



## **Modern Slavery and Human Trafficking Statement – Nexeo Plastics UK Limited**

(relating to the financial year ended 30 September 2021)

Modern slavery is a crime resulting in an abuse of human rights. Modern slavery can take various forms and is used to describe the crimes of slavery, servitude, forced or compulsory labour, and human trafficking.

At Nexeo Plastics UK Limited ("Nexeo Plastics" or the "Company"), we recognize our responsibility to uphold human rights and combat modern slavery and human trafficking in all its forms. This statement outlines our commitment to eradicating modern slavery within our operations and supply chains and the actions we have taken during the financial year from 1 October 2020 to 30 September 2021 to achieve this goal.

Nexeo Plastics has a proud history of corporate responsibility, and we value our integrity as a core and defining characteristic of how we operate. We believe that in today's global economy it is even more important for companies to act as responsible corporate citizens and to make their commitment known to responsible third parties. Whenever we are faced with difficult decisions in our business, Nexeo Plastics' goal is to always choose the most ethical course of action.

Nexeo Plastics has a Global Standards of Business Conduct ("GSBC") that outlines the Company's values and emphasizes the need to comply with applicable laws and regulations, including laws related to preventing modern slavery and human trafficking. This statement, together with our due diligence processes, is one of several steps we undertake to combat modern slavery and human trafficking in our supply chains. We also publish a Slavery and Human Trafficking Statement on our website at <https://www.nexeoplastics.com/about-us/corporate-compliance>.

### **Our organisation's structure, our business, and supply chains**

Nexeo Plastics is committed to ensuring that adequate controls are in place to prevent slavery and human trafficking from occurring in any part of our Company's business. From and as of 29 March 2019, the ultimate parent company of Nexeo Plastics is GPD Companies, Inc., a Delaware corporation, and a holding company formed by One Rock Capital Partners, LLC and its affiliates with the intent to create a leading group of global, value-added distributors. GPD Companies, Inc. (formerly known as Nexeo Plastics Holdings, Inc.) is based in The Woodlands, Texas, USA.

Headquartered in England, the Company has provided value-added sales and application development of thermoplastic resins for several years. Through its relationships with world class supply partners, the Company offers a robust array of superior performance products and solutions that meet the needs of diverse end users from leading and emerging industries such as the consumer, medical, automotive, food, and electrical sectors, among others.

Our scale, geographic reach, comprehensive product portfolio, and value-added services provide

us with a distinct competitive advantage by enabling us to provide a single-source solution for our customers.

For the financial year ended 30 September 2021, Nexeo Plastics had a turnover in excess of £42.4M.

## **What is our business?**

Nexeo Plastics is a leading global distributor of an extensive range of plastics resins and polymers. We deliver polymer resins products and provide innovative solutions and expertise in the sales and application development of thermoplastic polymers. We focus on creating new ways to enhance our customers' and partners' businesses. We know that even small changes can move the needle for a business. We seek to learn what our customers and suppliers need; develop processes, logistical and technical solutions; and work vigorously to help them achieve success while providing an exceptional customer experience.

We strive to build relationships that are principled, ethical, and transparent. We avoid compromising our integrity and safety and firmly believe that proper and virtuous business can be achieved in today's environment. We aim to be an honorable provider of services and to build an impeccable reputation with our customers.

## **Our strategy on modern slavery and human trafficking**

As an organisation, we are committed to comply with all applicable laws and regulations and to strongly support the prohibition of modern slavery and human trafficking both in any part of our supply chains and in any part of our business.

This Modern Slavery and Human Trafficking Statement reflects our commitment to implement, enforce and maintain effective processes and controls to ensure modern slavery and human trafficking are not taking place within our organisation, as well as to ensure the safety and protection of human rights; to embrace a diverse and inclusive workforce; to eliminate discrimination; and to avoid any complicity in forced labor, child labor, exploitation, trafficking, physical punishment, unfair work hours or compensation, limits to freedom of association or other human or labor rights violations.

