

The Modern Slavery Act Disclosure Statement for 2024

of

The Lubrizol Corporation

Our Company

Established almost 100 years ago, in 1928, The Lubrizol Corporation (“Lubrizol”) is a leading specialty chemical company that delivers sustainable solutions to advance mobility, improve well-being and enhance modern life. A Berkshire Hathaway company, Lubrizol has a global footprint with technical facilities, manufacturing sites, and sales offices in countries around the world.

Lubrizol has a centralized procurement organization, which is accountable for supplier assessment and selection, contract negotiation and relationship maintenance. Procurement establishes approved buy-channels for the purchase of goods and services, which all Lubrizol personnel are required to use. These policies are designed to ensure that only qualified suppliers that meet Lubrizol’s requirements are engaged.

More information about Lubrizol may be found at <https://www.lubrizol.com>.

Our Commitments / Policies

Lubrizol is committed to ethical and legal conduct in all aspects of its operations, including a commitment to human rights. The company’s opposition to human trafficking in all its forms is reflected in its Code of Ethics and Supplier Code of Conduct, both of which are available at [Ethics at Lubrizol](#).

Lubrizol’s Code of Ethics is explicit regarding human rights:

Lubrizol believes that every person is entitled to fundamental human rights including the right to work willingly, to move freely and to receive fair wages. Lubrizol prohibits all forms of human trafficking, forced labor and child labor at its facilities and has adopted policies and practices to ensure employees are compensated competitively and in compliance with applicable laws.

In this regard, Lubrizol has committed to:

- *Only employ individuals who willingly seek employment;*
- *Not hire any person under 15 years of age; and*
- *Forbid human trafficking, slavery or servitude of any kind within our operations.*

The Code of Ethics also requires transparency in Lubrizol’s supply chain:

Lubrizol strives to ensure that its supply chain reflects its respect for the lives of all people and support for human rights. To that end, Lubrizol has adopted a Supplier Code of Conduct, which can be found on www.lubrizol.com.

All Lubrizol employees and business partners are required to comply with the Code of Ethics as to their work for Lubrizol. Accordingly, they receive training on the requirements of the Code, which has been translated into 13 languages.

Lubrizol's Supplier Code of Conduct was adopted in 2018 and updated in 2023. Like the Code of Ethics, it has been translated into multiple languages. As explained more fully below, suppliers receive the Supplier Code of Conduct annually and are required to follow it. The Supplier Code of Conduct is also incorporated into Lubrizol's purchase orders.

Regarding child or forced labor, the Supplier Code of Conduct states:

You will reject and actively combat all forms of child and forced labor. Do not directly or indirectly use child labor of any kind or forced labor (including, but not limited to, debt bondage, modern slavery, withholding of documents) or materials or services produced using such labor.

Regarding human trafficking, the Supplier Code of Conduct states:

You will prohibit any form of human trafficking, including, but not limited to, use of force, fraud or coercion to obtain labor services, procuring commercial sex acts, destroying or concealing a person's identity, using misleading or fraudulent practices to recruit employees, charging recruitment fees or failing to provide return transportation to employees recruited from foreign countries. Do not procure materials or services that use such practices.

Due diligence processes, risk assessment and management

Lubrizol has adopted the following processes for the implementation of its policies and commitment as to human rights:

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 45 local ethics leaders around the world, including in the United Kingdom. Personnel found to have violated the Code of Ethics are subject to disciplinary action, up to and including termination of employment. Retaliation against anyone who has reported a concern in good faith, or who assisted in an ethics investigation, is strictly prohibited and is considered a violation of the Code of Ethics.

Business partners, such as distributors, sales representatives and consultants, are required to follow the Code of Ethics when they are representing Lubrizol. 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 required to comply with it in the work that they do for Lubrizol. Key suppliers, accounting for eighty (80) percent of Lubrizol's global expenditures, must complete a certification acknowledging receipt of the Supplier Code of Conduct. If at any time Lubrizol determines that there is need to conduct an audit to confirm a supplier's compliance with the Supplier Code of Conduct, full and timely

cooperation by the supplier is required. A supplier’s failure to follow the Supplier Code of Conduct may result in termination of the engagement, or other corrective action.

Training and awareness on slavery and trafficking

Training and raising awareness remain key priorities for Lubrizol.

- Every Lubrizol 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 per year.
- 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 supply chain organization receives training regarding slavery around the world and Lubrizol’s commitment to transparency in its supply chain. Lubrizol will remain vigilant in this area and will seek audits of its suppliers as warranted.
- Lubrizol’s suppliers also receive a copy of the Supplier Code of Conduct on an annual basis. The Supplier Code of Conduct outlines the principles that Lubrizol requires its suppliers to follow in their work for Lubrizol and to implement through their supply chains. As explained above, acknowledgements are required from key suppliers.

Continuous improvement

At Lubrizol, an unwavering 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 2024 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.

Dated: _____

THE LUBRIZOL CORPORATION

By: _____
Jose Gonzalez-Magaz
Senior Vice President and Chief Legal and Ethics Officer

ANNEX A

Subsidiaries of The Lubrizol Corporation in the United Kingdom

<u>Company Name</u>	<u>Company Number</u>
Chemtool (UK) Limited	05643249
Lubrizol Adibis Holdings (UK) Limited	00530121
Lubrizol Limited	00775276
Lubrizol Management UK Limited	14460570
Warwick International Group Limited	02982784
Warwick International Intermediate Holdings Limited	06593528