

SGL Carbon Fibers Ltd Slavery and Human Trafficking Statement 2021

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 2021, the Group had 4,680 employees worldwide, 83% men and 17% woman. 45% in Germany, 28% rest of Europe, 16% N.A. and 11% Asia. The headcount is across x31 locations with a total of 29 production facilities, 16 in Europe, 8 in N.A. and 5 in Asia with a sales revenue of €1,007m 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 2021, we employed 276 people across 2 locations, Halifax (x33) in England and Muir of Ord (243) in Scotland. We have an annual turnover of around £65 Million.

Our Supply Chains

We had 423 active suppliers to our UK business during 2021. The top 15 of these suppliers account for 83% 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

In the future, all active suppliers will also undergo an online sustainability assessment, with roll-out to be phased in 2022. The online assessment will include standard sustainability components such as Ethics and Compliance (Environmental Protection; Human Rights; Supply Chain Responsibility; Health & Safety; Anti-Bribery & Corruption and Cyber Security). The results of the online questionnaire, along with information from public sources, are incorporated into the risk assessment of each supplier, with the aim of mitigating or eliminating the risks identified. Group Compliance comprehensively trained the Global Purchasing Team on “Due Diligence in the Supply Chain” in November 2021.

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 31st December 2021.

Stephen Easton
Site Director
SGL Carbon Fibers Ltd

5th May 2022