

## **Modern Slavery Statement – Belzona International Ltd (“Belzona”)**

Published: July 2023

### 1. Introduction

Belzona International Ltd is a UK company, and this statement has been published in order to meet the requirements of Section 54 of the Modern Slavery Act 2015. It sets out Belzona’s controls and risk management processes in relation to Modern Slavery, and our commitment to combating slavery and human trafficking in all parts of the Belzona business.

We understand the significance of this issue and our responsibilities as an ethical supplier of industrial solutions. Belzona’s senior leadership is committed to preventing Modern Slavery in our organisation, and will provide the necessary resources, support, and oversight to ensure the effectiveness of our anti-slavery initiatives.

The Belzona International Ltd board has approved this statement.

### 2. Our Business

Belzona is a designer and manufacturer of composite repair materials and industrial protective coatings. These polymeric materials are used to repair, protect and improve industrial assets operating in aggressive environments. This repair philosophy extends the life of the asset and avoids the need for replacement, thereby reducing environmental impact, cost and downtime for the customer.

Belzona operates as a global company and has corporate centres in the UK, US, Canada, Thailand and China. Products and solutions are supplied to customers around the world through a network of authorised Distributors.

### 3. Our Policies

Belzona’s policies strictly prohibit human trafficking and the use of involuntary labour in our business and supply chain. They encompass human rights, fair labour practices, and ethical conduct, and they are communicated throughout the organisation.

Belzona will comply with all applicable Modern Slavery laws and regulations, in the UK and in any other jurisdictions in which Belzona operates. We will conduct ourselves and treat others with honesty, respect and dignity. “Integrity” is one of the three core values of the Belzona business (Integrity, Investment, Innovation).

Belzona is committed to operating in a morally responsible way in all areas of business, which includes providing staff with a safe, supportive and healthy working environment, and following environmentally sustainable business practices.

Belzona is committed to paying a fair wage and providing appropriate recompense for the efforts of workers. Belzona is a “Real Living Wage” employer: <https://www.livingwage.org.uk/>

Belzona is committed to providing awareness training on Modern Slavery to all relevant staff, such as the Purchasing team (upstream supply chain) and Distributor Support team (downstream supply chain), ensuring that our workforce understands the indicators of Modern Slavery, their legal obligations, and the reporting mechanisms in place.

Belzona fosters a culture of vigilance, empowering our employees to recognise and report any potential instances of Modern Slavery. Belzona’s Whistleblowing Policy sets out the company’s commitment to supporting workers (or business partners) who make disclosures about wrongdoing or malpractice, and this includes, but is not limited to, Modern Slavery. The policy provides reassurance that such whistleblowing can occur without fear of retaliation for any allegation made in good faith, and we are committed to treating all reports seriously.

#### 4. Our Supply Chain

We employ due diligence processes to assess the compliance of our business partners, and we expect our partners to share our commitment to combating Modern Slavery. We are committed to meeting and, where possible, exceeding accepted due diligence standards.

Belzona's Purchasing team works closely with our raw material suppliers to build strong relationships and develop a good understanding of their business practices. Any vendor shown to act unethically and breach Modern Slavery commitments would be challenged and, if necessary, removed as a supplier.

Belzona's focus is on the purchase of high-quality, high-performance raw materials for use in the manufacture of Belzona products, and as such Belzona only partners with reputable suppliers. Material reliability and quality always take priority over cost.

Belzona carries out screening of key suppliers, large and small, with a view to obtaining written statements of their commitment to combating Modern Slavery and complying with Modern Slavery legislation. Belzona's suppliers recognise that a lack of commitment to preventing Modern Slavery means that their Belzona business could be at risk.

Belzona's primary marketing route is via a network of authorised Distributors who market, stock, resell and provide technical support on Belzona products in-country. All new Distributors are vetted before appointment and are asked to provide a written commitment (via contractual obligation or a compliance statement) that they will act ethically and uphold Belzona's zero-tolerance stance on Modern Slavery. We will thereafter continue to assess their compliance throughout the business relationship, via regular dialogue, assessment, and engagement with Distributors to help them improve their systems.

Belzona's expectation of Distributors is that they will provide their employees with a safe, secure, and healthy working environment; they will not tolerate child labour, forced labour, slavery, human trafficking, or any other exploitative treatment of workers in any part of their business; and they will immediately report any breaches relating to slavery or human trafficking to Belzona.

#### 5. Certification

To do business with Belzona, suppliers and Distributors must agree to comply with all applicable laws and regulations, and adhere to our policies. Our policies go beyond compliance with existing law.

We continually work to update and strengthen our policies, reviewing lessons learned from our supply chain, emerging best practices, and internationally recognised rights frameworks. Accordingly, our suppliers and Distributors must continue to make equal progress in maintaining their compliance with our evolving standards.

We are committed to respecting internationally recognised labour and human rights in our business and supply chain, and we continue to work with others across industry towards eradicating human trafficking and Modern Slavery worldwide.

This Modern Slavery statement will be reviewed annually to ensure its ongoing relevance, effectiveness, and compliance with legislation. Updates will be made as necessary to reflect changes in the law, our operations, and evolving best practices.

Signed:



Name: B Nisill

Position: CEO

Date: July 2023