

VESUVIUS plc

Human Rights Policy

(as approved by the Vesuvius plc Board on 7 December 2016)

1. Introduction

The Vesuvius Code of Conduct (“**Code**”) sets out our required standards of legal and ethical behaviour, emphasises our commitment to ethics and compliance with the law.

This policy (the “**Policy**”) supplements the principles set out in the Code, and has been produced to provide guidance on the Group’s approach to human rights issues. It reflects the principles contained within the United Nations (UN) Universal Declaration of Human Rights, the International Labour Organisation’s (ILO) Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the requirements of the UK Modern Slavery Act 2015.

The aim of this policy is to set out the principles for our actions and behaviour in relation to human rights and to provide guidance to those working for us on how we approach these issues.

We recognise that this is a process subject to change and consequently this policy will be updated as appropriate.

The Policy will be translated into local languages, as appropriate, to ensure clear communication of the company’s stance on human rights worldwide.

2. Scope

The Policy applies to all employees of Vesuvius plc and its wholly-owned subsidiaries. The ethical requirements of the Policy apply to all other persons acting on behalf of or representing Vesuvius.

If this Policy and/or procedures are more stringent than local laws, we will adhere to our own standards set out herein. If local law is more stringent than our principles, we will comply accordingly, using the Policy as a guideline.

3. Policy

3.1 Employees: We are committed to respect the human rights of our employees by promoting an environment in which:

- (a) individual human rights issues are identified and upheld; and
- (b) a uniform worldwide approach is taken to human rights

We will communicate this Policy to our employees to enable them to be aware of, respect and protect human rights - both in the workplace and in any local communities directly impacted by our operations.

3.2 Local communities: We seek to respect the human rights of, and to develop an understanding of, the cultures, customs and values that prevail in the local communities in which we work by developing an inclusive and open dialogue with any people affected by our operations.

4. **Specific Commitments**

4.1 Health and Safety

Health and Safety: Vesuvius is committed to work towards its goal of zero injuries in the workplace whilst pursuing Vesuvius business. We strive to provide an environment of general wellbeing in the workplace as endorsed by our on-going safety campaign.

4.2 Labour

Freedom of Association: Vesuvius respects the principles of freedom of association and the effective recognition of the right to collective bargaining.

Forced or Compulsory Labour and Human Trafficking: Vesuvius opposes the use of, and will not tolerate the use of forced or compulsory labour and/ or human trafficking in our business, or in our supply chain.

Child Labour: Vesuvius opposes the use of, and will not tolerate the use of child labour in our business, or in our supply chain.

Unlawful Discrimination in the Workplace: Vesuvius is committed to ensuring that each employee and potential employee is treated with fairness and dignity. Accordingly, any discriminatory practice based on race, colour, gender, sexual orientation, age, religion, ethnicity, national or social origin, property, political or other opinion, disability, birth or any other basis (as defined by the laws of each country in which we operate) will not be tolerated. The Company seeks to provide each employee with equal opportunity for advancement without discrimination.

Harassment and Violence: Vesuvius is committed to promoting a work environment free of any form of harassment, exploitation, abuse or violence, as defined by the laws of each country in which we operate.

Competitive Compensation and Remuneration: Vesuvius aims to pay competitive wages based on local market assessments and seeks to provide compensation commensurate with an employee's skills and experience.

Conditions of Employment: Vesuvius complies with all laws regarding conditions of employment including basic and over-time working hours, and will abide by agreements negotiated with employee representatives.

Proportionate Security Arrangements: Where Vesuvius uses armed security to protect its worldwide factories or offices, we will seek to ensure that our engagement with public and private security providers follows international standards (the Voluntary Principles on Security and Human Rights), balancing the safety of our employees and human rights.

5. **Governance and accountability**

The Vesuvius Board of Directors has overall responsibility, and the CEO specific responsibility for the implementation and monitoring of this Policy. Reports will be made to the Board of Directors where issues that arise under this policy have an impact on the Group or its business.

Our stance on human rights will, in future, be reported in our Annual Report and Accounts, available at: www.vesuvius.com

The measures we are undertaking to analyse and mitigate the risk of forced labour and human trafficking in our business and supply chain will be published annually in a transparency statement complying with the requirements of the UK Modern Slavery Act 2015.

6. **Implementation**

This Policy is the high level statement on human rights for Vesuvius plc. Where necessary, other standards and procedures will be developed and maintained, on specific human rights matters

This Policy will be supported by training as part of the worldwide on-going compliance and code of conduct training.

Third parties: We will communicate our policy on human rights when engaging, or contracting, with subcontractors, suppliers or customers, to our joint ventures (where we do not have equity control) and to other partners and encourage their support of the principles and commitments outlined in this policy.

7. **Review and monitoring**

This Policy will be reviewed regularly. We will also monitor the way in which it is followed.

Vesuvius wishes to foster an environment in which there can be full and free discussion of issues that concern our employees. Consequently, employees are encouraged to discuss with management any concerns about behaviours or decisions which conflict with the letter or spirit of this policy. We welcome this feedback and dialogue. If an employee has concerns about any non-compliance with this policy or other ethical issues in the Company's business, they can be raised in confidence with any member of management or by using the confidential and independently hosted worldwide Speak Up Helpline (whistleblowing) service – where, with the express permission of the caller or email correspondent, the service provider will report any matter raised to the General Counsel and Compliance Director.

Where breaches of the Policy are suspected or uncovered, an appropriate investigation will be conducted, and where applicable, remedial action taken. Breach of this Policy can represent serious misconduct and may result in disciplinary action being taken.