

**The Modern Slavery Act Disclosure Statement for 2018**  
**of**  
**The Lubrizol Corporation**

**Our Company**

The Lubrizol Corporation (“Lubrizol”), established in 1928 in Wickliffe, Ohio, is a market-driven global company. Lubrizol reaches its customers through 2 business segments. The Lubrizol Additives segment supplies additives for engine oils, driveline applications, gasoline and diesel fuel, other transportation-related fluids, and industrial lubricants and fluids. The Lubrizol Advanced Materials segment supplies advanced specialty polymers, polymer-based additives and chemical additives used in everyday consumer and industrial applications. We develop complex specialty chemicals to optimize the quality, performance and value of our customers' products while reducing their environmental impact. Lubrizol has a global footprint with approximately 34 lab/technical facilities, 60 manufacturing sites and 47 sales offices in Americas, Europe, Middle East & Africa; Asia Pacific. More information may be found at <https://www.lubrizol.com>.

**Our policies**

Lubrizol is committed to honesty and integrity in all aspects of its operations. Lubrizol’s explicit commitment to human rights and to opposing human trafficking is reflected in its Code of Ethics and Supplier Code of Conduct, both of which are explained below.

Lubrizol’s Code of Ethics was adopted in 2017. The Code of Ethics updated and replaced the Ethical and Legal Conduct Guidelines, which had been in place for many years and which covered the same topics. The Code of Ethics is translated into 11 languages; all Lubrizol employees, and all business partners (when doing business with Lubrizol) are required to comply with the Code of Ethics. The Code of Ethics can be found at <https://www.lubrizol.com/-/media/Careers/Career-Packets/Code-of-Ethics---English-2017.pdf>.

On the subject of slavery and human trafficking, the Code of Ethics states:

*“Lubrizol supports fundamental human rights for all people and only employs individuals who apply to work willingly and are legally of age to perform the work. Lubrizol does not tolerate child labor, human trafficking, slavery or other forced labor at its facilities.”*

*“Lubrizol is committed to ensuring that its supply chain reflects Lubrizol’s values and respect for human rights. Lubrizol informs its suppliers that they must have a work environment that is free from illegal discrimination and from child labor, human trafficking, slavery or other forced labor. Lubrizol does not tolerate a supplier that fails to meet these requirements.”*

Lubrizol also has a Supplier Code of Conduct, which was adopted in 2018 to ensure that our supply chain understands our expectations with respect to ethical and legal conduct, including human rights. Upon adoption, the Supplier Code of Conduct was distributed to over 4000

suppliers globally. Suppliers are informed that a violation of the Code of Conduct, including a failure to promptly remedy or report a violation, will mean that they will lose their business with Lubrizol. The Supplier Code of Conduct can be found at <https://www.lubrizol.com/-/media/Lubrizol/Our-Company/Documents/Ethics/Lubrizol-Supplier-Code-of-Conduct.pdf>.

On the subject of slavery and human trafficking, the Supplier Code of Conduct states:

*“Suppliers must provide a workplace that is free from all forms of human trafficking, forced labor and child labor in their operations. Suppliers must ensure that workers’ contracts clearly convey the conditions of employment in a language understood by the workers.”*

### **Due diligence processes, risk assessment and management**

To ensure that its commitment to human rights is reflected in actual practices, Lubrizol has adopted the following processes for the implementation of its policies:

Under the Code of Ethics, it is the responsibility of each employee to speak up as soon as there is an ethics-related question or concern. Reports can be made to the corporate ethics office, a local ethics leader, a supervisor or through the ethics hotline reporting system. Lubrizol has approximately 40 local ethics leaders around the world, including in the United Kingdom. Violations are subject to disciplinary action, up to and including termination of employment. Retaliation against anyone who has reported a concern in good faith is considered a violation of the Code of Ethics and is not tolerated.

Business partners such as distributors, sales representatives and consultants are required to follow the Code of Ethics when they are representing Lubrizol. In order to ensure that Lubrizol is only engaging business partners that share its commitment to ethical and legal business practices, business partners are required to complete a risk-based onboarding process before they may begin representing Lubrizol. The process includes a questionnaire, due diligence and training. There also are periodic re-certifications during the life of the relationship.

Suppliers receive the Supplier Code of Conduct on an annual basis and are subject to a periodic certification process. If at any time Lubrizol determines that there is need to conduct an audit to confirm a supplier’s compliance with the Code of Conduct, full and timely cooperation by the supplier is required.

### **Effective action**

Since the adoption of the law, there have been no reports of any violations of the U.K. Modern Slavery Act. Lubrizol is committed to taking prompt and decisive action should a concern be reported in the future.

## **Training and awareness on slavery and trafficking**

Training and raising awareness remain a key focus for Lubrizol.

- Lubrizol's supply chain organization receives training regarding slavery around the world and Lubrizol's commitment to transparency in its supply chain. Lubrizol intends to remain vigilant in this area and will seek audits of its suppliers where warranted.
- Every employee is required to complete training on the Code of Ethics. For new employees, the training must be completed upon commencement of employment. For existing employees, the training is once every 2 years.
- Business partners are required to complete an ethics and compliance training program upon commencement of the engagement, and periodically thereafter, pursuant to a certification process.
- Lubrizol's suppliers receive the Supplier Code of Conduct on an annual basis, reminding them of Lubrizol's expectations. Lubrizol obtains verification from suppliers that they are committed to respecting human rights and to complying with the Code of Conduct, through signed contracts or through the Supplier Code of Conduct certification process.

## **Continuous improvement**

A strong dedication to operating ethically and responsibly has always been essential to who we are as a corporation and serves as a strong foundation for how we create value for our stakeholders. We strive for continuous improvement in our governance, ethics and compliance programs, including our policies regarding human rights.

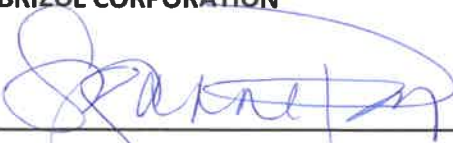
This statement is made in accordance with the Modern Slavery Act 2015, for year 2018 and applies to Lubrizol and its subsidiaries, including, but not limited to, the United Kingdom subsidiaries listed on Annex A attached hereto.

This statement is signed under the authority granted to the undersigned by the Board of Directors of Lubrizol.

**November 11, 2019**

**THE LUBRIZOL CORPORATION**

**By:**



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**Suzanne F. Day**  
**Senior Vice President and Chief Legal and Ethics Officer**

## **ANNEX A**

### **Subsidiaries of The Lubrizol Corporation in the United Kingdom**

<b><u>Company Name</u></b>	<b><u>Company Number</u></b>
Chemtool (UK) Limited	05643249
Diamond Digital Holdings Limited	06850896
Diamond Dispersions Ltd.	06345439
Lubrizol Adibis (UK) Limited	03529718
Lubrizol Adibis Holdings (UK) Limited	00530121
Lubrizol Group, LLP	OC402577
Lubrizol Limited	00775276
Warwick Equest Limited	03461709
Warwick International Group Limited	02982784
Warwick International Holdings EBT Limited	06887289
Warwick International Holdings Limited	06592528
Warwick International Intermediate Holdings Limited	06593528
Warwick International Limited	02386927