

## **SGL Carbon Fibers Ltd Slavery and Human Trafficking Statement 2020**

### **Statement from Board of Directors**

As a business, we are committed to doing everything we can to combat slavery and human trafficking. We will seek assurances from our key suppliers and business partners that they share our zero tolerance approach and we will make available the necessary training for our employees, to ensure that a clear stance against slavery and human trafficking is maintained.

*Stephen Easton*

### **Organisation Structure**

SGL Carbon Fibers Limited (“We”) are a manufacturer of oxidized PAN Fibre and Carbon Fibre, primarily serving the wind energy, aerospace and electronics sectors. We are part of SGL Carbon and our ultimate parent company is SGL Carbon SE. At the end of 2020, the Group had 4,837 employees worldwide, with 46% in Germany, 27% rest of Europe, 16% N.A. and 11% Asia. We operated a total of 29 production facilities, 16 in Europe, 8 in N.A. and 5 in Asia with a sales revenue of €919m EUR. Our business unit structure changed in 2020 and forms now 4 key groups Carbon Fibers (CF), Composite Solutions (CS), Graphite Solutions (GS) and Process Technology (PT). As a business in the UK, and as at the end of 2020, we employed 245 people across 2 locations, Halifax (x36) in England and Muir of Ord (209) in Scotland. We have an annual turnover of around £60 Million.

### **Our Supply Chains**

We had 486 active suppliers to our UK business during 2020. The top 15 of these suppliers account for 86% of our spend by value. These top 15 suppliers are either based in the UK or in other low-risk countries, and none of them are in industries regarded as high risk (eg. hospitality, agriculture, mining). All of our suppliers are subject to an internal review process before they are accepted as a supplier and, in many cases, they also hold quality accreditations which are subject to audit by the certification bodies.

### **Our Policy on Slavery and Human Trafficking**

We are committed to ensuring that slavery or human trafficking play no part in our supply chain or our business.

## **Due Diligence Process relating to Slavery and Human Trafficking**

With support from our Central Group Purchasing function, we have introduced a Supplier Code of Conduct, to which all key suppliers are required to sign up. In 2020, 99% of our procurement spend by value was with suppliers who have signed up to this Code of Conduct. The Code of Conduct, amongst other things, requires them to confirm they comply with all applicable Human Rights legislation, in particular regarding Human trafficking, slavery and child labour. We also operate a policy which affords protection to whistleblowers.

## **Training**

Our procurement team, along with our senior leadership team, have received training on the SGL Supplier Code of Conduct, and will continue to receive such training as is appropriate to allow the risks of slavery and human trafficking to be identified and mitigated.

## **Effectiveness of Policy**

We will periodically review our Supplier Code of Conduct and the effectiveness of our training, to ensure that both continue to provide a robust and cost-effective approach for delivering our stated policy of zero-tolerance on slavery and human trafficking.

This statement constitutes SGL Carbon Fibers Limited's Slavery and Human Trafficking statement under the Modern Slavery Act 2015, for the financial year ended 31<sup>st</sup> December 2020.

*Stephen Easton*  
*Site Director*  
*SGL Carbon Fibers Ltd*

*16<sup>th</sup> April 2021*