

## Anti-slavery & Human Trafficking Global policy

### Statement

Orbia strictly prohibits the use of modern slavery in our operations and supply chain. We are committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organization or in any of our supply chains. We expect that our suppliers will hold themselves and their own suppliers to the same high standards.

### Purpose

This Policy provides guidance for compliance with anti-slavery and Human trafficking regulations and outlines the measures to prevent such offences and design remedial actions based on the best interests of the child and their rights.

### Scope

This Policy applies to any individual working for, on behalf of Orbia worldwide regardless of the place where Orbia operates or maintain business. Ignorance or misunderstanding of the rules is no excuse for violations.

### Definitions

1. **Modern Slavery:** is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Victims are coerced, deceived and forced against their free will into providing work or services. Modern slavery is a crime and a violation of fundamental human rights.
2. **Human Trafficking:** is where a person arranges or facilitates the travel of another person with a view to that person being exploited.
3. **Child Labour:** means all work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that (i) is mentally, physically, socially or morally dangerous and harmful to children; and (ii) interferes with their schooling.

### Provisions

We expect everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

1. We have a zero-tolerance approach to modern slavery in our organization and our supply chain. The prevention, detection and reporting of modern slavery in any part of our organization or supply chain is the responsibility of all those working for us or on our behalf. Those working on our behalf must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
2. We are committed to gaining a clearer understanding of how modern slavery operates in different contexts, of who is affected and how, and of the risks of modern slavery existing within our industry.

3. We are committed to having a clear and transparent company statement, which is reviewed regularly and is communicated to our employees, is posted on our website and which sets out the steps taken to prevent modern slavery and trafficking and the effectiveness of those measures.
4. We are committed to training relevant employees in modern slavery, how to identify it in practice and how to respond. We are committed to ensuring that our employees understand and adhere to this policy and non-compliance with it is a disciplinary offence. This policy will be updated and re-communicated to all staff as appropriate, at which time they will re-affirm their adherence to its principles, including our zero-tolerance of all forms of modern slavery.
5. We are committed to engaging with our industry, stakeholders and direct suppliers to address the risk of modern slavery in our operations and supply chain.
6. As part of our contracting processes of Third parties, we will include a specific prohibition against the use of modern slavery and a requirement to comply with our Code of Conduct, which sets out the minimum standards required of our suppliers to combat modern slavery.
7. Our own recruitment processes include safeguards against modern slavery. The employment and recruitment agencies and other third parties supplying workers to our organization are required to comply with our Code of Conduct. Suppliers engaging workers through a third party are also required to obtain third parties' agreement to adhere to the Code.
8. As part of our Third-Party Program, we audit suppliers, based on risk, for their compliance with our Code of Conduct. We aim to work with suppliers to remediate incidents of non-compliance and may terminate the relationship in response to gross, persistent or deliberate failures.

## Amendments

Deviations or changes to this Policy require the approval of Orbia Vice President & General Counsel.

## Reporting A Concern

Because we all have a stake in Orbia's success, it is in all of our interest to help ensure that our business is conducted to the highest ethical standards, and that our reputation remains untarnished. For this reason, we strongly encourage you to report any situation you know or suspect about that may involve illegal, unethical or otherwise improper business activity, as well as all instances of employee violations of this or any other of the Orbia policies. Doing so will allow the company to address the issue and take appropriate corrective action.

If you have a good-faith belief or concern related to improper or illegal conduct, you should immediately bring it to the attention of Orbia:

- Logging onto [this link](#) from any computer with an Internet connection and clicking on the Orbia Whistleblower Line link to file a web report.

Orbia will not tolerate retaliation against you due to your report or participation in any internal investigations, as long as you have acted in good faith and believe what you reported to be true.

Retaliation may be grounds for discipline up to and including dismissal, subject to applicable local laws. The company will treat any good-faith reports or discussions in confidence consistent with legal requirements and subject to the need to conduct a thorough investigation where appropriate. In certain cases, and consistent with applicable laws, information may be shared with local law enforcement or other authorities.

