



Statement under the California Transparency in Supply Chains Act of 2010 and the UK Modern Slavery Act 2015 for the Financial Year ending 31 December 2018

The Infineum Group of Companies ("Infineum") is a global organisation which formulates, manufactures and markets petroleum additives for lubricants and fuels. Operations across the Infineum Group of Companies include production facilities at various locations globally, sales representation in more than 70 countries, business centres located in the UK, USA, China and Singapore, and a global supply chain.

Infineum condemns any form of human rights abuse, including human trafficking and slavery, and supports and respects the protection of universal human rights. Infineum's Code of Conduct includes a Statement on Human Rights and Modern Slavery to this effect, and these principles are further reflected in Infineum's Core Policies and Core Values. Infineum employees have an obligation to report to the organisation any violation or suspected violation of the Statement on Human Rights and Modern Slavery of which they become aware. Infineum does not condone human rights abuses by its employees or suppliers, and will investigate reports of abuses and take appropriate action to ensure compliance.

Infineum's Supplier Quality Assurance Process, which applies to suppliers of materials incorporated into Infineum products, makes clear that suppliers are expected to adhere to world-class quality principles, including ethics, integrity and strict compliance with all applicable laws and regulations. The Process specifically communicates Infineum's condemnation of human rights violations and its requirement that suppliers choose the course of highest integrity in their dealings, and that they support and respect the protection of universal human rights. Infineum's purchase order terms and conditions reinforce suppliers' obligation to comply with applicable laws and give Infineum the right to audit their compliance with such laws.

In addition, Infineum's suppliers are reminded annually in writing of Infineum's position in respect of Modern Slavery, and its corresponding expectation that its suppliers will conduct themselves accordingly.

Infineum is certified under the U.S. Customs and Border Protection agency's Customs Trade Partnership Against Terrorism (C-TPAT) program, a voluntary U.S. government program intended to improve supply chain security and thereby, among other measures, prevent human trafficking and slavery throughout the supply chain. Infineum ensures the security of its product supply chain, including with regard to risks of human trafficking and slavery, through its compliance with C-TPAT processes. Infineum expects its suppliers to meet C-TPAT standards of security for products imported into the United States and to use C-TPAT certified carriers or carriers who can demonstrate their ability to meet C-TPAT security criteria.

Infineum conducts periodic compliance trainings for relevant employees, and is currently working towards rolling out a dedicated electronic learning resource on compliance with Modern Slavery laws. This electronic learning resource is expected to be complete during the course of 2019, and would then be available to relevant employees to access at any time.

This statement constitutes both (i) Infineum's slavery and human trafficking statement under the California Transparency in Supply Chains Act of 2010, and (ii) the Modern Slavery Statement (made pursuant to section 54 of the Modern Slavery Act 2015) for Infineum International Limited and its subsidiary Infineum UK Ltd, for the financial year ending 31st December 2018.


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Trevor Russell
CEO, Infineum International Limited

Date: 26th March 2019

For and on behalf of the Board of Directors of Infineum International Limited whose approval of this statement was given on the 25th March 2019.