



Supplier Code of Conduct

Policy statement

Oxkem is a manufacturer of metal salts. The company is one of the world's largest manufacturers of trivalent chromium and vanadium compounds and is also a producer of other inorganic metal salts.

We work on a global basis with a diversity of industries and partners, always aiming to conduct our business in a collaborative, supportive and ethical way.

- Oxkem is committed to working with its suppliers to ensure a high level of environmental, ethical, and social responsibility in its supply chain. Our Supplier Code of Conduct sets out a range of social and environmental issues to which we expect our suppliers to adhere.
- Oxkem's suppliers should ensure that they are in full compliance with all applicable national laws and recognised international standards. If there is any discrepancy between national law or the terms set out in this Supplier Code of Conduct, suppliers must adhere to the higher standard.
- All suppliers are responsible for ensuring compliance through their own supply chain.
 - All our suppliers agree that they will work with Oxkem to ensure compliance.
 - In relation to this Code of Conduct, all suppliers agree to return any self-assessments to Oxkem and agree to any audits that Oxkem might wish to undertake.
 - Should any supplier fail to adhere to Oxkem's Supplier Code of Conduct, Oxkem reserves the right to terminate any contract immediately.

Modern slavery and human trafficking

Oxkem has zero tolerance of slavery and human trafficking and is committed to working with all its partners and employees to ensure that modern slavery is not present in the supply chain and elsewhere.

- Oxkem does not knowingly work with companies or individuals that/who do not follow the UK Modern Slavery Act 2015, or which/who do not adhere to the same standards as Oxkem.
- All Oxkem employees are required to inform senior management of any concerns they might have about modern slavery in the supply chain; the matter will be dealt with in the strictest confidence. We expect our suppliers to apply the same requirements for their employees.
- All persons employed by Oxkem's suppliers should be issued with a written contract that clearly sets out conditions of employment.
 - No employee should be tied to the employing company by any unreasonable restrictions.
 - Suppliers should ensure that they, and their suppliers, do not engage in any forced, compulsory, bonded, or trafficked slave labour.
- Oxkem's Modern Slavery Policy forms part of its standard terms and conditions for suppliers. Suppliers are required to confirm that they have read and understood our policies and that they will comply with these standards.
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Child labour

Oxkem has a zero tolerance of child labour in any form. It expects its suppliers to comply with all local laws relating to the prevention of child labour, and as specified by the International Labour Organization



(ILO) Convention No. 182. Suppliers must ensure that young people are at least 15 years old for general employment, beyond the age of compulsory education, and over 18 years old if they are employed in any hazardous or night-time work.

Wages; benefits; working hours; non-discrimination.

All employees at Oxkem are employed on clear written contracts and are paid wages that are in accordance with the laws of England and Wales. We expect all our suppliers to pay wages and benefits that follow all applicable local laws and industry standards.

- Where there is no local minimum wage, wages should be paid at a level which, at a minimum, meets the local standard. Suppliers must pay all wages, accrued overtime payments, and any expenses owed to the employee in a timely manner and in full.
- Suppliers must ensure that their employees work a regular week in accordance with ILO Convention No. 1, Hours of Work. As part of our suppliers' contractual obligations to their employees, all suppliers must give employees breaks, annual paid leave, and at least one day off every week.
- Suppliers must not, directly, or indirectly, discriminate against their employees in matters of compensation, hiring, promotion, training, or any other activity on the basis of age, disability, gender, political opinion, sexual orientation, religion or race, or through any other form of discrimination not covered in this Supplier Code of Conduct. All suppliers will ensure that their employees work in an inclusive organisation which deals promptly and decisively to counter all forms of harassment, physical coercion, and mental and physical abuse.
- All suppliers must institute a formal grievance policy which should be communicated clearly to all employees at the commencement of their employment and throughout their period of employment.

Privacy

All Oxkem's suppliers should comply with all local privacy laws and ensure protection of the personal data of all employees and contractors, and of any third party working with the supplier.

Health and Safety

- Suppliers must adhere to all local law and to industry-standard practices in health and safety.
- Suppliers must provide all employees with a safe working environment and must integrate best-practice health and safety management into their business.
- All employees should have the right to refuse to work in any unsafe or unhealthy working environment.
- All employees must have received health and safety training relevant for each job that they might undertake.
- Each employee should be fully trained for the role that they are employed to do. This training should include, but is not limited to:
 - dealing with hazardous situations and emergencies.
 - the need for appropriate personal protective equipment.
 - safe working procedures.
 - implementation of accident/near-miss reporting.



- All personal protective equipment should be appropriate for the job in question and should be provided by the supplier.
- Suppliers shall ensure that all concerns raised by employees are noted, and, if necessary, acted upon promptly.

Environmental

All suppliers should comply with local environmental laws and requirements and industry standards, surpassing them where possible.

- Each supplier should implement an environmental policy and management system to the level of ISO 14000 or equivalent and should also have set out a plan for continuous environmental improvement, as required by ISO 14000 or equivalent.
- Suppliers should have formulated a policy to reduce their environmental footprint. This should include working towards reductions in packaging materials, energy usage and water consumption, and the minimisation of waste in any manufacturing process.
- All emissions to air and water should be monitored, with continuous improvements being made to reduce these emissions. All suppliers should be measuring their carbon emissions, with a plan in place to drive down emissions.
- Procedures should be implemented to enforce recycling and reuse, and employees should be made actively aware of the need for energy conservation.

Ethics

Oxkem is committed to carrying out its business honestly and openly and will not act in any way that will compromise the integrity of its business and practice.

- We expect all our employees to behave with honesty, discretion, integrity and respect towards all colleagues, visitors, contractors, suppliers, and to anyone else who might visit or interact with Oxkem.
- We expect our suppliers to conduct their business in an ethical manner and to work fully within international and local laws.
- As stated in its supplier terms and conditions, Oxkem has zero tolerance for any form of bribery, corruption, extortion, money laundering or embezzlement. Suppliers are responsible for ensuring that their employees, sub-contractors, and any representatives are a) aware of this, and b) abide by the standards expected of them internally and by law.
- Each supplier should be able to implement a whistle-blowing procedure whereby employees can report concerns without any fear of reprisal. All employees should be aware of this procedure.

Trade in conflict minerals

Responsible sourcing of minerals is an important part of Oxkem's sustainability policy.

- Oxkem's suppliers, having implemented policies and measures to ensure that minerals in their supply chain have been responsibly and legally sourced, should conduct due diligence to ensure that this is indeed the case.



- Upon request, suppliers should be ready to supply OXkem with a copy of their policy for responsible sourcing of minerals.

Reporting breach

- Any breach of this Code of Conduct, of OXkem's policies, or of local/international law should be reported immediately to OXkem.
- The supplier should promptly investigate any breach and take appropriate action to ensure that such a breach does not occur again.
- The supplier agrees to inform OXkem of any changes that might have a bearing on compliance. This applies to both:
 - a) changes undertaken by the supplier after any breach in order to ensure future compliance; and
 - b) changes undertaken voluntarily by the supplier which might have a bearing on future compliance.

Edward Head

A handwritten signature in blue ink, appearing to read "Edward Head", is positioned above the typed name.

Managing Director
OXkem Ltd
1st January 2023