



Modern Slavery Transparency Statement

Modern slavery is a crime and a gross violation of fundamental human rights. Vynova Group has a zero-tolerance approach to modern slavery and we are fully committed to preventing slavery and human trafficking in our corporate activities. We are also committed to ensuring there is transparency in our own businesses and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the UK Modern Slavery Act 2015 and equivalent laws in other countries.

This statement has the full support of the Vynova Management Board and was approved on 23rd January 2024.

Our business.

Vynova Group is a leading European manufacturer of chlor-alkali products and PVC resins. With a network of production sites in five countries and more than 1,275 employees, we generate annual sales of around 1 billion euros.

Vynova Group consists of:

- Vynova Belgium NV, Belgium
- Vynova Wilhelmshaven GmbH, Germany
- Vynova Beek BV, Netherlands
- Vynova Mazingarbe SAS, France
- Vynova Runcorn Ltd, United Kingdom

Our supply chains.

Vynova Group's activities are carried out in the European Union and the United Kingdom which we consider to be low risk in relation to Modern Slavery. Nevertheless Vynova Group recognises its responsibility and has alerted relevant staff to the risks of slavery, however small, in their businesses and across the wider supply chain. Those staff are expected and encouraged to report concerns to management, who will then act upon them.

The relationship with the majority of our suppliers has been established over a number of years. Conducting our business to high ethical standards is a continuous element of our Third Party Management and an ever-green topic during business cooperation with our suppliers. All new contractors or suppliers have to be pre-qualified and we have now included Modern Slavery Act compliance into that on-boarding process .

In our own business we do not use any form of child labour and forced labour, we prohibit compulsory overtime and do not confiscate original identification documents from our own or external employees. We also expect our suppliers and contractors to adhere to these principles.



Our policies on modern slavery and human trafficking.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Vynova Code of Conduct, our Supplier Code of Conduct, as well as our Sustainable Procurement Guidelines reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Other policies in our businesses that we consider giving us strength in avoiding modern slavery or human trafficking under the Act, are:

- Vynova Social Accountability Statement
- Vynova Group HR Guidelines

Risk assessment and due diligence processes for modern slavery and human trafficking.

As part of our initiative to identify and mitigate risk, we have put in place systems to:

- monitor potential risk areas in our supply chains
- conduct selective supplier audits
- include due diligence regarding anti-slavery in M&A activity
- provide a whistle blower system for workers in our operations or supply chains to raise concerns or make complaints
- protect whistle blowers
- raise the awareness of our employees for modern slavery
- provide training to existing and new employees involved in Third Party Management

We have further intensified the focus on ethical aspects, including but not limited to anti-slavery, of the cooperation with suppliers, not only as part of the due diligence process for onboarding new suppliers, but also in the evaluation process of our existing, long-term suppliers.

Training.

To maintain awareness and ensure a high level of understanding of the risks of modern slavery and human trafficking across our businesses we provide training to relevant members of staff, primarily to our general management, and our HR and procurement staff.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes Vynova Group's modern slavery and human trafficking statement for the financial year ending 2023.

Signed on behalf of Vynova Group

23rd January 2024

A handwritten signature in blue ink, appearing to read "Henk Veldink". The signature is stylized and includes a horizontal line at the end.

Henk Veldink - Chief Operating Officer