



Flint Group Anti-Slavery & Human Trafficking Statement 2019

Flint Group is fully committed to ethical business practices and this commitment is overseen and guided by the Flint Group Risk & Compliance Committee together with the company's Chief Compliance Officer.

Through our Code of Conduct we set out the values and standards expected of all our employees and all those who work for or on behalf of Flint Group. We are particularly committed to the principles of the UN Global Compact including those concerning modern slavery and human trafficking. This is a key priority across our business and, in so far as is practical, our supply chain.

We take steps to minimize the possibility of Flint Group becoming involved in compliance violations, including but not restricted to modern slavery & human trafficking, by ensuring we have effective policies, processes and procedures in place. In particular, the Flint Group Code of Conduct is supported by several supplementary policies and minimum control standards.

Additionally, through extensive training in 20 languages we communicate with employees and 3rd party partners the importance of all aspects of the Flint Group Code of Conduct including compliance with local employment laws, respect for human rights and a zero tolerance for any form of forced labour.

Through our company hotline and our annual Employee Representation Certificate (ERC), we seek feedback from employees on potential violations of the Flint Group Code of Conduct. All employees can raise concerns about practices within our business or supply chain without fear of reprisals and our ERC certification includes a specific declaration regarding modern slavery.

For our 3rd party partners, such as joint venture companies, sales agents & distributors, we undertake background checks and require a contractual commitment to abide by all applicable laws, regulations and the Flint Group Code of Conduct.

We are particularly careful to ensure that our recruitment and retention of employees is based on free and fair practices. Hence, Flint Group does not charge any worker placement, service or resident fees of any kind and we do not allow employee loans. We check the identity and legal right to work of all employees and clearly communicate employment rights and obligations. All workers are free to resign in line with their notice period and where agency workers are employed we use only reputable agencies.

Within our supply chain we play a proactive role in raising the awareness of business ethics, including modern slavery. All major first line suppliers are asked to sign up to the Flint Group Code of Conduct. Within our procurement contracts and our general terms and conditions of purchase we emphasise the importance of high ethical standards including the condemnation of forced and child labour and will cease trading with suppliers that do not share our values.

A handwritten signature in black ink, appearing to read "Jeremy Berenzweig".

Jeremy Berenzweig

General Counsel & Chief Compliance Officer

Notes:

1. This statement is made pursuant to S.54 of the UK Modern Slavery Act 2015 and sets out the steps taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.
2. Flint Group's financial year end is 31 December
3. This statement was approved by the Flint Group Executive Management Team on 22 Nov 2018