

Oleon Modern Slavery Statement 2022

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor, and human trafficking, all of which include the deprivation of a person's liberty by another to exploit them for personal or commercial gain. Oleon has a zero-tolerance approach to slavery and human trafficking in any shape or form. As such, Oleon is committed to (i) act ethically and with integrity and transparency in all its business dealings and relationships, and (ii) implement effective systems and controls to ensure that any form of slavery and human trafficking are not taking place anywhere, either within its own business or in any of its supply chains.

Organization's structure

Oleon is a leading global provider of oleochemical solutions headquartered in Ertvelde, Belgium. Oleon has 6 production plants in Belgium, France, Germany, Malaysia, and US and 11 offices in Belgium, Brazil, China, France, Italy, Germany, Malaysia, Norway, UK, and USA. In 2022 Oleon achieved a turnover of around €1.2 billion and employs approximately 1,000 people globally.

Oleon is part of Avril, a financial and industrial organization in the vegetable oils and proteins sector with activities in food, feed, biofuels and oleochemistry. Avril has its headquarter in Paris, France. The purpose declaration of Avril is "Serving the Earth". For Avril, "Serving the Earth" means to help meeting two major challenges: the climate emergency and population growth, which is putting more pressure than ever on our planet's resources. Taking on these challenges means we must change our eating habits, our farming practices and our energy choices. The company has set six sustainable development commitments. In 2017, Avril became a signatory of the United Nations Global Compact, joining the world's largest voluntary corporate sustainability initiative.

Our business

Oleon's operations are divided in two categories: base oleochemicals and derivatives. Oleon markets one of the most complete ranges of oleochemical products. Oleon offers its oleochemical building blocks and ingredients in a large variety of markets such as: crop protection, cosmetics, industrial ingredients, lubricants, nutrition, oilfield, coatings, detergents and many more. Known trade names of its products are Jolee®, Radia® and Well.O®.

Our supply chains

Oleon sourced raw materials and supplies from more than 1,800 suppliers in 2022. The highest volume sourced by the company is from Europe, followed by Asia.

Our policies on slavery and human trafficking

Oleon is committed to ensuring that there is no form of slavery or human trafficking in its supply chains or in any part of its business. **Avril's Code of Ethics** and **Oleon's Code of Ethics** represent the standard

to which all employees of Avril and Oleon are required to adhere to Oleon aims to work exclusively with suppliers that uphold the same standards and principles. These standards are found in **Avril's Supplier Code of Conduct** (SCOC). This code complies with the local laws and is in line with key international standards such as the ILO Conventions, the OECD Guiding Principles, the UN Global Compact Principles, and the Universal Declaration on Human Rights.

Due diligence processes for slavery and human trafficking

Oleon is aware that a risk exists that any form of slavery may occur in its supply chains. Oleon has defined a SCOC in 2017. In 2018, a first group of selected strategic suppliers were asked to sign the SCOC. Today, it is mandatory for suppliers to acknowledge this Code to do business with Oleon. To monitor the social and environmental performance of its suppliers, Oleon and Avril are working together with the sustainability rating platform EcoVadis (www.ecovadis.com). In 2019, Oleon launched the "Supplier CSR Monitoring" project which combines the SCOC and the EcoVadis assessment. Suppliers are split in two groups: non-raw materials and raw materials. Non-raw material suppliers with an annual spent of over €50.000 will be automatically rolled into this project. All raw materials suppliers, irrespective of spent, will also be part of the project. At the end of 2022, 86% of Oleon's selected suppliers meeting the earlier criteria have been assessed by EcoVadis. Of these, 77% have been awarded a silver medal, proving their progress in sustainability. The results of the EcoVadis assessment allow Oleon to identify areas of improvement and ask for corrective measures from its suppliers if necessary.

Our effectiveness in combating slavery and human trafficking

Apart from the yearly supplier assessment in collaboration with EcoVadis, Oleon relies on the EcoVadis "360° Live News Monitoring" system to stay up to date of any CSR related news of Oleon's assessed suppliers. In case of a major misconduct or breach, the assessment results of the supplier can be reviewed by EcoVadis. If necessary, Oleon can ask the supplier for a plan with corrective measures. Oleon has created a long term "Global Supplier CSR Program" to go beyond supplier CSR compliance. Further steps may include working together with suppliers on associated sustainability issues linked to their activities, life cycle assessments, joint sustainability projects and onsite sustainability audits.

This statement, in accordance with Section 54 of the UK Modern Slavery Act of 2015, sets out the measures Oleon has taken during the financial year ending on 31 December 2022 to fulfill its policies and commitments and ensure that any form of slavery and human trafficking are not taken place in its own operations and its supply chains.