

<b>Policy No. ING GTC POL</b>	<b>Subject: INGEVITY MODERN SLAVERY POLICY</b>
<b>Effective Date: 06/01/2019</b>	<b>Revised Date: 9/7/2023</b>

Policy Name:	MODERN SLAVERY POLICY
Department/Group:	Supply Chain/Global Trade Compliance
Policy Scope:	All Ingevity Employees
Policy Region:	Global
Effective Date:	September 7, 2023
Pages:	1 of 6

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## PURPOSE

Ingevity Corporation and its subsidiaries (“Ingevity”) recognize that slavery, forced labor, servitude and human trafficking is a growing global issue. We are committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business.

This 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.

This policy is reviewed regularly to ensure it is appropriate, well communicated and promotes continued compliance with the Modern Slavery Act of 2015 and other applicable legislation. It is important to build increased trust with external stakeholders fostering the development of in-house learning, management capacity and leadership on human rights issues.

## BACKGROUND

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

## POLICY OVERVIEW

It is Ingevity’s policy to comply with Modern Slavery Act regulations applicable to our operations. We are committed to act ethically and with integrity in all our business dealings and relationships by implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chain operations.

Ingevity is committed to ensure there is transparency in our approach to tackling modern slavery throughout our supply chain, consistent with our disclosure obligations under the Modern Slavery Act. We expect the same high standards from all our contractors, suppliers and other business partners, and as part of our processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

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## DEFINITIONS

<i>Term</i>	<i>Definition</i>
<i>Modern Slavery</i>	Modern Slavery is a term used to encapsulate both offences in the Modern Slavery Act: slavery, servitude and forced or compulsory labor; and human trafficking. The offences are set out in section 1 and section 2 of the Act, which can be found at: <a href="http://www.legislation.gov.uk/ukpga/2015/30/section/1/enacted">http://www.legislation.gov.uk/ukpga/2015/30/section/1/enacted</a> and <a href="http://www.legislation.gov.uk/ukpga/2015/30/section/2/enacted">http://www.legislation.gov.uk/ukpga/2015/30/section/2/enacted</a>
<i>Slavery and Servitude</i>	<p>Slavery, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal ‘ownership’ of a person is not possible, the key element of slavery is the behavior on the part of the offender as if he/she did own the person, which deprives the victim of their freedom.</p> <p>Servitude is the obligation to provide services that is imposed using coercion and includes the obligation for a ‘serf’ to live on another person’s property and the impossibility of changing his or her condition.</p>
<i>Forced or Compulsory Labor</i>	Forced or compulsory labor is defined in international law by the ILO’s Forced Labor Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work, or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily.
<i>Human Trafficking</i>	An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does

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### *Child labor*

not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation. The meaning of exploitation is set out here: <http://www.legislation.gov.uk/ukpga/2015/30/section/3/enacted>.

Child labor is defined by international standards as children below 12 years working in any economic activities, those aged 12 - 14 engaged in more than light work, and all children engaged in the worst forms of child labor (ILO). The term “child labor” is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. Whether or not particular forms of “work” can be called “child labor” depends on the child’s age, the type and hours of work performed, the conditions under which it is performed, and the objectives pursued by individual countries.

## **ROLES AND RESPONSIBILITIES**

### **Ingevity Law and Compliance**

Ingevity Law and Compliance has overall responsibility for ensuring this policy complies with our legal and ethical obligations.

### **Ingevity Global Trade Compliance**

The Global Trade Compliance (GTC) organization has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. GTC also ensures adequate and regular training is provided to employees.

### **Ingevity Management**

Management at all levels is responsible for ensuring those reporting to them understand and comply with this policy and complete adequate and regular training on it and the issue of modern slavery in supply chains.

### **All Employees**

All Ingevity employees must read, understand and comply with this policy. You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to Global

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Trade Compliance at: [s-global-trade-compliance@ingevity.com](mailto:s-global-trade-compliance@ingevity.com) or to Law and Compliance at [legal@ingevity.com](mailto:legal@ingevity.com).

## **GUIDELINES ON POTENTIAL MODERN SLAVERY INDICATORS**

As it is difficult to list all indicators and red flags relating to modern slavery, follow is a list of scenarios for general guidance as to potential modern slavery indicators:

- An individual's movement is restricted – for instance they are not free to leave their accommodation as they please;
- An individual shares their accommodation with a significant number of others, often giving the appearance that such accommodation is overcrowded. This indicator becomes stronger if all/most of those in the accommodation work for the same company via the same contact/agency;
- An individual often appears malnourished and/or injured;
- An individual lacks what would be seen as “normal” belongings - for instance, they do not have a bank card or any form of ID;
- An individual is reluctant to engage with others and becomes evasive when the conversation turns to life outside of work, family, etc.; or
- In the context of our suppliers, one supplier offers a far lower price than others for no apparent reason. The risk of dealing with a supplier who is involved in modern slavery increases if that supplier is not an approved supplier.

## **REPORTING PROCEDURE**

We believe that the risk of modern slavery is low given the nature of our supply chain as well as our policies and compliance standards; however, you should still be aware of the possibility.

If you become aware of modern slavery, you must raise the matter with your manager, Law and Compliance or the Global Trade Compliance Organization. You may also make a report through the Ethics Line.

Employees are strongly encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

Furthermore, if: (1) you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within Ingevity or any tier of our supply chains constitutes any of the various forms of modern slavery, or (2) you believe that you have suffered any such treatment, raise the issue per the procedure detailed above.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one will be subject to discipline or retaliation as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

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## CONTROLS

1. Ingevity’s suppliers are screened for modern slavery risks prior to engagement. Refer to responsible sourcing guidelines managed by Global Trade Compliance organization.
2. As part of the CTPAT (Customs Trade Partnership Against Terrorism) we have developed a risk monitoring program to oversee our suppliers. Refer to **ING SC\_RM RISK MANAGEMENT PROGRAM GUIDELINES**, in the Global Supply Chain Portal.
3. Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for individuals who work in the supply chain, and regular training will be provided as necessary.
4. Ingevity’s expectations for compliance with all modern slavery laws is communicated to all suppliers at the outset of our business relationship with them through Ingevity’s requirement that all suppliers comply with our Supplier Principles of Conduct.

## ADMINISTRATION

If you have any questions or concerns about this policy or its related procedures please contact: [s-global-trade-compliance@ingevity.com](mailto:s-global-trade-compliance@ingevity.com).

This policy and its related procedures will be reviewed as required in the event of legislative changes.