

GROUP MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

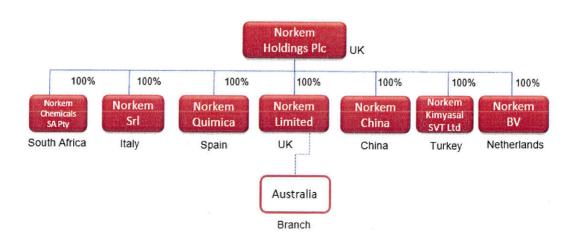
Norkem Holdings Plc, hereinafter referred to as Norkem, fully supports the aims of the Modern Slavery Act 2015 to eradicate human slavery and trafficking. In particular, Norkem strives to ensure that no child labour, servitude of any kind or human trafficking has been involved in the supply and distribution of our products or services.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps Norkem have already taken and continue to take to ensure that modern slavery or human trafficking is not taking place in our business or supply chains.

Our Business

Norkem Holdings Plc is a parent company consisting of the following subsidiaries:

- Norkem Limited, UK & Australia
- Norkem B.V., The Netherlands
- Norkem Quimica, Spain
- Norkem S.r.l., Italy
- Norkem Kimyasal Maddeler Sanayi ve Ticaret Ltds Sti, Turkey
- Norkem Chemicals SA Pty, South Africa
- Norkem Chemical Trading (Shanghai) Co Ltd, China





Supply Chain

As a supplier of globally sourced products and services to a broad spectrum of industries including food, pharmaceutical, cosmetics, feed, chemical and construction. Norkem is committed to working proactively with its supply chain, to ensure that the welfare of workers and labour conditions meets the elements of the ETI (Ethical Trading Initiative) "Base Code" and relevant ILO (International Labour Organisation) Conventions.

We have excellent long-standing relationships with suppliers. Norkem commits itself to practical and sustainable improvements to worker welfare and conditions, whilst taking into account diverse social groups, which exist within our supply chain. Norkem will actively endeavour to develop social standards with suppliers, to assist in delivering improved conditions for workers involved in our supply chain.

As part of our due diligence all new suppliers and sub-contractors are approved before use via questionnaires which now include questions based on the ETI base code. Suppliers and sub-contractors may be audited by Norkem's internal auditors who have been trained in order to recognise and identify potential signs of modern slavery.

Policies on Slavery and Human Trafficking

Modern slavery or human trafficking will not be tolerated in our business or supply chains. We may terminate the contract at any time should any instances of modern slavery or human trafficking come to light.

Norkem follow strict companywide policies including:

- Social responsibility
- Equality policy
- Whistle blowing policy, including bribery and cartels



Training and Awareness

Norkem has conducted companywide awareness training regarding modern slavery and human trafficking and our employees are encouraged to whistle blow as per our whistle blowing policy should any suspicions arise. All new Norkem employees are made aware of the above policies during their induction to the company. Any Norkem employee who audits suppliers or sub-contractors has been given additional training to recognise and identify potential signs of modern slavery and advice on how to proceed if it is suspected within our supply chain.

The Future

Norkem will continue to review our policies, procedures and training to ensure they reflect our commitment to prevent modern slavery and human trafficking within our business and supply chain. We will maintain open communication within our business and supply chain in order to share knowledge and may update our policies, procedures and training as and when new information is brought to our attention. Norkem will periodically review the effectiveness of the steps taken, which include annual reviews, third party audits and an on-going monitoring system of our suppliers and sub-contractors.

This statement was approved and authorised for issue by the Board of Directors of Norkem Holdings and has been signed on its behalf by:

Alan Nicholson

Chairman

Date: 2nd January 2019