



Atotech statement on efforts to combat modern slavery and human trafficking in our supply chains

The UK Modern Slavery Act of 2015 (and other similar legislation) requires certain companies to disclose their efforts to prevent or eradicate slavery and human trafficking in their supply chains. These laws are designed to address such concerns by facilitating increased awareness about supply chain practices so that consumers and businesses may make informed choices and purchase products produced by companies that responsibly manage their supply chains. The Atotech Group (“Atotech”) supports these ideals and universal goals globally, no matter where Atotech conducts our business. For the purposes of the UK Modern Slavery Act, this statement addresses the 2021 financial year.

Environmental Social Governance (ESG)

As a specialty chemical technology company, Environmental, Social, and Governance (“ESG”) factors are integral to Atotech’s business. We take our responsibility to promote ESG principles and best practices very seriously.

Internal Accountability Standards

Atotech is committed to strict standards of corporate governance and ethics. Compliance is a non-negotiable part of our business. As part of Atotech’s firm commitment to these values, it has implemented, and continue to refine, a robust compliance program which is subject to ongoing review and improvement. To make Atotech a responsible business entity, we have best practices in place for superior production processes, human resource management, and collaborations with the local communities.

Modern Slavery issues are also addressed by Atotech’s Policy on Conflict Minerals Sourcing, which bans the purchase of specific minerals originating from the DRC as well as the nine adjoining countries Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, South Sudan, Zimbabwe, Uganda, and Zambia, where there is an enhanced risk of slavery and human trafficking taking place.

This commitment to strict standards of corporate governance and ethics is also reflected in Atotech’s Code of Conduct, Anti-Corruption Policies and other corporate procedures. Our clear and transparent guidelines provide instruction on personal and business behavior and regulate corporate governance and ethics as well as the responsible management of supply chains. Atotech’s Code of Conduct expressly states that Atotech expects our suppliers, contractors and business partners to apply the same standards. It is available on our website at

<https://www.atotech.com/code-of-conduct>

Atotech’s Code of Conduct demands that Atotech’s directors, officers, employees and contractors maintain strict ethical standards in carrying out business activities, and requires compliance with all applicable laws, rules and regulations. In 2019, Atotech updated its Code of Conduct.

The Code of Conduct states, among other duties, that:

1. Atotech complies with all applicable laws, which includes the UK Modern Slavery Act of 2015.
2. Atotech acknowledges the principles of the Universal Declaration of Human Rights, which prohibits slavery and servitude (Article 4).
3. Atotech acknowledges the convention on Forced Labor of the International Labor Organization which prohibits all forms of forced or compulsory labor.

In addition to the above, Atotech is committed to respecting all internationally recognized human rights in our business operations.

The policies referred to above require all Atotech employees to comply with modern slavery legislation and to report any concerns or suspicions they may have in relation to the potential for modern slavery or human trafficking in any parts of our supply chain.

Employees have several internal channels available to seek guidance on compliance with modern slavery legislation, or to report concerns. In addition, Atotech maintains an externally-managed, confidential (anonymous if requested) whistleblower hotline that may be used to report, among other things, any concerns or suspicions regarding modern slavery or human trafficking in Atotech’s supply chain. The whistleblower hotline is available for employees and partners on Atotech’s website at:

<https://www.atotech.com/responsibility/compliance/>

A well-trained network of Integrity Officers investigates all reports in a timely manner and confirmed violations are addressed with corrective actions.

Verification

Atotech endeavors to comply with all labor and employment laws in the countries in which it operates and does not knowingly engage in any activities that constitute human trafficking, slavery, compulsory labor or unlawful child labor, and we expect our suppliers to follow the same ethical practices.

Supplier Certification

We perform due diligence checks on our future suppliers, including analyses of multiple aspects of the supply chain. These checks have been extended in 2021, while introducing additional screening-methods. Potential suppliers must confirm in writing that they adhere to the principles and ethical values expressed in Atotech’s Supplier Code of Conduct, including those intended to combat slavery and human trafficking. Atotech’s Supplier Code of Conduct was published in 2020. It is available on our website at

<https://www.atotech.com/supplier-code-of-conduct>

Auditing of Suppliers

Atotech’s standard purchase agreements and General Purchase Conditions expressly reserve the right to conduct on-site audits of our suppliers to evaluate compliance with Atotech’s Code of Conduct and Atotech’s Supplier Code of Conduct.

External audit

A customer-initiated RBA audit of an Atotech division has been conducted in 2021. The outcome of the audit: No findings related to non-compliant behaviors in terms of labor force.

Internal Training

Atotech has a robust compliance training program. The training program includes on-site trainings and several E-Learnings on compliance topics in multiple languages. Atotech annually provides refresher courses on all relevant topics. All employees are required to complete the trainings regarding Atotech’s compliance procedures.

In Atotech business meetings, compliance topics are regularly presented and discussed. Atotech top managers regularly communicate compliance towards all staff to raise awareness to these issues.



Geoff Wild
Atotech CEO