

KOCH CHEMICAL TECHNOLOGY GROUP LIMITED UK MODERN SLAVERY ACT DISCLOSURE

Koch Chemical Technology Group Limited and its affiliates (together, “KCTG”) are committed to conducting all business lawfully and with integrity. KCTG’s commitment to and expectations for ensuring that our business and supply chain is maintained in a lawful and socially responsible way includes, among other things, that neither human trafficking nor slavery/forced labor is taking place in any part of our business, and that our suppliers do not use slavery/forced labor in any of its forms, including human trafficking, to produce the products they provide to KCTG. KCTG’s zero tolerance for slavery/forced labor and human trafficking compliance and ethics expectations are set out in the KCTG [Code of Conduct](#), compliance standards, and in training and other communications we provide to our own employees, officers, advisers, agents and representatives. In addition, before we select our suppliers and other third parties, we carry out pre-supplier checks in accordance with KCTG policy.

Supplier/Supply Chain Management

Evidence of the management of our compliance and ethics expectations in relation to human trafficking and slavery/forced labor in our supply chains, can be found in our Code of Conduct, page 12, which states:

COMMITMENT TO LAWFUL EMPLOYMENT PRACTICES

Our companies strive to make people’s lives better through the products we make, support for the communities in which we live and work, maintaining quality work environments, and sourcing responsibly. We are committed to adhering to applicable employment and labor laws everywhere we operate. This includes observing those laws that pertain to child labor, forced labor, human trafficking, wages and work hours and freedom of association. In addition to other expectations contained in this Code, our commitment to social responsibility specifically includes the following:

Child Labor

The company will not employ underage individuals as defined by applicable child labor laws.

Employees will not be permitted to work in a position where they are younger than the minimum legal age for employment in that job.

Forced Labor

The company does not support the use of forced labor or involuntary prison labor. Recruiting and selection activities are conducted in compliance with applicable law and any applicable collective bargaining obligations.

Supplier Audits

KCTG does not have a KCTG-wide supplier audit program. Supplier audit practices vary within our companies – for example, those companies that conduct audits may do so either internally or via independent, external auditors. The scope of the supplier audits cover the company’s standards and guidelines (including those regarding forced labor), as well as broader social responsibility and sustainability policies. In the event an audit reveals supplier non-conformance with our standards and guidelines, depending on the circumstances, we would either require that suppliers establish corrective action plans and report on the implementation of such plans or we would terminate the relationship with that supplier.

Our process for screening of potential suppliers includes such mechanisms to also identify negative publicity in addition to any criminal activity. That information is reviewed periodically on our suppliers to identify any areas of concern which need to be addressed.

Direct Supplier Certification

While many of our commercial agreements require supplier compliance with applicable laws and regulations, KCTG does not have a direct supplier certification process specifically focused on human trafficking and slavery/forced labor. In addition, before we select our suppliers and other third parties, we carry out pre-supplier checks in accordance with KCTG policy.

Accountability Standards

Non-compliance with our standards regarding human trafficking and slavery/forced labor – whether by a supplier or an employee – will result in corrective action, up to and including termination of the relationship, depending on the circumstances. Internal auditors and business representatives would work with suppliers, employees and possibly third-party resources to resolve any instances of non-compliance. All KCTG companies promote a Code of Conduct identifying numerous avenues for reporting compliance concerns, including on an anonymous basis (where allowed by law). Such concerns are objectively investigated under the guidance and direction of our compliance or legal departments. KCTG prohibits retaliation against anyone who, in good faith, raises a concern.

Training on Human Trafficking & Slavery

Although KCTG does not have a comprehensive, mandatory training program focusing on human trafficking and slavery/forced labor, a number of KCTG affiliates provide training to those employees who are directly responsible for human resources, procurement and supply chain management on the subjects of human trafficking and slavery/forced labor, particularly with respect to mitigating risks within the supply chain. Employees receive training on company policies and procedures designed to support a supply chain free of any type of coerced labor and on the methods available for reporting concerns. KCTG companies train employees on the employee Code of Conduct, codes of conduct or standards directed towards suppliers, all of which address prohibition of coerced labor. The training is periodically provided through a variety of delivery methods, including live classroom training, small team meetings and computer-based training.

Verification

Other than the steps and practices described above, KCTG does not have a separate, comprehensive verification process for evaluating and addressing the risks of human trafficking and slavery/forced labor.

This disclosure applies to the practices of Koch Chemical Technology Group Limited and its affiliates (specifically including Hamworthy Combustion Engineering Limited; Koch-Glitsch UK; and Koch Membrane Systems), except those affiliates that have posted their own disclosure statement. This disclosure does not apply to the practices of companies for which Koch Chemical Technology Group Limited may hold a minority stakeholder interest.

The fiscal year for Koch Chemical Technology Group Limited and its affiliates listed above is January 1 to December 31.

This statement is made and reflects the position as at May 1, 2019 through June 1, 2020 and has been approved by the Koch Chemical Technology Group Limited Board of Directors:

Signature: 

Date: April 23, 2019

Name: Kate Caddick, Director

Company: Koch Chemical Technology Group Limited