

# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2021





**The UK Modern Slavery Act of 2015, and the California Transparency in Supply Chains Act (SB 657) require Innospec, Inc. to disclose the steps it has taken to address the risk of slavery and human trafficking in its supply chain.**

Innospec Inc., on behalf of itself and its subsidiaries (collectively, “Innospec”), publishes this statement to comply with these Acts. This statement relates to the financial year ending 31 December 2021.

This statement has been approved by the Board of Directors.



**Patrick. S. Williams**  
President and Chief Executive Officer

# Innospec's Business

Innospec is a global specialty chemicals company, supplying products into various markets including agrochemicals, construction, fuel, home care, metal extraction, personal care and polymers and waxes. We currently have operations in 24 countries with approximately 2,000 employees and work with around 16,000 suppliers including vendors, contractors and service providers, many of whom also have their own supply chains. We recognize that being a responsible business is key to our continued success and, as part of that responsibility, we fully support the elimination of all forms of slavery and human trafficking.

## Policies Relating to Modern Slavery and Human Trafficking

**Innospec is committed to the highest standards of corporate governance and ethics. Compliance is a non-negotiable part of our business. As part of our firm commitment to these values we have, and continue to operate, cultivate and refine, a robust ethics and compliance program.**

This commitment is reflected in Innospec's Code of Conduct, Supplier Code of Conduct, Human Rights Policy Statement, Reporting Corporate Governance Concerns Policy, Conflict Minerals Policy and other corporate policies which together set the company's expectations for how the global business conducts its activities.

Innospec's **Code of Conduct** demands that the company's directors, officers and employees (including contract employees) maintain the highest ethical standards in carrying out business activities and requires compliance with all applicable laws, rules and regulations. It specifically addresses modern slavery issues by, among other things, explicitly requiring all directors, officers and employees, and third party representatives of Innospec (including agents and distributors), to comply with all applicable modern slavery legislation (which includes in relation to forced, bonded and child labor and human trafficking) and to promptly report all

concerns and suspicions they may have in relation to the potential for modern slavery in any part of Innospec's supply chain. It also puts contracted third parties on notice that violation of modern slavery laws would constitute a breach of their contract with Innospec and encourages such third parties to report relevant concerns.

Innospec's **Supplier Code of Conduct** applies to all our suppliers and sets out the minimum standards that we expect regarding compliance with all relevant laws and regulations, including those concerned with business integrity, health, safety and the environment and human rights. Specifically, the Supplier Code of Conduct makes it clear that our suppliers must not permit any form of forced, bonded, child labor or human trafficking or any form of unacceptable treatment of their workers, including exploitation of children or involuntary servitude.

Innospec's Code of Conduct, Supplier Code of Conduct, Human Rights Statement, Reporting Corporate Governance Concerns Policy, Conflict Minerals Policy and other corporate policies are available in several languages on our website at <https://innospec.com/about-us/corporate-governance/>.

## Key Developments in 2021

**As part of Innospec’s commitment to the continuous improvement of our corporate governance framework, we updated and strengthened a number of global policies during 2021.**

Our **Conflict Minerals Policy** aims to ensure that we conduct our business in accordance with applicable conflict minerals laws, which are designed to stem the trade in certain metals which fund armed conflict or are mined using forced labor. The policy mandates due diligence processes to promote compliance and sets our expectations of our suppliers to commit to the responsible, conflict-free sourcing of relevant minerals. The policy was updated in 2021 to take account of the new EU Conflict Minerals Regulation, which aims to ensure that importers of relevant minerals into the EU consider conflict minerals related risks, implement supply chain due diligence checks and fulfil specific disclosure obligations.

Innospec also developed and issued a new **Human Rights Policy Statement**. The statement emphasizes our commitment to human rights, including our support of the principles of the United Nations’ Universal Declaration of Human Rights, the United Nations’ Guiding Principles on Business and Human Rights, the International Labor

Organization Principles and the United Nations’ Global Compact. The statement reiterates our commitment to compliance with applicable laws on working time, paid leave and benefits, and that we prohibit any form of forced, compulsory, bonded, child labor, human trafficking or any form of unacceptable treatment of our employees. The Human Rights Statement also clearly sets out that our suppliers are expected to operate to the same high ethical standards.

2021 was also a notable year due to the global COVID-19 pandemic which had a major impact on our employees, customers, suppliers, partners and business operations worldwide. The health, safety and welfare of our employees was paramount throughout the period, as was that of the communities where they work. We responded to global government requirements by accommodating and facilitating home working as necessary, and by recommending and implementing measures across all our businesses to manage infection risk, including improved hygiene measures, the wearing of PPE and social distancing. Guidance was also issued to employees on measures to keep vulnerable employees safe, and COVID-19 cases were isolated and managed appropriately as they occurred.

## Supplier Risk Assessments

**As part of our commitment to human rights, we take steps to identify and minimize the risks of slavery, child labor and human trafficking in our supply chain.**

Suppliers are screened using software that checks debarment, sanctions and watch lists. We also create risk profiles for new suppliers and, where necessary, action plans to mitigate potential supply chain risks.

