

May 22, 2024

INEOS Canada Partnership Bill S-211 Modern Slavery Statement for the Fiscal Year of 2023

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff. This statement outlines the approach and initiatives by INEOS Canada Partnership to identify and address the risks forced labour and child labour in its business operations and supply chains during the financial year commencing January 1, 2023, and ending December 31, 2023.

A) Structure and Activities of Supply Chains

INEOS Canada Partnership is a global manufacturer of petrochemicals, speciality chemicals and oil products. The Joffre Linear Alpha Olefins (LAO) plant sits on approximately 46 acres of land located about 20 kilometres east of Red Deer, Alberta, Canada. Built and commissioned in 2001 by BP/Amoco, the plant was then purchased from BP in December of 2005 by INEOS. The INEOS plant at Joffre is part of a larger petrochemical complex.

As part of the INEOS Oligomers Business, the Joffre LAO Plant uses INEOS's Ethylene Oligomerization Process (modified Ziegler process) to produce LAO. The family of LAOs produced are typically clear, water-white liquids which are then used for a variety of intermediate products, including: as a co-monomer in the production of polyethylene, as raw material to manufacture polyalphaolefins (PAO) for synthetic lubricants, as a building block for the production of surfactants, as Amodrill® synthetic based drilling fluids and for a host of other intermediate and final products.

B) Policies and due diligence processes in relation to forced labour and child labour:

INEOS respects the rights in the International Bill of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work. We recognise the right to collective bargaining and freedom of association, and we work to prevent any instances of forced or compulsory labour, child labour, or employment discrimination in our value chains. We require our suppliers to protect human rights and ensure their employees are safe and well-treated.

We work with responsible suppliers that comply with applicable laws and adhere to internationally recognised environmental, social and governance (ESG) standards, including those set forth in our Code of Conduct and SHEQ policy. INEOS believes that workers in the value chain deserve a fair and ethical workplace and must be treated with dignity and respect. Through our Supplier Code of Conduct, we require our suppliers to protect human rights and provide a safe and fair working environment for employees by meeting standards in the following areas:

- Health and safety
- Anti-discrimination, anti-harassment, and abuse
- Prevention of forced labour and human trafficking
- Prevention of child/underage labour
- Avoidance of conflict minerals



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- Fair working conditions
- Freedom of association and collective bargaining
- Modern slavery and people trafficking

INEOS takes a zero-tolerance approach to modern slavery in the supply chain. Most of INEOS Canada Partnership's activities are carried out in Canada and can be considered at lower risk of modern slavery. But we recognise our responsibility to engage with value chain partners and staff, and alert them to the risks of slavery, however small, in their businesses and supply chains and help them act on it.

SCOC

Our Supplier Code of Conduct defines and summarises what we expect of our suppliers, suppliers' subsidiaries and affiliates, their subcontractors or other business partners' contractors and agents, regardless of location or background in terms of CSR.

The Group-wide Supplier Code of Conduct is part of INEOS' commitment to CSR; it can be found on our website in 22 languages. Each of our businesses, covering all INEOS sites worldwide, is expected to present the code and an associated questionnaire, available in 11 different languages, to all suppliers to monitor their CSR and ESG performance. All replies are automatically updated into a central database accessible to all INEOS businesses.

Regarding labour practices and human rights, the Supplier Code of Conduct states:

Ensuring that human rights are respected and workers are treated well in our value chains is of great importance to INEOS. Suppliers shall ensure that the workplace is fair and inclusive and that they respect the rights set out in the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and that they enable their employees and other stakeholders to report concerns or potentially unlawful practices at the workplace.

- **Anti-discrimination, anti-harassment and abuse**
Suppliers shall not discriminate against any staff member based on race, colour, ethnic origin, religion, sex, gender, age, national or social origin, sexual orientation, gender identity, marital status, disability, political affiliation or union membership, in hiring and other employment practices such as salary, promotions, rewards, access to training, employment termination and retirement. Suppliers shall provide a workplace free of harassment, corporal punishment, coercion and abuse. Any threats or other forms of intimidation are prohibited.
- **Prevention of forced labour and human trafficking**
Suppliers shall ensure that all work is voluntary. Employment contracts shall be easily understood by the employees and they shall have the right to terminate their employment subject to giving reasonable notice or in accordance with local law. Suppliers shall not traffic persons or use any form of forced, bonded, slave, or prison labour. Employees should not surrender any personal identification documents as a condition of employment.

