California Transparency in Supply Chains Act and
Modern Slavery Act Transparency Statement
2023 Annual Disclosure

This statement has been published in accordance with the California Transparency in Supply Chains Act and the Modern Slavery Act 2015. It sets out the steps taken by SHI International Corp. and its affiliates, including SHI Corporation UK Ltd. (hereinafter SHI), during the year ending 31 December 2022 to prevent modern slavery in SHI’s business and supply chains.

SHI will continue to act ethically and with integrity in its business relationships. SHI has implemented appropriate measures and controls to ensure that slavery and human trafficking is not taking place in SHI’s supply chains.

SHI maintains a zero-tolerance approach to any violation of fundamental human rights, including slavery, servitude, forced, compulsory labor, and human trafficking. SHI purchases products for resale to customers either directly from suppliers or from distributors who are equally committed to ensuring the absence of slavery and human trafficking in their supply chains.

SHI expects its suppliers to conduct their businesses in compliance with all applicable laws. SHI relies on its suppliers to monitor their supply chains. While SHI has not required written certifications from all suppliers confirming their compliance with slavery and human trafficking laws, SHI retains the right to discontinue transacting business with any supplier that does not comply with such laws.

SHI maintains internal standards of accountability and has implemented procedures applicable to employees and contractors who fail to satisfy such standards that can result in discipline up to and including termination. SHI also operates a Whistleblower policy, which encourages its employees to immediately report any suspected wrongdoing or dangers in relation to SHI’s business activities. SHI also provides ongoing training for its employees with respect to SHI’s ethical business practice requirements.

As part of SHI’s due diligence processes, the following control measures have been implemented to identify and mitigate potential risk:

- Identify and assess potential risks (via risk assessments) in SHI’s business and supply chains
- Engage with SHI’s suppliers to gain an understanding of the measures they have taken to ensure that modern slavery is not occurring in their businesses
- Where appropriate, seek to introduce supplier pre-screening and self-reporting with respect to safeguarding controls
- Introduce contractual provisions, including audit(s) for suppliers to confirm their adherence to the policy
- Protect whistleblowers

SHI will not support or have any business dealings with any third party, manufacturer or vendor knowingly involved in slavery or human trafficking. To ensure all those in SHI’s supply chain comply with its ethics, SHI’s dedicated compliance team, consisting of representatives from Legal, Human Resources and Operations, assume responsibility for implementing this policy statement and its objectives as well as providing comprehensive training to SHI’s staff.

This statement is made pursuant to the California Transparency in Supply Chains Act and the Modern Slavery Act 2015 and constitutes SHI’s slavery and human trafficking statement for the year ending 31 December 2022. This statement has been approved by the SHI Executive Leadership team and is publicly available at www.shi.com and www.uk.shi.com.

Signed for and on behalf of SHI International Corp. and its affiliates, including SHI Corporation UK Ltd.

Kevin C. McCann
General Counsel
SHI International Corp. and its affiliates