Innospec engages EcoVadis to conduct corporate social responsibility risk assessments of key suppliers and those operating out of high risk locations. Among other things, EcoVadis assessments allow us to evaluate supplier policies and actions taken by the

supplier and to identify further actions required to enforce compliance with internationally recognized human rights standards and fair labor practices.

In 2021, Innospec extended the scope of its EcoVadis assessment program from raw material suppliers to also include non-raw material suppliers.

Innospec has an internal protocol to support its review of, and response to, concerns raised regarding its supply chain. Innospec may invoke sanctions against suppliers, up to and including termination of the business relationship, if they violate modern slavery laws.

## Supplier Certification

**Because Innospec does not control or direct the activities of its independent suppliers, it seeks assurances from them that they will not violate the law.** Accordingly, Innospec requires its suppliers (through standard terms and conditions of purchase) to confirm that they have complied with all applicable laws and regulations in connection with providing goods and services to Innospec. This includes all applicable anti-slavery, child labor and human trafficking laws.

All Innospec standard terms and conditions of purchase contain a specific provision requiring suppliers to certify compliance with laws prohibiting slavery and human trafficking and adherence with the Supplier Code of Conduct and a provision requiring compliance with applicable US and EU laws and regulations relating to conflict minerals (<https://innospec.com/about-us/corporate-governance/innospec-trading-tcs/>).

## Higher Risk Areas

**Innospec has identified certain parts of its business and supply chains where there is a higher potential risk of slavery, child labor and/or human trafficking, such as the use by Innospec of palm oil and palm kernel oil derivatives in a number of its personal care products.** Since 2013, Innospec has been a member of the Roundtable on Sustainable Palm Oil (RSPO) whose principles stipulate, amongst other things, the fair treatment of workers according to local and international labor rights standards. In July 2015, Innospec achieved RSPO Mass Balance Supply Chain Certification and now maintains current valid certifications at all its relevant manufacturing facilities. Innospec has a Sustainable Sourcing of Palm and Palm Kernel Oil Derivatives Policy (Palm Policy) which includes a statement on the prohibition of forced, slave and child labor and a Palm Grievance Procedure which sets out a clear process for the identification, investigation and resolution of external grievances concerning the implementation of Innospec's Palm Policy, including allegations of modern slavery.

In 2021, Innospec published a Palm Grievance tracker on its website which details the grievances received and the outcome of Innospec's internal investigation.

In addition, Innospec is a member of the collaborative initiative, Action for Sustainable Derivatives (ASD), which aims to develop a harmonized approach to annual supply chain transparency, risk monitoring and evaluation exercises. ASD brings together a number of companies to collectively standardize the tools and methodologies used to accelerate the compliance of their supply chain with NDPE compliance (no Deforestation, no Peat, no Exploitation). This includes the prevention of forced, slave and child labor. For further details of Innospec's sustainable sourcing activities and copies of relevant certifications and Palm Policy see <https://innospecsustainability.com/environment/sustainable-sourcing>.

During 2021, in light of allegations of human rights abuses, Innospec suspended and then ceased purchases of raw materials from the Xinjiang Uyghur Autonomous Region of China.

## Training

**Innospec has a comprehensive and robust compliance training program, supported by an external training service provider, which administers online compliance training to all relevant employees throughout the year.**

Courses cover a wide range of compliance issues and are available in various languages to reflect the global nature of Innospec's business.

As a minimum, all Innospec employees are required to complete an online training course relating to the company's Code of Conduct (which emphasizes the importance of compliance with all applicable laws and regulations, including those relating to modern slavery and human trafficking, and provides guidance on how to apply the

requirements of the Code of Conduct in their daily work) and regularly certify their understanding of and compliance with the Code. The majority of employees also complete several additional online targeted training courses covering various specific compliance topics, some delivered online, and others delivered in person.

In 2021, we commenced the roll out of a specific modern slavery training module, initially to members of the supply chain function and new starters. The training module highlights modern slavery related risks, advises employees of relevant red flags and warning signs, and reinforces the requirement to promptly report all related concerns.

## Reporting Concerns

**Innospec requires all its employees and representatives to report concerns, including any that relate to actual or potential human rights abuses.** Employees are also expected to encourage suppliers, partners and other third parties to report anything they become aware of that could be unethical, unsafe or illegal. A speak up culture is encouraged, where employees and third parties are able to report concerns safely, without fear of reprisal or retaliation.

Innospec has many internal channels available for employees to seek compliance guidance or to report concerns, which are set out in the company's Reporting Corporate Governance Concerns Policy. Innospec maintains an externally-managed, anonymous reporting hotline which may be used to report, among other things, any concerns or suspicions

regarding slavery or human trafficking in Innospec's supply chain. Trained personnel investigate all reports in a timely manner, and confirmed violations are addressed with specific corrective actions. Innospec reserves the right to terminate contracts where appropriate.