

## **Statement pursuant to the Modern Slavery Act 2015**

This Modern Slavery and Human Trafficking Statement is made by Zirax Limited and its subsidiaries, (“Zirax”), pursuant to section 54 of the Modern Slavery Act 2015.

### **1 Group structure and business**

Zirax Limited is a private limited company registered in England and Wales with registered number 05533825. Zirax is an international specialty chemical production group with its primary markets in Europe, Russia, the United States and the Middle East.

Zirax (UK) Limited, Zirax’s subsidiary in England is responsible for the marketing and sale of Zirax’s products in the UK, Italy, Finland, the U.S. and other countries. Zirax LLC, Zirax’s Russian subsidiary is the group’s manufacturing and product development company.

### **2 The Modern Slavery Act 2015 (the ‘Act’)**

The Zirax group prides itself as one whose operations are conducted to the highest standards with personnel having a depth of both technical and commercial expertise. As part of its corporate governance standards, Zirax seeks to ensure that its wider business practices also meet the highest standards and are seen to do so. The directors of Zirax are committed to ensuring that the Zirax group acts ethically and with integrity in all its business relationships.

In particular, Zirax is aware that the risk of labour abuse through any form of slavery, servitude, forced or bonded labour (of adults or minors), or human trafficking (collectively referred to as ‘modern slavery’ in this Statement) is a very significant one for industries that operate on a global basis and it is therefore a key concern for Zirax. Although, Zirax believes that its group operates in a relatively low risk industry sector in regard to modern slavery, it is committed to taking the necessary steps to reduce the risk of modern slavery taking place at any level in its supply chain.

The Act obliges business to state the steps taken during the financial year to ensure that modern slavery is not taking place in their operations. Zirax’s supply chain includes various companies with production in Russia and the U.S. In addition, Zirax engages professional services as well as utilities, IT equipment, office-supply companies and professional advisers. These types of services are supplied to Zirax group companies in various locations and, therefore, there are some suppliers who are based outside of Europe and the U.S.].

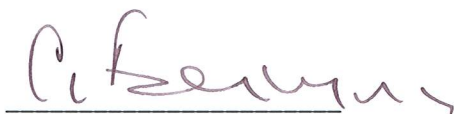
Zirax has made and are continuing to make clear to its suppliers that it does not and will not tolerate modern slavery in any of its various forms. Zirax endeavours to use only those suppliers who both agree within the applicable service supply terms to adhere to this same principle and who commit to ensure a safe and healthy working environment for their employees. Where Zirax has concern in relation to the underlying supply chain, it requires its first-tier suppliers to take similarly active steps to identify whether any form of modern slavery may exist at the second or third tier levels and to audit for this at regular and reasonably frequent intervals.

### **3 Due diligence processes, training and reporting**

In support of our policy, Zirax has established an action plan which includes:

- undertaking a review to identify potential risk areas in its supply chains taking into account factors such as the nature of the operations, situations and/or supplies that represent a particular risk, whether due to the location, industry sector or other characteristics of the business;

- consulting with its global business partners to ensure consistency of modern slavery policy and its practical implementation across our service supply;
- devising and putting in place appropriate training for our staff and especially those engaged in procurement activities and recruitment;
- developing and putting in place appropriate guidance, support and confidential facilities for the purpose of reporting concerns regarding the policy and its implementation, which is outside normal reporting lines and ensures that the information is received by those member(s) of senior management having oversight of modern slavery-related matters; and
- regularly assessing how effectively its policy is being implemented and what further steps may be necessary.



Sergey Belichenko

Director

25 February 2020

Approved by the Board on 25 February 2020