment and opportunities for all, secure employment, social dialogue, freedom of association, health and safety, training and skills development, and other work-related rights.

We continuously work to understand the impacts, risks and opportunities we have in these areas. Appropriate actions are identified as part of our strategy to drive the business in a more sustainable and resilient way.

Our risk management framework identifies priority risks and sets oversight cadence; our due diligence processes translates those risks into actions during onboarding, contracting, and ongoing monitoring of third parties.

## **CONSIDERATION OF UFLPA RISKS**

In 2025, enforcement of the Uyghur Forced Labor Prevention Act (UFLPA) intensified significantly. The U.S. Forced Labor Enforcement Task Force expanded the Entity List to 144 companies, adding 78 new entities linked to forced labor, and designated five new high-risk sectors including caustic soda, copper, lithium, red dates and steel. In response, we strengthened our risk assessment processes, mapping supply chains beyond tier one and implementing enhanced screening for suppliers in higher-risk geographies.

## **RESPONSIBLE BUSINESS**

We have an ongoing Responsible Business project to strengthen 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.

## **IMPLEMENTATION OF ENHANCED THIRD PARTY SCREENING SYSTEM AND POLICY**

To strengthen our ability to identify and mitigate risks related to human rights and modern slavery, we rolled out an advanced **Third-Party Integrity Screening System** in 2023. This cutting-edge tool

operates seamlessly across all business segments, enabling comprehensive risk assessments of third parties based on their geographical location, business practices and historical compliance data.

Our 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.

#### Key Achievements in 2025:

- a) **Screening Coverage:** 225 new suppliers were onboarded.
- b) **Identified Risks:** We onboarded one high-risk third party, for Chile. This was due to group-level environmental and regulatory challenges and lack of comprehensive information.
- c) **Mitigation Approaches:** To mitigate risks, we reinforced several key strategies:
  - Enhanced and continuous monitoring
  - Sanctions assurance letters and enhanced contractual safeguards
  - Regular risk review assessments.
- d) **Training Impact:** In 2025, broader training initiatives were implemented, including the "Anti-Bribery and Corruption" and "Sanctions" programmes, for which the completion rate was above 80%. This training emphasised the importance of risk screening within the broader ethical compliance framework.

This initiative has progressively improved transparency across our supply chain, enabling us to proactively address potential risks before they escalate into potential compliance violations.

#### SUPPLIER ESG TRANSPARENCY

We use external independent tools to help us to choose business partners, and to evaluate their alignment with Elementis' requirements and the risks and opportunities that they bring to our business.

We leverage EcoVadis as a key component of our supplier ESG program. With this tool, we can evaluate supplier performance across four ESG pillars: Environment, Labor & Human Rights, Ethics, and Sustainable Procurement. The standardised scoring system enables us to benchmark suppliers globally and identify areas for improvement. By integrating EcoVadis ratings into our procurement decisions, we ensure transparency and accountability, prioritising partnerships with suppliers who demonstrate strong ESG practices and a commitment to continuous improvement.

#### OTHER SUPPLIER CHECKS AND RISK ASSESSMENTS

In 2025, we continued to strengthen our oversight of suppliers in higher-risk areas, focusing on responsible sourcing and alignment with our human rights standards. While most assessments confirmed compliance with our requirements, we recognise that certain raw materials, such as tin, present inherent challenges in achieving full traceability. We remain committed to managing these risks through ongoing engagement with suppliers, enhanced monitoring, and adherence to internationally recognised frameworks. Our approach reflects transparency and continuous improvement as we work to uphold ethical practices across our supply chain.

## VI. TRAINING

### TRAINING PROGRAMMES

In 2025, we introduced a coordinated programme of in-person ethics and compliance training for plant workers, expanding beyond digital learning to face-to-face sessions. This marked a major step forward in how we engage with operational teams. Delivering training in person allowed for

clearer communication, immediate interaction, and practical discussion of real-world scenarios, which significantly strengthened understanding and application of compliance principles on the shop floor. Sessions were successfully completed at Livingston and Taloja, and at our Shanghai Songjiang Plant, reinforcing our commitment to making compliance meaningful and effective for those closest to production.

Over 80% of employees participated, demonstrating our collective dedication to identifying and mitigating risks within our operations and supply chain.

In 2025, we strengthened engagement through a tailored web-based training for the Code of Conduct, launched globally via our learning platform. Completion rates reached 87% by year-end, demonstrating strong adoption across regions. Alongside this, we introduced thirteen new web-based trainings covering critical topics such as sanctions, Speak Up culture, anti-harassment and discrimination, conflicts of interest, and greenwashing. Earlier in the year, we also delivered a one-hour session on confidentiality and trade secrets in partnership with an external expert, and provided a tailored anti-corruption training in Portugal to meet local legislative requirements. These initiatives reflect our commitment to equipping employees with practical knowledge to uphold compliance and ethical standards across all areas of our business.

## VII: OTHER INFORMATION

### ANNUAL CONFLICTS OF INTEREST DECLARATION

At the end of 2024, we introduced a centralised disclosure system to strengthen transparency and ethical governance across Elementis. This platform provides a simple, standardised way for employees to register, update and track potential conflicts of interest, supported by automated reminders and real-time monitoring. By February 2025, 970 employees had submitted their annual declaration, representing a 92% completion rate.

This implementation is an important step forward. It enhances visibility and accountability, reduces decision-making risks, and reinforces a culture of integrity aligned with our values. The system also enables year-on-year benchmarking and early identification of emerging risks, ensuring that compliance oversight is both proactive and effective.

In 2025 the annual declaration was launched in the first week of November and we again aim to have a completion rate exceeding 90%.

### CONFLICT MINERALS

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

### RAISING CONCERNS

We provide secure and confidential channels for employees and external parties to raise concerns, including our [Speak-Up hotline](#), which is available in multiple languages and supported by non-retaliation protections. These channels are designed to ensure that concerns related to human rights, modern slavery, ethical conduct, or other compliance matters can be raised safely and addressed appropriately. We continue to promote awareness of these mechanisms across all regions.

### EXTERNAL ASSESSMENTS IN 2025



In 2025, we achieved an EcoVadis Silver rating, Our 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,

### *FTSE4Good*

We remain part of 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.

## VIII. LOOKING AHEAD

Our priorities for 2026 focus on further enhancing supply chain transparency, strengthening due diligence, and advancing responsible business practices:

- Deploy AI driven analytics to anticipate risks proactively.
- Further strengthen our third-party due diligence and risk management practices.
- Deepen engagement with suppliers in higher-risk regions.
- Enhance multi-tier supply chain traceability.
- Deliver our global Ethics & Compliance Week, continuing the biennial programme last delivered in 2024.

These actions reflect our unwavering commitment to ethical practices, transparency and continuous improvement. Together, we will ensure Elementis remains a leader in integrity, sustainability and human rights.

This statement was approved by the Board on **25 February 2026** and signed by **Luc van Ravenstein, Chief Executive Officer**. It will be published on our website with a link from the homepage and uploaded to the UK Modern Slavery Statement Registry.

A handwritten signature in black ink, appearing to read 'Luc van Ravenstein', written over a horizontal line.

**Luc van Ravenstein, CEO**

**25 February, 2026**