

# COMPLIANCE STATEMENT REGARDS MODERN SLAVERY 2022

## Introduction

The UK Modern Slavery Act 2015 requires commercial organisations with an annual turnover of £36 million or more to set out the steps they have taken to deal with modern slavery risks in their business or supply chains. The term “modern slavery” covers a wide range of abuse and exploitation including slavery, servitude and forced or compulsory labour (including child labour), and human trafficking. As a group, OCI is committed to respecting human rights and employees' rights in its own organisation and in its supply chain.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that OCI N.V. (“OCI Global”) has taken to prevent modern slavery and human trafficking occurring within its business and supply chains.

OCI Global also reports on behalf of OCI Fuels B.V. and OCI Methanol Marketing B.V.

This statement is for the financial year ending 31 December 2022.

## OCI Global’s structure, its business, and its supply chains

OCI Global is a global producer and distributor of hydrogen products providing fertilizers, fuels, and feedstock to agricultural, transportation, and industrial customers around the world. OCI's global production capacity spans four continents and comprises 16.7 million metric tons per year of hydrogen products, including ammonia, nitrogen fertilizers, methanol, biofuels, diesel exhaust fluid, and other nitrogen products. OCI Global has 4,059 employees, is headquartered in the Netherlands, and listed on Euronext in Amsterdam.

More information regarding OCI Global, geographical presence of OCI Global and the commercial footprint and supply chain can be found on [OCI Global - Powering a cleaner future sooner \(oci-global.com\)](https://oci-global.com).

## OCI Global’s policies and values

As part of our CARE values (which stands for Collaboration, Agility, Resourcefulness and Excellence), our standard of Excellence emphasizes the requirement to act with integrity, by all of our employees during all of our business activities.

This is also reflected in our Compliance Framework, consisting of the Code of Conduct and underlying Policies. Whereas our Code of Conduct sets out the principles every employee should observe to do business with integrity, its underlying policies contain further guidance on specific topics.

Relevant documents:

- (i) The **Code of Conduct** requires all employees to act responsibly, transparently and with integrity and respect towards all stakeholders;

- (ii) Furthermore, OCI Global has a **Human Rights Policy** which expressly prohibits modern slavery, and there is an expectation that employees maintain a strong awareness of relevant human rights risks in our own operations and those of our business partners. Our Human Rights Policy aims to ensure the salient human rights issues potentially arising through our supply chain are tackled effectively and contain the following human rights principles: no forced and child labour, non-discrimination and harassment, equal employment and development, safe and healthy workplace, fair compensation and living wage and freedom of association and collective bargaining;
- (iii) We are committed to ensuring that there is transparency in our business. Accordingly, we maintain a **Business Partner Code of Conduct** which outlines our expectations towards all our business partners, including suppliers with regards to the same compliance topics as are included in our Code of Conduct, and aligns to international laws and standards on ethics, labor, and human rights such as those set out by the International Labor Organization (ILO), the United Nations International Children's Emergency Fund (UNICEF) and the United Nations Guiding Principles on Business and Human Rights (UNGPs), among others. OCI Global expects its business partners to uphold similar standards and to expect the same from their own business partners. Failure to comply with the principles of the Business Partner Code of Conduct may result in discontinuance of business relationships; and
- (iv) The **Whistleblower Policy**, which encourages staff to report any concerns of malpractice or wrongdoing which includes, among others, human rights violations such as modern slavery. OCI Global has various reporting channels to raise concerns, including an (anonymous) Whistleblower Hotline, EthicsPoint. The Whistleblower Policy has recently been updated to include requirements from the EU Whistleblower Directive.

More information regarding our policies, can be found on our [Corporate Governance](#) page under *Policies & procedures*.

### **OCI Global's due diligence processes in its business and supply chains**

A key aspect of our Third Party Management is our Integrity Due Diligence Program. As part of this program, we screen our prospective business partners to identify potential issues regarding, among others, human rights, labor conditions and modern slavery. Where required, we perform additional in-depth due diligence and take action to remediate risks or do not engage with a certain business partner. When a third party is included in our Integrity Due Diligence tool, it is subject to ongoing monitoring which means that we receive alerts on any new potential compliance issues.

OCI Global expects its business partners to uphold similar standards with respect to the screening of prospective business partners, and to expect the same from their own business partners.

### **OCI Global's training**

All employees are trained on the key principles and applications of the Compliance Framework through E-learnings, webinars and in-person risk-based training to relevant audiences on specific topics, and on how to raise any concerns and/or breaches of the Code of Conduct through a safe and confidential whistleblowing and incident reporting procedure, without being retaliated against.

## **Effectiveness in ensuring that modern slavery and human trafficking is not taking place in its business or supply chains**

OCI Global has a dedicated Compliance team to address, among others, the implementation of the Human Rights Policy as part of our internal control framework, with the aim to assess the effectiveness of the measures we take and to regularly review and refine our policies and procedures in relation to modern slavery and human rights.

### **Corporate statement**

The Board of OCI N.V. approves this statement which will be reviewed and updated annually.

5 June 2023