

# Calgon Carbon Corporation / Chemviron: Slavery and Human Trafficking 2022 Statement

This statement is made in accordance with the requirements of s. 54 of the (UK) Modern Slavery Act 2015. It sets out the steps that Calgon Carbon Corporation, together with its Chemviron European organization, has undertaken during the 2022 financial year, ending on 31 December, and the measures it is currently applying to ensure that slavery and human trafficking is not taking place across the group's entities (including its UK subsidiary Chemviron Carbon Ltd. and its Belgian direct holding company, Chemviron S.A.), or in our supply chains. This statement will be updated annually.

## WHO WE ARE

# **Organizational Structure and Activities**

Calgon Carbon Corporation, together with its Chemviron European organization, is a global manufacturer, supplier, and developer of activated carbons, innovative treatment systems, value added technologies and services for optimising production processes and safely purifying the environment. We have an industry leading R&D facility, where some of the industry's leading visionaries strive to create new technologies, expand service capabilities and create process improvements. From drinking water and wastewater treatment, to odour control, chemical and pharmaceutical manufacturing or processing, we have the experience and capabilities that provide value to our clients every day, across the world.

We produce a range of pulverised, extruded and granular carbons, including acid washed and impregnated products for use in a wide range of air, gas, water and process applications. We also market granular and powdered wood-based activated carbon, diatomaceous earth and perlite filtration media which are used in various applications including food and beverage, industrial, fine chemicals and pharmaceuticals.

With approximately 560 employees in Europe and headquartered in Belgium, Chemviron has a network of sales offices in Germany, France, Italy, Denmark, Sweden and the United Kingdom as well as an extensive network of agents and distributors worldwide. Calgon Carbon Corporation and Chemviron are part of the Kuraray group of companies, ultimately held by Kuraray Co., Ltd., a company publicly traded on the Tokyo stock-exchange with over 9,000 employees worldwide.

In the United-Kingdom, our reactivation centre is located in Tipton (West Midlands) and we have a specialty activated carbon manufacturing plant located in Ashton-in-Makerfield, near Manchester. Chemviron Cloth Division (CCCD), located near Newcastle, produces Activated Carbon Cloth, under the FLEXZORB® and ZORFLEX® brands, for a range of special applications.

# **Our Supply Chain**

We maintain many relationships with different organisations in our supply chain, ranging from our material suppliers, human resources partners (recruitment and interim staffing agencies), to our various service providers and partners, including constructors engaged to modernize our various facilities, and our network of agents and distributors to sell our products.

# **OUR POLICY ON MODERN SLAVERY AND HUMAN TRAFFICKING**

- We have a "Combating Trafficking in Persons" policy in place, which provides for our internal norms regarding this matter.
- In addition, we adhere to Kuraray Corporate Statement, we have a strict Code of Conduct in place as well as a Compliance Handbook and various internal policies that apply throughout the entire organisation, promoting ethical behaviour and setting the core values governing our conduct in our daily activities, including our relationships with our partners in our supply chain. We deliver regular trainings on the Code of Conduct throughout all of our locations.
- We are committed to complying with all the laws applicable to our business, including labour, health and safety laws towards our employees as well as interim staff, external consultants and anyone entering our premises.
- Our attitude towards modern slavery and human trafficking is zero tolerance and we require all those in our supply chain to comply with applicable laws and share our values.



- We will not forge commercial relationships with any business which we know is involved with slavery or human trafficking.
- If a supplier or any other partner is suspected of involvement in slavery or human trafficking, they will be investigated and, if the suspicions are substantiated, Calgon Carbon Corporation or, as the case may be, Chemviron, will take appropriate measures, including termination of business relationships. We also reserve the right to report misconducts to the relevant authorities, where appropriate.

#### STATEMENT - WHAT WE ALWAYS DO AND DID IN 2022

# Our Employees

- We comply with all applicable laws in the jurisdictions where we do business, including, among others, employment, health, safety and human rights laws.
- We do not employ children or anyone below the minimum age of employment.
- We always enter into formal and lawful employment relationships with all of our employees and we ensure that they all have the right to work in the jurisdictions where we employ them.
- We declare all of our employees to the tax and employment authorities of all the jurisdictions where we employ them.
- We permit our employees to be unionized.
- We have work councils in our European organizations where both employees and ourselves are represented.
- We provide all the necessary work and safety tools, equipment, gears, facilities, training, etc. to our employees for them to perform their work comfortably and in the safest way.
- We do not hold any of our employees passports, work or residency permits or certificates or authorization, and do not hold them in their employment against their will. Our employees are free to leave their employment only subject to the compliance of their contractual and legal obligations.
- We review our existing records for employees as well as temporary our interim staff and ensured to have complete records, with all documents evidencing our employees' right and freedom to work with us.
- We provide trainings to our employees on our Code of Conduct, Corporate Statement and Compliance Handbook in our UK locations, for our UK and Nordics employees.

