

Section: **Compliance**  
Unit: **All Units**

*Supersedes*

No.:

Subject: **Anti-slavery and Human Trafficking Policy**

Date:

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## **1. Introduction**

1.1 Slavery is a term used to encompass slavery, servitude, forced and compulsory labor, bonded and child labor and human trafficking. Victims are coerced, deceived and forced against their free will into providing work or services. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Slavery and human trafficking are crimes and violations of fundamental human rights.

1.2 Forms of slavery may include, but are not limited to, withholding of passports, being forced to work against a person's will, depending on the employer for housing, food, and other necessities, being recruited through some form of debt arrangement, such as an advance or loan, and limitations on movement of workers.

1.3 Element Solutions strictly prohibits the use of slavery and human trafficking in our operations and supply chain. We are committed to implementing systems and controls aimed at ensuring that slavery is not taking place anywhere within our organization or in any of our supply chains. We expect that our suppliers will hold themselves and their own suppliers to the same high ethical standards.

## **2. Policy Statement**

2.1 We expect everyone working with us or on our behalf to support and uphold the following measures to safeguard against slavery and human trafficking:

- We have a zero-tolerance approach to slavery in our organization and our supply chains. The prevention, detection and reporting of slavery in any part of our organization and supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and direct suppliers to address the risk of slavery in our operations and supply chain.
- As part of our contracting processes, we include a requirement to comply with our Supplier Code of Conduct, which sets out the minimum standards required to combat slavery and human trafficking.
- Our recruitment procedures require employment and recruitment agencies and other third parties supplying workers to our organization to comply with our Supplier Code of Conduct. Suppliers engaging workers through a third party are also required to obtain third parties' agreement to adhere to the Code of Conduct.

### **3. Policy Application**

3.1 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, affiliates, agency workers, seconded workers, volunteers, interns, agents, contractors, suppliers, manufacturers, third party tollers, external consultants, third-party representatives and business partners.

3.2 This policy does not form part of any employee's contract of employment and we may mend it at any time.

3.3 Workers must ensure that they read, understand and comply with this policy.

3.4 Individual subsidiaries or business units of Element Solutions may develop and maintain their own unique policies to comply with local laws such as the UK Modern Slavery Act or the California Supply Chain Transparency Act, provided such policies do not conflict with this policy.

### **4. Responsibility for the Policy**

4.1 The operations department has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about this policy, and auditing internal control systems and procedures to ensure they are effective in countering slavery and human trafficking.

4.2 Management at all levels are responsible for ensuring those reporting to them fully comply with this policy and are provided with adequate periodic training to assess their understanding of slavery and human trafficking issues within supply chains.

### **5. Reporting Slavery and Human Trafficking**

5.1 Employees must notify their manager, operations department or local HR representative as soon as possible if they have any reason to believe that slavery or human trafficking of any form may exist within our organization or our supply chain, or may occur in the future or have any concerns or suspicions relating to compliance with this policy. Alternatively, employees may raise concerns through our Corporate Compliance Hotline. Contact information for the Hotline can be found in the Business Conduct and Ethics Policy.

5.2 If a person, other than an employee, has any reason to believe that slavery or human trafficking of any form may exist within our organization or our supply chain, or may occur in the future or have any concerns or suspicions relating to compliance with this policy, they must notify the operations department of the applicable business unit as soon as possible. Alternatively, they may raise concerns through our Corporate Compliance Hotline. Contact information for the Hotline can be found in the Business Conduct and Ethics Policy.

5.4 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that slavery or human trafficking of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. We have very clear policies prohibiting retaliation against anyone who makes a good faith report. If you believe that you have suffered any such treatment, you should inform the applicable operations department or local HR representative immediately.

## **6. Noncompliance**

6.1 Any employee who fails to comply with this policy will face disciplinary action, up to and including termination.

6.2 We may immediately terminate our relationship with other individuals and organizations working on our behalf if they fail to comply with this policy.