

STATEMENT AND POLICY ON HUMAN RIGHTS AND MODERN SLAVERY

The Infineum Group of Companies ("**Infineum**") condemns the violation of human rights in any form and has a zero-tolerance approach to modern slavery, human trafficking, forced labour and child labour. Infineum is committed to respecting human rights as a fundamental principle in its operations. Infineum strives to have a positive influence on its workforce and in the communities where it operates.

This Statement and Policy on Human Rights and Modern Slavery ("**Human Rights Policy**") applies to every Infineum colleague, officer, and director, as well as to every contractor, consultant, agent, distributor and other relevant external stakeholder conducting activities on behalf of or in the name of Infineum.

Infineum's commitment to respecting human rights is integrated into its policies, practices, and expectations and is guided by the goals of universally recognized principles, including those of the:

United Nations Universal Declaration of Human Rights

2011 U.N. Guiding Principles on Business and Human Rights (UNGPs)

International Labour Organization 1998 Declaration on Fundamental Principles and Rights at Work

Modern slavery is a crime in various countries and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking.

Infineum endeavors to ensure that all work carried out for it is voluntary rather than forced and that all employees meet the minimum legal age requirements of the country to work.

Infineum is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing effective systems and controls to ensure human rights abuses or modern slavery are not taking place in its business. As part of its commitment through its supply chain, it expects the same high standards from all its contractors, suppliers and other business partners, and, in turn, expects its suppliers to hold their own suppliers to the same high standards. The Infineum Supplier Code of Conduct can be found in the Supplier Portal section of our website Infineum.com. This expectation is communicated as part of Infineum's Supplier Quality Assurance Process, which applies to suppliers of materials incorporated into Infineum products. Further, 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 has adopted a Code of Conduct which supports its position on human rights. In particular, the Business Ethics Core Policy requires compliance with all applicable laws, and, where the law is permissive, that Infineum will choose the course of the highest integrity. A summary of such policies is available on the Infineum intranet site and also in the Infineum Documents Hub section of the Infineum.com site.

Infineum employees have an obligation to report to the organization any violation or suspected violation of Infineum's Code of Conduct, including suspected human rights abuses by employees, suppliers or business partners. Infineum colleagues, suppliers, and business partners may report suspected violations of Infineum's Code of Conduct or this Human Rights Policy through the Infineum reporting hotline. [Infineum ethics hotline](#) Such reports may be made anonymously. Alternatively, any Infineum colleague may report a suspected violation directly to any Infineum leader or the HR, Finance, or Law Departments. All reports will be investigated, and if a violation is found, appropriate corrective action plans will be implemented. Violations may result in disciplinary action up to and including termination.

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 to access at any time.

The Infineum Core Values also underpin the way Infineum does business. Its Core Value of Ethics requires Infineum to obey all laws and operate within the highest ethical standards. Its Core Value of "Respect for People" is self-explanatory. Infineum values people of different backgrounds, races, genders and cultures and will not tolerate discrimination based on such differences.

Infineum's position regarding human rights and modern slavery can be further defined as follows:

- Infineum supports and respects the protection of universal human rights, including but not limited to those of its colleagues, the communities in which it operates and the parties with whom it does business.
- Infineum condemns human rights abuses of any kind.
- Infineum provides its employees with written and understandable information in their local language about their employment conditions with respect to wages, benefits and working hours.
- Employees shall be paid at least the minimum legal wage or better and receive annual leave and public holidays in accordance with local law.
- Infineum respects its employees' right of freedom of association, including the right to collective bargaining, the right to join a trade union and all other workplace rights as mandated by legislation.
- Infineum shall not tolerate any forced or compulsory labour of any kind. Infineum adheres to minimum employment ages and rejects child labour.
- Infineum shall comply with all applicable laws and regulations regarding working conditions and labour standards. Where local laws are less stringent than the International Labour Organization's (ILO) Fundamental Principles, the ILO's Fundamental Principles will apply.

Infineum condemns any form of human rights abuse and supports and respects the protection of universal human rights. This commitment is re-affirmed annually in a statement from the Infineum CEO which is published on the Infineum.com site.

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