## Our Recruitment and Interim Staffing Agencies

- We do not permit our agencies to employ children or anyone below the minimum age of employment and we ensure that the interim or future staff they refer to us all have the right to work in the jurisdictions where they will be employed for our activities.
- We declare all of our employees to the tax and employment authorities of all relevant jurisdictions.
- When we have doubts about a particular (future) employee, we consistently investigate and ask for more evidence from our agencies, when need be, prior to hiring him or her.
- We provide all the necessary work and safety tools, equipment, gears, and facilities to our interim staff for them to perform their work in the safest and most comfortable way.
- We disclose truthful and accessible information of our advertised employment opportunities and prohibit the use of fraudulent practices during the recruitment of our employees.
- We only work with professional recruitment companies that comply with the applicable employment laws.
- We do not charge candidates and recruits any recruitment fees, of any kind.
- We focus on our recruitment and interim agencies and review our contracts with them and where we feel necessary, we have asked them for either a specific commitment on the above topics or for the inclusion, in our contracts with them, of clauses to this effect. We finalized a template of "anti-modern slavery" contractual commitment that we will send without delay in 2023 to all recruitment and interim agencies we deal with across Europe.

# Other Supply Chain Partners

- We require all of our partners to comply with all applicable laws, including, among others, all applicable employment, health, safety and human rights laws.
- We audit our suppliers' compliance with applicable laws on labour, employment, health, safety and human rights and on their anti-slavery and human trafficking policies and procedures in place.
  - We include, in our quality questionnaire sent to all of our worldwide activated carbon suppliers as part of our supplier qualification process, ethics questions and confirmation statements about modern slavery, forced labour and human trafficking. For all other suppliers, we added a similar statement to our new supplier's registration process. The questionnaire included a section entitled "Respect for Human Rights". Based on the results of the questionnaire, respect for human rights is not an area of risk for our suppliers. The questionnaire is sent every two years to our key suppliers.



## STATEMENT - WHAT WE WILL DO

# Compliance & Risk Assessment & Due Diligence

Internal Processes and Direct and Interim Employment

 We will continue to review and further strengthen our compliance and risk management processes in relation to employment law, human rights, modern slavery, forced labour and the protection of vulnerable and exploited workers.

# Recruitment and Interim Staffing Agencies

• Throughout 2023, we will send our template of "anti-modern slavery" contractual commitment to all of our recruitment and interim agencies and ask them to return it signed.

# Other Supply Chain Partners

- Our UK business supply chain is worldwide based and we would expect our partners to, at best, already have antislavery and human trafficking policies and procedures in place, and at the very least, to comply with all applicable laws on employment, health, safety and human rights which we are confident are strict enough on the prohibition and prevention of human slavery and trafficking.
- During our supplier qualification process, we will continue to send, to all of our worldwide activated carbon suppliers, a quality questionnaire, in which we include ethics questions and confirmation statements about modern slavery, forced labour and human trafficking. For all other suppliers, we will add a similar statement to our new supplier's registration process.
- Extensive work has been deployed within the group in 2022 in order to review the current supplier's pre-qualification questionnaire so as to widen its scope to include more ethical topics, including modern slavery and human trafficking as well as to cover 80% of all the group's suppliers. As the objective is to have a single questionnaire for the entire Kuraray group, the review and validation process is more extensive and was completed in 2022. The questionnaire consists of more than 50 questions on various topics, including human rights, contribution to society, fair business, safety & quality etc. In 2023, we will send our questionnaire to 91 suppliers across our division (Kuraray's Environmental Solutions Division), with the goal to cover 80% of global Kuraray spend.
- We will continue to conduct on-site checks and audits to any of our active carbon suppliers. We expect to keep increasing the number of audits in the course of 2023.

# Agents and Distributors

• We will continue to send our Supplier Code of Conduct to all our new agents and distributors declaring not to have one.

## Management, Communication and Monitoring Processes

Internal Processes and Direct and Interim Employment

- We will ensure that all of our future agreements with agencies as well as relevant partners include a clause on compliance to employment law as well as respect of human rights and negative covenants on modern slavery, forced labour and human trafficking.
- We will communicate our policy internally to all of our employees (permanent, temporary, interim).
- We have reviewed and introduced a revised, and now global, whistleblowing policy, which aims to encourage the reporting, by our employees, of concerns and the protection of whistle blowers relating to our policy.
- We are committed to complying with public requests for access to facilities for the prevention of human trafficking and slavery, as required by law.

## Other Supply Chain Partners

• We will continue to require our commercial partners to act consistently with our anti-slavery values.

Approved by the board of directors of Chemviron Carbon Limited on June 9, 2023 and by the board of directors of Chemviron S.A. on June 9, 2023.



Reinier Keijzer, Managing Director ("administrateur-délégué") June 9, 2023