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## Modern Slavery Act Statement – CP Kelco UK Ltd.

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This statement is made in relation to Section 54 of the *Modern Slavery Act 2015*. CP Kelco's understanding of slavery, servitude, forced or compulsory labor and human trafficking is based on the definitions that are set out in the Act.

### ORGANISATIONAL STRUCTURE

CP Kelco UK Limited is an affiliate of the J.M. Huber Corporation, a family-owned company since its founding by Joseph Maria Huber in 1883 with over 4,000 employees in 20 countries and \$2.3 billion in annual revenue.

CP Kelco is a nature-based ingredient solutions company with over 85 years of experience working with food, beverage and consumer products manufacturers worldwide. We unlock nature-powered success by applying ingredient innovation and problem-solving to develop customized solutions that leverage our regional insights, meet manufacturers' goals and address consumer preferences. Our key product lines are Gellan Gum, Pectin, Xanthan Gum, Carrageenan, Diutan Gum, Cellulose Gum/CMC, Refined Locust Bean Gum and Microparticulated Whey Protein Concentrate, as well as other unique biopolymers.

The following statement reflects the activities and efforts undertaken to further these efforts for the year ending 31 March 2019.

### OUR SUPPLY CHAINS

CP Kelco operates in diverse markets globally with equally diverse customer needs. Our supply chains include raw materials obtained from reputable companies worldwide. CP Kelco's established business practices ensure that all employees are confident in their ability to make decisions that allow the organization to conduct business ethically and minimize exposure to serious risk.

### OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

CP Kelco, as a strategic part of the J.M. Huber Corporation portfolio, adheres to The Huber Principles:

1. Environmental, Health & Safety (EH&S) Sustainability
2. Ethical Behavior
3. Respect for People
4. Excellence

These principles are our core values and they serve as our compass—guiding decisions, motivating our employees and ensuring that our Company will improve today for a better tomorrow. As we continue to transform and improve products used around the world, the Huber Principles define our culture and align with the core values of the Huber family, ensuring that everything we do is for the benefit of our people as well as our customers.

We also have policies relating to internal grievances, disciplinary issues and whistleblowing all of which allow employees to address concerns without fear of retaliation and which allow CP Kelco to take corrective action. We are proud that these principles have helped to stem the potential for slavery and human trafficking in our supply chain.

We are currently developing a code of conduct which unequivocally declares our statement on preventing modern slavery and human trafficking within the company and along its supply chain. Key elements are as follows:

- **Human rights:** The company supports and respects protection of internationally recognized human rights. The company will ensure that all employees are treated humanely, with dignity and that they will never suffer physical or mental punishment or any other form of abuse.
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- **Child labor:** The company does not use, support or benefit from child labor. Huber adheres to minimum age provisions of applicable laws and regulations and we adhere to UN Regulation C182 Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor.
- **Forced labor:** The company does not use, support or benefit from any form of forced labor. Huber prohibits physical abuse of employees and the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor or slave labor.
- **Human trafficking:** The company denounces any act involved in the recruitment, abduction, transport, harboring, transfer, sale or receipt of persons within national or across international borders, through force, coercion, fraud or deception. Huber expects all employees to be vigilant and report any acts of slavery and human trafficking discovered during their employment.

### DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

CP Kelco has systems to identify, assess and mitigate and monitor for the potential risk of slavery and human trafficking along its supply chains. As part of our initiative to identify and mitigate risk, CP Kelco:

- screens its suppliers, distributors, and other third parties for compliance with various laws and for reputational risk;
- ranks our relationships according to risk;
- requires that suppliers, distributors, and other third parties fill out questionnaires in which they disclose elements considered to pose a risk of slavery or human trafficking;
- requires compliance to applicable laws, and in some cases include the right to audit their operations in our contracts.

Such steps are particularly important in countries where our first-tier suppliers are located in regions where internationally accepted principles on human rights are not fully accepted.

### SUPPLIER ADHERENCE TO OUR VALUES

#### 1. *Supplier Code*

It is CP Kelco's policy to formally request that all suppliers respect the principles of our Supplier Code and that they adopt practices consistent with it.

The Supplier Code requires compliance with all applicable local laws and regulations as well as all internationally accepted standards anywhere operations are undertaken, reflecting our commitment to acting ethically and with integrity in all our business relationships, as well as to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere along our supply chains.

Key elements of the Supplier Code are as follows:

- **Respect for human rights:** no employee of a supplier shall suffer harassment, physical or mental punishment, or other forms of abuse.
- **No discrimination:** no employee of a supplier shall suffer discrimination because of gender, race, sex, sexual orientation, age, ethnic or national origin, religious or personal beliefs.

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- **Fair wages:** wages and working hours shall, as a minimum, comply with all applicable wage and hour laws, rules and regulations, including minimum wage, overtime and maximum hours in the country concerned.
- **No forced or compulsory labor:** no employee of a supplier will hold a position because of forced or compulsory labor, and employees shall be free to leave their employment with reasonable notice.
- **No underage workers:** suppliers must comply with International Labor Organization (ILO) standards when employing young workers, meaning that important provisions on how young people enter the work force and on their conditions of employment – such as minimum age of admission to employment, pay, working time, night work and medical examinations, occupational safety and health, and labor inspection – must be upheld.
- **Freedom of association and to collective bargaining:** supplier employees are entitled to freedom of association and to collective bargaining, where allowable by law.
- **A safe working environment:** safe and healthy working conditions must be provided to all employees of a supplier.

We have a dedicated compliance team which involves our Legal, Compliance, Human Resources and Procurement departments.

*2. Supply Chain Sustainability Team*

CP Kelco has a supply chain sustainability team that meets on a regular basis to review internal audit targets or those arising from SEDEX audits.

**TRAINING**

CP Kelco provides staff training to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business.

This statement is made pursuant to Section 54 of the *Modern Slavery Act 2015* and constitutes slavery and human trafficking statement for CP Kelco UK Limited for the financial year ending 2018.



Jérôme Béra

Director, CP Kelco UK Limited

Date: 8 April 2019



Victor Dean

Director, CP Kelco UK Limited

16 April 2019