



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 2024

The Infineum Group of Companies ("Infineum") is a global specialty chemicals organisation whose primary business is formulation, manufacture and marketing of 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, slavery, forced labour and child labour, 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 (this Statement was updated in 2023 to add more explicit statements regarding wages, working conditions, freedom of association, and labour standards), and these principles are further reflected in Infineum's Core Policies and Core Values. Compliance with Infineum's Core Policies is made the responsibility of all employees, and as part of Infineum's Core Values all employees are required to commit to operate at the highest ethical standards. 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, suppliers or business partners, and will investigate reports of abuses and take appropriate action to ensure compliance including corrective action plans or terminating non-compliant supplier relationships if necessary.

Infineum's Supplier Quality Assurance Process, which applies to suppliers of materials incorporated into Infineum products, makes it 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 Supplier Code of Conduct further conveys Infineum's expectations and requirements regarding Human Rights and Labour Practice, while 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 zero-tolerance position in respect of Modern Slavery, and suppliers' responsibility to conduct themselves in compliance with these standards.

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 requires relevant employees to undertake periodic compulsory compliance training which includes a module on compliance with Human Rights and Modern Slavery laws. This training is provided as an electronic learning resource and as such is also available for all employees globally to access at any time. During 2024 Infineum has continued to require its employees and suppliers to operate in accordance with the highest ethical standards, and has maintained its position, policies and processes in that regard. To strengthen its approach and ensure continued effectiveness going forward, Infineum is committed to (i) reviewing and updating its policies and processes to combat slavery, child labour, and human trafficking in its supply chains to align with evolving legislation, and (ii) expanding supplier evaluations and independent verification mechanisms.

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 UK Modern Slavery Statement (made pursuant to section 54 of the UK Modern Slavery Act 2015) for Infineum International Limited and its subsidiary, Infineum UK Ltd, for the financial year ending 31st December 2024.

A handwritten signature in black ink, appearing to read "Aldo Govi". The signature is written in a cursive style with a long horizontal stroke at the end.

Aldo Govi
CEO, Infineum International Limited

Date: 25 March 2025

For and on behalf of the Board of Directors of Infineum International Limited whose approval of this statement was given on the 12th day of March 2025.