



Novolex Statement

on

Human Trafficking and Anti-Slavery

in accordance with the

U.K. Modern Slavery Act

&

California Transparency in Supply Chains Act

Novolex™ Holdings, LLC, 101 East Carolina Avenue, Hartsville, South Carolina 29550

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Novolex Statement Regarding Human Trafficking and Anti-Slavery in accordance with the UK Modern Slavery Act and California Transparency in Supply Chains Act

Effective June 2020

Novolex® is committed to conducting business in an ethical manner and supports the goals of the California Transparency in Supply Chains Act of 2010 and the UK Modern Slavery Act of 2015. We respect human rights and will support organizations working to address this challenging issue. Novolex has zero tolerance for child and illegal, abusive and forced labor and human trafficking anywhere in our operations.

The Company's history of promoting ethical business practices is reflected in our Sustainability Report, Supplier Code of Conduct (the "Code") and Employee Code of Conduct and Business Ethics. Employees are trained on the Employee Code of Conduct, which includes provisions pertaining to respect for human rights provisions, when they join the company and attest that they understand those provisions. In line with our principles, the Company follows all applicable employment laws and pay competitive wages and benefits.

We recognize our responsibility to promote human rights in our supply chain and are committed to being part of the solution to address inequality with our supply members. To help implement our commitment to human rights and ethical business practices within our supply chain, our standard contractual Terms and Conditions include an obligation that suppliers support our commitment and abide by the provisions of the Code. As part of that commitment and as outlined in the Code, we also require our suppliers to abide by international best practices relating to working hours, child labor and forced labor, among other regulations designed to support human rights. A copy of the Supplier Code of Conduct can be found on our website at www.novolex.com.

In addition to contractual obligations, to assess supplier compliance Novolex utilizes an annual verification process with our 150 largest suppliers to ensure that they comply with the company's expectations, including compliance with all applicable laws and the promotion of corrective actions. Novolex applies a risk management based process to assess compliance with the Code. If we suspect human rights abuses or have reason to believe suppliers are not adhering to Code requirements, we take action until we are confident concerns related to human rights have been addressed. We reserve the right to conduct third-party audits on suppliers to verify compliance with Novolex standards and either promote corrective actions or terminate a supplier's contract, as necessary.

Third parties representing Novolex, including but not limited to distributors, consultants, agents and representatives, partners and vendors, are also to comply with relevant aspects of our compliance policies pertaining to anti-corruption and fair competition included in the Code. Employees working with third parties must include contractual obligations to comply, provide education and information about policy requirements and take action including terminating a relationship after learning that a third party failed to abide by applicable Company policies.

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Novolex has an internal accountability process where employees, customers, suppliers, and vendors are free, and without fear of retribution, to express any concerns related to the above-mentioned codes through an ethics helpline listed on our Company website. The process requires that if an employee knows or suspects that a supplier or another part of Novolex operations is involved with forced labor, it must be immediately reported to the General Counsel or the Compliance Committee. Novolex commits to promptly and thoroughly investigate any claims or indications reported to it that a supplier is engaged in human trafficking or slave labor or is otherwise in violation of our business agreements.

A handwritten signature in black ink, appearing to read "Stanley Bikulege". The signature is written in a cursive, flowing style.

Stanley Bikulege
Chairman and CEO