

Kgs. Lyngby, February, 2021

UK Modern Slavery Act Statement 2020

1 Introduction

This statement is published in accordance with the UK Modern Slavery Act 2015 and sets out the steps taken by Topsoe and its subsidiaries to prevent modern slavery and human trafficking in its operating business and supply chain during the financial year 2020.

2 About Topsoe's business and supply chain

Topsoe is a world-leading provider of energy-efficient technologies, catalysts, services, and hardware to produce essential chemicals and fuels. For 80 years, we have been perfecting chemistry to help the chemical and refining industries produce more, while using the least possible energy and other resources. Today, it is our vision to lead the global transition of these industries into the renewable future and reduce carbon emissions.

Topsoe is headquartered in Denmark. We employ more than 2,100 people across 15 countries and five continents. Topsoe's main production sites are in Denmark and the US. Topsoe is owned by Haldor Topsoe Holding and Temasek. For more information about Topsoe, visit [Topsoe.com](https://www.topsoe.com).

Through our supply chains, we source raw materials, technical hardware components and services from more than 600 suppliers globally. For other goods, materials and services that support our business activities, we have more than 2,500 suppliers.

3 Governance

Relevant actions are governed by Topsoe's Compliance and Sustainability Committee; a committee comprised by the CEO and other senior management representatives. The Committee oversees the implementation and development of Topsoe's Compliance program incl. Code of Conduct, its sustainability framework, and various policies, procedures designed to respond to compliance, regulatory and reputational risks as well as other stakeholder requirements.



Kgs. Lyngby, February, 2021

4 Commitment and policies

As a member of the UN Global Compact, Topsoe supports and respects the protection of all human rights as described in the Universal Declaration of Human Rights, the International Bill of Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work. At Topsoe, we are guided and sustained by the Topsoe Code of Conduct, which expresses our commitment to human and labor rights and serves as the compass for how we conduct our business in a responsible and ethical way.

To fortify our commitment to respecting human rights and thereby the elimination of modern slavery and human trafficking, we have established several policies:

- Our Supplier Code of Conduct outlines requirements toward our most essential suppliers within human and labor rights, health and safety, environmental matters and business ethics
- Our Topsoe Procurement Policy confirms that Topsoe will integrate social, environmental, and ethical responsibility in the evaluation of suppliers
- Our Conflict Mineral Policy requires that relevant suppliers adhere to the Responsible Minerals Initiative ensuring transparency related to Topsoe sourcing of conflict minerals
- Our Third Party Assurance Policy describes compliance due-diligence processes that aim to identify, evaluate and mitigate potential risks in our value chain by adequately ensuring that our relationships with third parties complies with the principles of our Code of Conduct and in compliance with applicable regulations, incl. human rights and potential unethical activities

5 Risk assessment and due diligence

The chemical industry and the business of Topsoe is generally associated with a low risk of modern slavery and human trafficking. Most of our suppliers provide highly technical products and are in countries associated with low risk of modern slavery. Certain areas of our supply chains may pose a higher labor rights risk due to their location and the nature of the goods and services procured. Specifically, for sourcing of minerals classified as 'conflict minerals', we seek to mitigate such risks through our Conflict Mineral Policy and related processes.



Kgs. Lyngby, February, 2021

To safeguard Topsoe values, we strive to select business partners who share our commitment to high ethical standards, enacted through due diligence assessments of customers, end-users and suppliers.

Our relationship with business partners, such as suppliers and intermediaries, is based on trust, dialogue and a mutual commitment to act with integrity, in line with international conventions and the principles stated in our Supplier Code of Conduct.

We conduct annual risk assessments throughout the Topsoe business to ensure that the most material risks are mapped, and corrective measures are in place. Human rights is part of these assessments.

6 Training

Topsoe's Compliance & Sustainability eLearning course, which is mandatory for all Topsoe employees, raises awareness of the principles established in our Code of Conduct. Relevant employees are trained in applicable requirements related to our business' commitment to human rights, including labor, health & safety and 'conflict minerals' requirements.

7 Access to remedy

The Topsoe Compliance Hotline provides internal and external stakeholders with the possibility to anonymously report any illegal or unethical misconduct or concerns of suspected misconduct, including human rights violations. All reports are investigated, adverse impacts are mitigated, and remediation is ensured.

This statement has been approved by Roeland Baan, Chief Executive Officer of Haldor Topsoe.

Signed:  **Roeland Baan**
CEO and President

Date: 15.02.2021

HALDOR TOPSOE 

Haldor Topsoe A/S - Haldor Topsøes Allé 1
DK-2800 Kgs. Lyngby · Denmark

