

## Houghton Anti-Slavery Statement

### “Transparency in Supply Chain”

As a responsible corporate citizen, we at Houghton plc seek to ensure that quality and safety standards are maintained throughout our supply chain by well-treated and fairly compensated workers in accordance with current laws and regulations.

Houghton plc is a member of the wider Houghton group headquartered in Valley Forge, Philadelphia and is a leading producer and supplier of metal working fluids with customers in the aerospace, mining, steel, offshore, automotive components and beverage can industries.

We are committed to ensuring that there are no practices of modern slavery, human trafficking or forced and exploitative labour in any part of our business or our supply chains and have systems in place to:

- Identify risk areas in our supply chain.
- Mitigate the risk of slavery and human trafficking in occurring in our supply chain.

Houghton plc has a Code of Conduct which explicitly prohibits forced labour and child labour in the most explicit terms. The Code of Conduct applies to all companies in the wider Houghton Group as well as our customers, suppliers and distributors.

We currently believe the risk of slavery and/or human trafficking in our supply chain to be low. Our standard terms and conditions of procurement create a legally binding commitment on our suppliers to observe and enforce all the relevant requirements of the Modern Slavery Act. We will consider more intense measures, such as auditing or third-party verification for any suppliers that we determine are of medium or high risk in this regard. If we suspect a supplier is involved in such activities, we will conduct an inquiry and, if necessary, take corrective actions promptly.

Houghton plc takes a zero tolerance approach to slavery and human trafficking. We have a dedicated compliance team, which consists of representatives from the following departments:

- Human resources
- Supply chain and operations
- Finance

In addition a confidential whistleblowing helpline is made available to all of our employees to report any risks, wrongdoing or signs of modern slavery they may encounter whilst being active in our supply chain.

This statement is made pursuant to section 54(1) of the U.K. Modern Slavery Act 2015 and constitutes Houghton plc's anti-slavery and human trafficking statement for the financial year ending 31 December 2018.



Lee Bowditch

For and on behalf of Houghton plc