

# VENATOR

## VENATOR MATERIALS PLC U.K. Modern Slavery Act – Slavery and Human Trafficking Statement 2021

Venator Materials PLC has prepared this Statement pursuant to Section 54 of the U.K. Modern Slavery Act 2015 (the “Act”) to describe actions that we took during 2021 to help ensure that slavery and human trafficking are not taking place in our supply chains or our business. This Statement is made on behalf of Venator Materials PLC and its consolidated subsidiaries (collectively, “Venator”). However, only selected Venator Materials PLC subsidiaries are subject to the Act.

### **Venator’s structure, its business and supply chains**

We are a global manufacturer and marketer of chemical products. We operate in two business divisions: Titanium Dioxide and Performance Additives. Our products comprise a broad range of innovative chemicals and formulations that bring color and vibrancy to buildings, protect and extend product life, and reduce energy consumption. Our administrative, research and development, and manufacturing operations are primarily located in facilities in 10 countries. As of December 31, 2021, we employed approximately 3,867 associates worldwide.

We believe that the risk of slavery and human trafficking in our own business and supply chain is low. We have robust human rights and employment policies and employ rigorous hiring procedures. Additionally, the complex and specialized nature of our business requires workers with a high degree of technical expertise and competency, making slavery and human trafficking within our organization unlikely.

### **Venator policies relating to slavery and human trafficking**

Venator has established [Business Conduct Guidelines](#) (“Guidelines”) that apply to all Venator employees (“Associates”). The Guidelines require Associates to comply with all applicable laws and regulations, including, but not limited to, those relating to slavery and human trafficking. Venator has also adopted a Human Rights Policy to further support, demonstrate and promote the protection of human rights around the world and works to ensure individual rights within our area of influence. Venator’s [Human Rights Policy](#) complements the Guidelines.

Venator also has adopted a [Vendor Code of Conduct](#) and our vendors are expected to adhere to that Vendor Code of Conduct. Specific behavioral standards are set out in the Vendor Code of Conduct, and vendors and representatives are expected to share our commitment to human rights. Vendors and representatives are expected to comply with all local wage and hour and minimum working age laws and requirements. The use of child labor by vendors and representatives is prohibited.

Under our standard form agreements with vendors, vendors are expected to represent and warrant that they do not and will not use any forced labor, whether in the form of prison labor, indentured labor or otherwise. Our standard form agreements also provide for audit rights.

### **The training available to Venator’s staff**

All Associates receive training on the Guidelines. In addition, the Guidelines and the Human Rights Policy provide that, if an Associate needs guidance on an ethical or legal question or has knowledge of a potential violation of the Guidelines, policies, procedures, or the law, he or she must seek advice from one or more of a list of resources or report it via a [24 hour hotline](#). The same channels are open to all third parties. All reports of alleged violations will be investigated. If the results of an investigation indicate that corrective action is required, Venator will decide the appropriate steps to take, including discipline, up to and including termination of employment or, in the case of a third party, the business relationship.

### **Venator’s due diligence process in its business and supply chains**

Venator has also developed a third party due diligence program in order to help ensure that our vendors and representatives comply with all applicable laws and regulations and our policies. Our program has an emphasis on areas of the world that carry higher risk. Our compliance procedures contemplate corrective action.

This Statement has been approved by the Venator Board of Directors and signed by a Venator director. A copy of the signed Statement is available upon request. Pursuant to Section 54 of the Act this Statement is also made on behalf of Venator Materials UK Limited and Venator Pigments UK Limited which are also required to make statements under the Act.