

ColorMatrix Europe Limited - Modern Slavery and Human Trafficking Statement

This statement has been published in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the modern slavery and human trafficking statement of ColorMatrix Europe Limited (“ColorMatrix”) and covers the 2023 financial year.

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

We are committed to improving our practices to combat slavery and human trafficking.

Update on last year; Risk – Identify, Assess, Mitigate, Monitor

In our previous statements ColorMatrix committed to identifying and mitigating risk through our supply chain and improving our internal controls.

During 2023 we continued to work with our key supplies in order to clarify our expectations regarding their compliance with the Modern Slavery Act 2015 and any other applicable anti-slavery laws.

We are reviewing, with a target to implement for 2024, appropriate KPI's for Avient's global approach for supply chain due diligence.

Organisational structure

ColorMatrix Europe Limited are global innovators in advanced colorant, additive and dosing technologies that are engineered to improve the performance, processing, aesthetics and sustainability of plastic products. Its site in Knowsley UK employs ~140 associates in manufacturing, technology, regulatory, marketing and admin with approximately 60% of sales supplying affiliates in Europe, India and China for onward sale to customers locally.

ColorMatrix Europe Limited is a wholly owned indirect subsidiary of Avient Corporation, a U.S. publicly-traded corporation listed on the New York Stock Exchange with global headquarters in Avon Lake, Ohio, United States. ColorMatrix is part of the Color, Additives and Inks segment.

Avient and its global direct and indirect subsidiaries and affiliates, including ColorMatrix (“Avient”), are intermediate suppliers of specialty polymers and related raw materials designed to meet the specifications of its manufacturing customers. Avient does not manufacture or sell totally finished articles to be sold as consumer goods. In sourcing its own raw materials and in distributing products manufactured by others, Avient is required to meet the specifications prescribed by its customers.

More information about Avient and its locations can be found on our website – www.Avient.com

Our policies on slavery and human trafficking

The Avient Code of Conduct establishes a clear set of ethical and behavioral standards for the employees of Avient for our business conduct. We strive to uphold a consistent global standard of ethical conduct, while respecting the cultures and business practices of the countries and local communities with which we interact.

Avient forbids any form of forced labor or human trafficking in connection with Avient's business and we expect our suppliers, agents, and distributors to prohibit the same. We also strive to use supply chain partners whose sources and processes respect basic human rights, and whose trade does not directly or indirectly cause human rights violations, wherever they are.

A full copy of Avient's Code of Conduct is available in over 20 languages and can be found [here](#):

Avient's Position on Human Rights can be found [here](#)

Training

To mitigate against the risk of non-compliance with our policy, Avient requires all associates to complete mandatory Code of Conduct training. Furthermore, based on assessment of global risk areas, we supplement training to certain functions/groups to provide deeper dives and reinforcement on certain topics, including but not limited to the topic of human rights.

Avient strives to uphold a consistent global standard of ethical conduct, while respecting the cultures and business practices of the countries and local communities with which we interact. If we fail to live up to these expectations, we want our associates, vendors and stakeholders to let us know. The Avient ethics hotline is available globally to make a web-based or telephonic report, with multi-language capabilities, 24 hours a day, seven days a week. Avient has a zero tolerance clause within its Code of Conduct against any type of retaliation towards employees who, in good faith, raise concerns or reports misconduct. The hotline is operated by an external professional service company and ensures anonymity.

Supplier Due Diligence

ColorMatrix has a wide ranging supply chain that supports our European operations. Our supply base currently includes 63 suppliers: 70% located in the UK, 12% in the EU and the remaining 18% split between China, USA and India. Our total raw material and packaging spend for 2023 was ~\$21 Million.

Organisations are being challenged to operate in a more transparent fashion and are expected to disclose more information than ever before; with that in mind, ColorMatrix intends to drive greater disclosure from our suppliers in order to better understand our supply chain and to mitigate any risks related to modern slavery.

Additionally to the above, the business implemented necessary changes related to 'Brexit' and continue to highlight any areas of risk within our supply chain, processes and procedures related to this.

In the Avient Supplier Code of Conduct, which is applicable to the suppliers of ColorMatrix, Avient prescribes that its suppliers should not use slavery or human trafficking in connection with any product supplied to Avient. Avient currently does not engage in verification of its supply chains to evaluate and address risks of human trafficking and slavery, nor does it currently conduct audits of its suppliers' compliance with company standards for trafficking and slavery in supply chains. Avient currently does not require direct suppliers to certify that the materials incorporated into their product comply with the laws regarding slavery and human trafficking.

Supplier adherence to our values

We are committed to doing business the right way, including without limitation, conducting business ethically and minimizing the risk of slavery and human trafficking in our own business and in that of our suppliers as much as possible.

In order to improve our internal processes and bring ColorMatrix in line to the global Avient system a more effective working process for identifying risk and measuring progress through KPI's is targeted to be implemented through 2024, which will allow us to improve the mitigation and monitoring of risk across our suppliers.

Our effectiveness in combating slavery and human trafficking

In 2024 the following key performance indicators (KPIs) will be used to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains

- 100% completion of the Code of Conduct for all associates

Our on-going commitment

As part of our modern slavery strategy we will continue to monitor the progress we have made and build on our achievements and initiatives in the next financial year. Our procurement and compliance teams will continue to focus on identifying and addressing any potential risks in our supply chain and the business will continue to provide awareness and training to all of its employees.

We are committed to doing business the right way, including without limitation, conducting business ethically and to minimizing the risk of slavery and human trafficking in our own business and in that of our suppliers as much as possible

This statement is approved by ColorMatrix by its board of directors.

Zach Crawford

On behalf of the Board of Directors for ColorMatrix Europe Limited

Signature: 

Date: 6th June 2024