



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 7th February 2022.

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 1,200 employees, we generate annual sales of nearly 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 .

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 Anti-slavery Policy reflects 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.



Among the other policies that we consider give us strength in avoiding modern slavery or human trafficking under the Act in our businesses are:

- Vynova Social Accountability Statement
- Vynova Code of Conduct
- Supplier Code of Conduct

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
- protect whistle blowers
- raise the awareness of our employees for modern slavery
- provide training to existing and new employees involved in Third Party Management

The COVID-19 pandemic has had an impact on the standard auditing processes, since physical audits at our suppliers premises were not appropriate and often not possible. Nevertheless, 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 on-boarding new suppliers, but also with 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 train relevant members of 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 2021.

Signed on behalf of Vynova Group

07.02.2022

A handwritten signature in blue ink, appearing to read "Luc Leunis". The signature is fluid and cursive, written over a light blue horizontal line.

Luc Leunis

Executive Vice President Monomers Operations