- **Prevention of child/underage labour**
Suppliers shall employ only staff who are at least 15 years of age or the applicable minimum legal age, whichever is higher. For persons under the age of 18, suppliers shall specify presence requirements, monitor health, working conditions, hours and working time and shall not employ such persons for hazardous work or in a manner that is economically exploitative, interferes with education or is harmful to health, physical, mental, spiritual, moral or social development. Legitimate workplace apprenticeship programs for educational benefit are acceptable, provided that they are consistent with Article 6 or 7 of ILO Minimum Age Convention No. 138.
- **“Conflict” minerals**
Suppliers shall ensure that they do not supply materials and products containing minerals that contribute to conflict by applying the due diligence procedures set out in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- **Working conditions**
Suppliers shall comply with all applicable laws, regulations and/or collective bargaining agreements relating to working conditions, hours, days of rest, wages and salaries, which must correspond to locally mandated living wages. Suppliers shall ensure sufficient processes to prevent physical fatigue and mental exhaustion.
- **Freedom of association and collective bargaining**
As the law provides, suppliers shall allow employees to freely associate with others and organizations of their choice and to seek representation to for the purposes of collective bargaining. Suppliers shall allow employees to express their concerns about working conditions or potentially unlawful practices without threats of reprisal or harassment.
- **Unlawful eviction**
Supplier shall not participate in or contribute to the unlawful eviction and unlawful taking of land, forests and waters.
- **Security forces**
Supplier shall ensure that security forces, if used for the protection of Suppliers’ projects or assets, consistently operate within the bounds of applicable laws and are being properly instructed and monitored to avoid torture and cruel, inhumane or degrading treatment, injury to life or limb, or impairment of the right to organize and the freedom of association.

Anti-Slavery Act

Modern slavery is a crime and a gross violation of fundamental human rights. INEOS has a zero-tolerance approach to modern slavery and we are fully committed to preventing slavery and human trafficking in our corporate activities. We are also committed to ensuring there is transparency in our own businesses and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the UK Modern Slavery Act 2015 and equivalent laws in other countries.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery 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.

Among the other policies that we consider give us strength in avoiding modern slavery or human trafficking under the Act in our businesses are the Anti-Bribery & Corruption Policy.

As part of our initiative to identify and mitigate risk, over the past year we have been putting in place systems to:

- include anti-slavery checks in the due diligence process for on-boarding new suppliers
- monitor potential risk areas in our supply chains
- conduct selective supplier audits
- include due diligence regarding anti-slavery in M&A activity
- protect whistle blowers

C) Forced labour and child labour risks

The majority of the INEOS' activity is carried out in the EU and North America which we consider to be low risk in relation to Forced/Child Labor. Nevertheless, INEOS recognizes its responsibility and has alerted relevant staff to the risks of Forced/Child Labor, however small, in their businesses and across the wider supply chain. Those staff are expected and encouraged to report concerns to management, who will then act upon them.

INEOS suppliers are vetted and approved based on their acceptance to the INEOS Supplier Code of Conduct. The policy states that:

Suppliers shall employ only staff who are at least 15 years of age or the applicable minimum legal age, whichever is higher. For persons under the age of 18, suppliers shall specify presence requirements, monitor health, working conditions, hours and working time and shall not employ such persons for hazardous work or in a manner that is economically exploitative, interferes with education or is harmful to health, physical, mental, spiritual, moral or social development. Legitimate workplace apprenticeship programs for educational benefit are acceptable, provided that they are consistent with Article 6 or 7 of ILO Minimum Age Convention No. 138.

D & E) Remediation Measures for forced labour & loss of income

Relevant INEOS staff are required to be trained on INEOS policies pertaining to Forced/Child Labor & Human Rights. Training is an on-going process to ensure familiarity with current policy.

Our Supplier Code of Conduct 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 Forced/Child Labor is not taking place anywhere in our supply chains.

F) Training

To maintain awareness and ensure a high level of understanding of the risks of modern slavery and human trafficking across our businesses we have trained relevant members of staff and our Anti-slavery Policy is available to all staff.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes INEOS's slavery and human trafficking statement for the financial year ending 31 December 2023 including for all of its in-scope subsidiaries as listed.

Through Thomson Reuters TR Training, the following compliance learning courses are available to the Site Director, Site Controller, Purchasers, Procurement Administrative Coordinator, Financial Analyst, Marketing Development Manager, Procurement Manager, Warehouse Technician and Sr. Process Engineer:

- Sanctions (Global)
- Modern Slavery
- Competition Law / Anti-Trust
- Tax Evasion
- Anti-Bribery & Corruption
- Anti-Money Laundering
- Modern Slavery

G) Assessing Effectiveness

INEOS suppliers are required to review and accept INEOS' Supplier Code of Conduct, along with submitting appropriate data pertaining to their policies and procedures pertaining to Labor & Human Rights. Supplier information is review by relevant INEOS staff to identify potential red flags and/or opportunities for improvement and to identify the appropriate corrective actions needed.

INEOS Oligomers

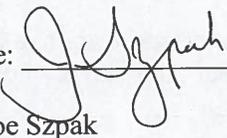
INEOS Canada Partnership

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Approval

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act for the financial year ending December 31, 2023. It has been issued on behalf of INEOS Canada Partnership and approved by Site Director, Joe Szpak.

Signature: 

Name: Joe Szpak

Title: Site Director

Date: May 22, 2024

