

## **Vesuvius Statement on the Prevention of Slavery and Human Trafficking (2023)**

### **Our business operations and organisation structure**

Vesuvius plc is a public limited company, listed on the London Stock Exchange, and a constituent of the FTSE 250 index. Vesuvius develops and manufactures high-technology products and solutions for supply to the steel and casting industries under the brand names Vesuvius and Foseco. Vesuvius has a global presence with operations in 40 countries delivering cost competitive products and time efficient service. Vesuvius has 68 sales offices, 55 production sites and places industry experts at many customer locations. Vesuvius' business is operated through 2 divisions – Steel and Foundry – with the Steel Division organised around three product lines – Steel Flow Control, Advanced Refractories and Digital Services. For more information on Vesuvius' business please refer to our [2022 Annual Report](#).

### **Policies relating to slavery and human trafficking**

Vesuvius is committed to protecting the health and safety of our employees, customers, suppliers, contractors, visitors and others affected by our operations. We do not condone Slavery or Human Trafficking. We will never knowingly engage in these activities in our own business and will not tolerate them if we find them within our supply chain. Vesuvius' [Code of Conduct](#) expressly prohibits forced or child labour in our operations. This is supported by our [Human Rights Policy](#) which reflects the principles contained within the United Nations Universal Declaration of Human Rights, the International Labour Organisation's Fundamental Conventions on Labour Standards and the United Nations Global Compact.

### **Our supply chain due diligence procedures**

Vesuvius sources raw materials, other tradeable goods and ancillary supplies for our manufacturing processes on a global, regional and site-specific basis. The Group VP Procurement and his team are responsible for purchasing identified categories of major raw materials used across the Group, together with the procurement of logistics. Our largest purchasing spend is raw materials (predominantly in the form of high-quality technical grade treated minerals and chemicals) the majority of which is organised, monitored and controlled by Global Category Directors, reporting to the Group VP Procurement. Individuals within the Group Purchasing organisation are also responsible for global logistics procurement, supplier quality and development, procurement intelligence and standardisation of purchasing processes. All purchasing of goods and services not undertaken at the Group level is undertaken by the Business Units and local sites, being sourced from both global and local suppliers. Operational responsibility for integration of modern slavery into business practices is held by our purchasing professionals, at Group and business unit level.

During the past year the Legal Team has progressed the review of our standard supplier contracting terms and updated them. The changes will enable the Company to withdraw from supply relationships if modern slavery concerns are identified in the supply chain and cannot be resolved.

Under our supplier assessment programme, we engage with suppliers on their business practices to ensure quality and security of supply to Vesuvius. During 2020 we initiated a programme to introduce supplier due diligence with respect to Environment, Social and Governance issues engaging an external rating agency to support this. The initial roll out included our largest suppliers and those identified as higher risk during our Modern Slavery Risk Assessment. We continue to add sizeable and prioritised suppliers to this work over time. The supplier assessment programme continues to seek to ensure that the risk of modern slavery is managed and governed with zero-tolerance wherever we operate.

## **Risk assessment and management**

We have previously conducted a risk assessment of our purchasing activities seeking to identify, by location and industry, where we consider the potential risks of modern slavery to be the highest in our supply chain. This increased our understanding of the potential risk areas and assisted us in strengthening our oversight and procedures. Our risk assessment identified 4 industries that pose a higher risk of modern slavery for Vesuvius;

1. Mining and Extractive industries (raw materials)
2. Textiles (PPE & work clothing)
3. Transport and packaging
4. Maintenance, cleaning, agricultural work and food preparation

Our modern slavery risk assessment is reviewed regularly to update for business changes and input from across our business. As part of this review, we reconsider our assessment of the higher risk industries for Vesuvius. Our latest assessment remains consistent with the initial risk assessment performed six years ago. During this time, we have conducted several risk assessments and reviews to identify any emerging risks related to modern slavery. As a result of growing concerns over forced labour, Group Procurement has increased its focus on looking for evidence of child and forced labour.

## **Training**

A Group-wide modern slavery training programme targeting senior purchasing employees, aimed at raising awareness of the issues, was previously launched, briefing management on the different types of human rights abuses, higher risk industries for Vesuvius and providing them with information to assist them in identifying the warning signs of slavery and human trafficking. Since 2017 we have utilised an online training course to supplement this initial awareness training. Supplier facing employees are enrolled into the online training which covers our policies on human rights, industry sector risks, key warning signs, 'red flags', supplier on-boarding protocols and instructions on how to escalate concerns. In addition, our ongoing programme of compliance training, given to management globally, includes Modern Slavery risks and red flags, with management requested to disseminate this information to their teams. No modern slavery reports have been received by either Compliance through Speak Up or the HSE function during the period.

## **Reporting concerns**

We continue to encourage our employees to remain vigilant to potential modern slavery and human trafficking abuses and escalate any concerns they may have with respect to these issues. Employees can report their concerns to management or through the independent 'Speak Up' helpline, where reports are reviewed and investigated independently. We will continue to seek improvements in our knowledge and remain vigilant to potential areas of heightened risk and investigate concerns raised. Where issues are highlighted through business channels these are required to be escalated to senior management for review and resolution. As with all incident reporting, individuals who raise concerns on modern slavery in good faith will never be the target of retaliation.

## **Looking ahead**

During 2023, we aim to review, refine and assess the effectiveness of our Modern Slavery Risk Assessment through country and product specific deep-dive assessments. We will also continue engaging with an external supplier rating agency with an initial focus on those in the identified higher risk jurisdictions or categories. This review will be conducted with assistance from Group Purchasing and local purchasing teams.

The new Whistleblowing Directive (2019/1937) is due to be implemented by EU Member States by the end of 2023. Businesses operating in the EU will need to review their policies and procedures in line with Member States' requirements. The Whistleblowing Directive and relevant laws introduces the obligation for employers to establish a whistleblowing channel to enable reporting of selected violations, and to protect individuals that file such reports. During 2023, we will review these requirements and update the operation of our existing independent whistleblowing helpline to provide the channels necessary to escalate any concerns (including modern slavery, human rights, workplace safety) in line with the requirements of the Whistleblowing Directive.

### **UK entities**

This statement and the actions taken apply to Vesuvius plc and its subsidiaries, the specific UK entities that meet the reporting threshold are noted below;

- Vesuvius plc
- Vesuvius UK Limited

This statement was reviewed and approved by the Boards of Directors of Vesuvius plc and Vesuvius UK Limited on 25<sup>th</sup> July 2023 and signed on their behalf by:

**/s/ CP Forster**

**Carl-Peter Foster, Chairman  
Vesuvius plc**

**/s/ H Knowles**

**Henry Knowles, Director  
Vesuvius UK Limited**