# Modern Slavery and Human Trafficking Statement For Financial Year Ending December 31, 2020

The scope of this statement covers all our operations worldwide, including those of our subsidiaries.

#### **About Sulzer**

Sulzer is a global leader in fluid engineering. We specialize in pumping, agitation, mixing, separation and application technologies for fluids of all types. Our global operations fall within four divisions:

**Pumps Equipment:** leading provider of pumping solutions specifically engineered for the processes of our customers. We provide pumps, agitators, compressors, grinders and screens developed through intensive research and development in fluid dynamics and advanced materials.

**Rotating Equipment Services:** through a network of over 100 service sites around the world, Sulzer provides cutting-edge parts, maintenance and repair solutions for pumps, turbines, compressors, motors and generators.

**Chemtech:** global market leader in innovative mass transfer, static mixing and polymer solutions for petrochemicals, refining, LNG, bio-polymers and biofuels.

**Applicator Systems:** develops and delivers innovative fluid applicators for the dental, adhesives, healthcare and beauty markets.

More: About Sulzer

## Our principles and policies

Sulzer is committed to the elimination of modern slavery and human trafficking from the supply chain. Sulzer's Procurement function directs our activities and our relationships with suppliers in accordance with many internal and external ethical guidelines. These guidelines and policies serve as a point of reference for upholding fundamental human rights as well as working conditions, occupational health and safety, business ethics, and environmental law. The policies are reviewed regularly to ensure they remain relevant and fit for purpose in a market leading global company. They include:

- Code of Business Conduct (CoBC): This code explains the manner in which we behave
  as an organization and how we expect our employees to act. It includes a commitment to
  comply with all employment and labour laws, including those related to the elimination of
  all forms of forced and compulsory labour (including child labour). We require all
  employees to sign the CoBC.
- Recruitment Policy: We operate a robust employment policy, including conducting eligibility to work in a particular location and checks for all employees and contractor provided personnel to safeguard against human trafficking or individuals being forced to work against their will in high risk areas.
- Whistleblowing Policy: We operate an independently provided whistleblowing procedure where all employees know and are made aware that they can raise concerns without fear

- of reprisals about the treatment of colleagues or of practices within our business or supply chain.
- UN Global Compact: We are a longstanding signatory to the United Nations Global Compact and support its drive for human rights and social dimension of corporate responsibility.

# Our supply chain

Our supply chain procedures include a Global Supplier Qualification Process (GSQP) for potential and existing suppliers. GSQP allows the systematic identification, selection, auditing, verification, and development of global suppliers based on quality and sustainable supply chain practices and performance. Our procurement management carefully select and evaluate suppliers' processes and products, this may include, particularly where a higher risk is identified, on-site visits and audit by internal sourcing personnel. In case of non-compliance, either the supplier is not qualified, or a corrective action plan is implemented before the partnership is continued. Our procedures examine procurement spend in countries identified as having high risk, allowing us to efficiently focus our due diligence and examinations.

While our supply chains are global, the majority of our supplier relationships are long-term and stable, allowing Sulzer to consistently communicate our expectations and influence performance and good practices.

#### **Compliance and Training**

Every legal entity within Sulzer has an appointed Compliance Officer who is responsible for ensuring that the Code of Conduct is adhered to and can also give advice and direction to local employees on ensuring that our policies and principles are appropriately implemented. In addition, we require our employees (including our procurement teams) to undertake regular compliance training on a variety of important compliance topics including how to spot and raise any issues (including Modern Slavery) both internally and within our supply chain. Whilst the incidence of classroom training has reduced in 2020, we are pleased to say that much of our compliance training is internet based and has been able to continue regardless. We have also used virtual training across various electronic mediums to supplement this.

During 2020, a targeted Modern Slavery and Human Trafficking e-learning module was delivered to 280 Sulzer employees to raise awareness of the issues and the signs of slavery and human trafficking. We believe this training is essential to further reduce the risk in our supply chain and we will look to repeat and expand such trainings in the future.

We also provide compliance training to suppliers who attend our regional supplier conferences.

### **Continued improvement**

We believe that our current systems and procedures are robust in identifying any evidence of modern slavery or human trafficking within our organization, and that this risk remains low. Nevertheless, we recognize the need to further improve and enhance our tools and procedures on this complex subject.

Having completed an initial risk assessment within the UK businesses when the UK Modern Slavery Act 2015 came into force, it will be timely to repeat the risk assessment during 2021 to ensure the areas of focus for continued improvement remain the correct ones.

During the financial year ending 31 December 2020, there were no reports or findings of the presence of modern slavery or human trafficking in our supply chain.

The Board of Directors of Sulzer AG has approved this statement for the financial year ending on December 31, 2020.

Gregoire Poux-Guillaume

Chief Executive Officer

For and on behalf of Sulzer AG

30 March 2021