



## **Modern Slavery Statement**

### **PURPOSE**

This statement summarizes Tricon's commitments and actions taken to manage modern slavery risks in our operations and supply chain and promote freedom from all forms of child labor, forced labor, modern slavery, and human trafficking. It is intended to address Tricon's responsibilities under the UK Modern Slavery Act 2015 and similar applicable regulations.

### **SCOPE**

This statement is made on and behalf of Tricon Energy Ltd and its subsidiaries, including but not limited to Tricon Energy UK Ltd. This statement covers the financial year 2021 and was approved by the Board of Directors on May 6, 2022.

### **RESPONSIBILITIES**

This statement is prepared by the Chief Sustainability Officer and General Counsel. All Tricon employees are responsible for aligning with the commitments in our policies and processes related to human rights.

### **OUR BUSINESS**

Tricon is an industry leader in the global trade and distribution market. With our worldwide team of professionals, we have grown from a business that began with distribution of caustic soda, to a globally recognized company, trading hundreds of products. Our diverse team of 470+ employees spans 22 offices worldwide, adding value by providing logistics, risk management, financing, and market intelligence services.

In 2021, we conducted business with over 4,000 companies in more than 135 countries. Tricon's business relationships include:

- Product customers and suppliers (trading counterparties)
- Third party representatives, including agents, customs brokers, and freight forwarders
- Leasing and other logistics providers, including building leases, storage facilities, charters, and packaging companies
- Other goods and service providers, such as office supplies and professional services

To learn more about our values or our product lines, please click on the following links:

[Values](#)   [Chemicals](#)   [Plastics](#)   [Raw Materials and Fertilizers](#)   [Sustainable Products](#)

### **OUR HUMAN RIGHTS COMMITMENT**

Tricon is committed to respecting human rights in our operations and relationships with third parties. Our Responsible Sourcing Standard outlines our supply chain expectations to respect freedom from forced labor, modern slavery, and human trafficking.



## **MODERN SLAVERY RISK MANAGEMENT AND DUE DILIGENCE**

### *Risk Assessment*

Commodity trading companies like Tricon face numerous challenges in human rights and modern slavery due diligence, due to the type of supply chains and level of influence and leverage available. Tricon assesses key value chain risks related to modern slavery as part of its sustainability risk management process. We may also consider geography, transaction value, and characteristics of the third party in assessing risk. Potential risks include forced labor in the production or transportation of products purchased by Tricon. To help mitigate these risks, we put in place a due diligence system.

### *Policies and Processes*

Human rights, including modern slavery issues, are embedded in Tricon's internal management system, including the following policies, processes, and guidelines:

- Compliance Policies
- Sustainability Policy
- Worker Welfare Guidelines
- Responsible Sourcing & Product Stewardship Standard
- Sustainability Risk Management and Due Diligence Process

### *Screening of Business Relationships*

Tricon deploys a "Know Your Counterparty" (KYC) questionnaire to product suppliers and customers that included in 2021 certification to comply with Tricon's key policies and utilizes a supplementary due diligence questionnaire for higher-risk third party representatives. We strive to effectively integrate human rights in these processes.

### *Contract Requirements*

Tricon's standard purchase order clauses include references to human rights.

### *Training and Awareness*

Training and awareness are key parts of the due diligence program and include ethics training and basic human rights and worker welfare (including modern slavery) awareness in new employee onboarding.

### *Reporting Concerns*

The Tricon Listens Helpline is freely available to all stakeholders, internal and external, to report any issues related to modern slavery, including anonymously and with protections from retaliation.

### *Measuring Effectiveness*

Our Sustainability Risk Management and Due Diligence Process includes indicators to assess performance, such as screening of suppliers and grievance metrics. We communicate externally on key human rights indicators in our sustainability report.



## **NEXT STEPS**

We take a view to continuous improvement and learning and seek to collaborate with industry and other stakeholders to improve respect for human rights. For more information on our results and next steps, see our [sustainability report](#).

## **SIGNED BY**

A handwritten signature in black ink that reads 'Ignacio'.

Ignacio Torras  
Chief Executive Officer  
Tricon Energy, Ltd  
May 2022