Our Policies include:

- ✓ GSBC that outlines the Company's values and emphasizes the need to comply with applicable laws and regulations, including laws related to preventing modern slavery and human trafficking. Available on our website, the GSBC defines the foundational behaviors expected of all our employees. New hires at Nexeo Plastics are trained on our GSBC, and employees are re-trained on a regular cadence that we target to complete not less than once per year. We further encourage our suppliers to acknowledge the principles set forth in our GSBC and to commit to similar practices within their businesses through our Supplier Code of Conduct, also available on our website.
- ✓ Whistleblowing Policy. In line with the GSBC, all professionals working for Nexeo Plastics and any third parties involved with the Company may freely, safely, and confidentially report (i) any breaches or potential breaches of Nexeo Plastics' internal regulations, which include activities not in line with the GSBC or other Company policies and procedures; (ii)

any violations or potential violations of applicable laws, rules and regulations; and/or (iii) any other compliance, ethical, or business concerns. Nexeo Plastics provides alternative channels to encourage and facilitate the reporting of such conduct, while our internal processes regulate the investigation procedures to be followed and the rights and obligations of concerned individuals, to ensure that the reporting person(s) receive support and protection and that all reports are handled in an appropriate, confidential, and timely manner.

- ✓ Due diligence processes in relation to modern slavery and human trafficking. As part of our initiative to identify and mitigate risk:
  - (i) we build long-standing relationships with suppliers and communicate and embed our expectations of business behaviour from the outset,
  - (ii) we select and evaluate our supplier partners beyond economic criteria, including, without limitation, compliance with human rights, labour, and social standards,
  - (iii) we implement a policy of "knowing our customer/supplier" to ensure that we are contracting with appropriate businesses, and
  - (iv) we use supplier statements and questionnaires to identify and mitigate the risk of modern slavery and human trafficking. These tools are designed to be used within our supply chain to:
    - Identify and assess potential risk areas in our business and supply chains;
    - Mitigate the risk of modern slavery occurring in our business and supply chains; and
    - Monitor potential risk areas in our business and supply chains.

## **Behaviour of our supply chains**

We have a zero-tolerance approach towards modern slavery and human trafficking. To ensure all those in our supply chains comply with our values and ethics, we have a team of professionals who implement our compliance programs. These programs consist of:

- ✓ Company representatives interacting with prospective customers and suppliers, including active involvement from Legal, Compliance, Human Resources and Sales departments, as applicable.
- ✓ Applying the same high standards to all of our customers, suppliers and other sub-contractors, which include, but are not limited to:
  - Ensuring that they do not use slave labour, illegal child labour, or forced labour.
  - Ensuring that overall terms of employment are voluntary.
  - Ensuring that they do not engage in any abuse of human rights.
  - Ensuring that all applicable laws and regulations are being followed, including, but not limited to, laws relating to minimum age requirements, wages, and the number of hours worked in a given week.
  - Promptly identifying and reporting to Nexeo Plastics any suspected or actual violation of these requirements.

Failure to comply with applicable laws and regulations and our policies may result in a number of serious consequences, up to and including termination of contracts and the business relationship with Nexeo Plastics.

- ✓ We constantly monitor and seek to improve our integrity and compliance programs through our global Legal and Compliance team. We maintained these efforts during fiscal year 2020 and continued to focus on ensuring our suppliers' human rights policies were aligned with our Company's principles

### **Training on modern slavery**

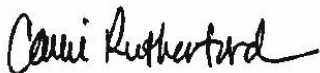
Compliance with applicable laws and regulations, which includes applicable laws related to modern slavery and human trafficking, is a topic that is incorporated into our annual training curriculum. We also constantly strive to clearly communicate our principles and the type of conduct we expect from our business partners, including our customers and suppliers, and seek to ensure our suppliers uphold principles that are consistent with our policies. In addition, we endeavor to ensure all of our supply agreements require our adherence to all applicable laws, rules, regulations and standards, including those related to the protection of human rights.

### **Our effectiveness in combating modern slavery**

Following a review of the effectiveness of the steps we have taken so far, we propose to maintain close relationships with suppliers to ensure visibility and alignment on key principles and compliance related to preventing violations of modern slavery and human trafficking. We also seek to continuously work to further develop and strengthen our efforts to respect and promote all proclaimed human rights, including the right not to be subjected to forced labor, slavery or human trafficking.

This statement is made in accordance with the Modern Slavery Act 2015 section 54 (1) and constitutes Nexeo Plastics' slavery and human trafficking statement for the financial year ending 30 September 2021.

Signed on behalf of the board of directors,



Carrie Rutherford  
Director  
Nexeo Plastics UK Limited