

# COMPLIANCE STATEMENT REGARDS MODERN SLAVERY

## 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. has taken to prevent modern slavery and human trafficking occurring within its business and supply chains. OCI N.V. 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 2021.

## OCI's structure, its business, and its supply chains

OCI N.V. is a leading global producer and distributor of nitrogen products providing sustainable solutions to agricultural and industrial customers around the world. Our production capacity spans four continents and comprises approximately 16.1 million metric tons per year of nitrogen fertilizers, methanol, diesel exhaust fluid, melamine, and other nitrogen products. We employ approximately 3,600 people in Europe, the United States and the Middle East and are listed on Euronext in Amsterdam. More information regarding OCI, geographical presence of OCI and the commercial footprint and supply chain can be found on <https://www.oci.nl/>.

## OCI policies and values

OCI strives to conduct all business activities responsibly, transparently, and with integrity and respect towards all stakeholders. These values underpin everything we do and form the framework which defines the day-to-day attitudes and behaviours of our employees. To make those values clear and to provide clear ground rules for how we do business, our Compliance Framework consists of various compliance policies, including (i) a **Code of Conduct**, which outlines our commitment to honesty, integrity, mutual respect, and diversity; (ii) an **Anti-bribery and Anti-corruption Policy**, which gives guidance on the norms of business integrity; and (iii) a **Whistleblower Policy**, which encourages staff to report any wrongdoing which includes human rights violations such as modern slavery. OCI has extensive reporting channels to raise concerns, including an (anonymous) Whistleblower Hotline and intranet communication tool. Furthermore, OCI has (iv) 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.

We are committed to ensuring that there is transparency in our business. Accordingly, OCI has developed (v) a **Business Partner Code of Conduct** which summarizes the values and expectations we require all business partners, including our suppliers, to adhere to, 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 asks 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 Partners Code of Conduct may result in discontinuance of business relationships.

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

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

Based on OCI's Code of Conduct, screening of all business partners is performed when considering new relationships, as well as on an ongoing basis to verify compliance with and implementation of our Business Partners Code of Conduct. We conduct customary due diligence on our business partners including screening against sanction lists and compliance databases, and on environmental performance, labour practices and human rights performance. We also check for any adverse media coverage in relation to new business partners, including if the potential business partner has been involved in any illegal or unethical conduct.

In addition, all existing business partners are continuously monitored. It is the business partner's responsibility to maintain compliance with our Business Partners Code of Conduct and to promote this within its supply chain.

### **OCI training**

All employees are trained on the key principles and applications of the Compliance Framework through various forms of training and awareness and can raise any concerns and/or breaches through a safe and confidential whistleblowing and incident reporting procedure.

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

OCI has a dedicated Ethics and Compliance team to address among others, at a group-wide level, the identification of modern slavery, child labour and human trafficking risks.

### **Corporate statement**

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

5 May 2022