

Transparency

The California Transparency in Supply Chains Act of 2010 was enacted on January 1, 2012, and the United Kingdom Modern Slavery Act 2015 was enacted on March 26, 2015. These laws are designed to increase the amount of information made available by manufacturers and retailers regarding their efforts to address the issue of slavery and human trafficking.

Innophos Holdings, Inc.

Innophos Holdings, Inc. (together with its subsidiaries, “Innophos”) is a leading international producer of specialty ingredient solutions for the food, health, nutrition, and industrial markets. Innophos is headquartered in Cranbury, New Jersey, USA, and has sales and manufacturing facilities across the globe.

Respect for people is one of our core values. Innophos is committed to combatting slavery and human trafficking in our own business and supply chain. Specifically:

Innophos is opposed to slavery, human trafficking, or forced labor in any form, and it is strictly prohibited throughout our organization.

Our code of ethics and other corporate policies forbid any such acts and also require adherence to all applicable federal, state, local, and international laws, which include laws prohibiting human trafficking and forced labor including those mentioned above.

Innophos will not tolerate the use of child or forced labor in any of its global operations and facilities. We will not tolerate the exploitation of children, their engagement in unacceptably hazardous work, and the physical punishment, abuse, or involuntary servitude of any worker.

Innophos’ Supply Chains

Pursuant to its standard terms and conditions of purchase and other contractual agreements, Innophos requires its suppliers to comply with all applicable laws, including all laws regarding slavery, human trafficking, and forced labor.

Innophos presently does not engage in specific independent third party verification of its supply chain regarding risks of human trafficking and slavery, but does conduct periodic audits of certain raw material suppliers for compliance issues.

Although Innophos does not have a specific supplier certification for human trafficking and forced labor, Innophos will not approve any supplier that engages in human trafficking or forced labor prohibited under federal, state, local, and international laws. We expect our suppliers and contractors with whom we do business to uphold the same standards as Innophos. Should a violation of Innophos standards become known to Innophos and not be corrected, Innophos shall discontinue the business relationship.

Innophos Employees

The principles of human rights are woven throughout our employee Code of Conduct. All employees of Innophos and its subsidiaries, including those with direct responsibility for supply chain management, are expected to know and abide by this Code. Rigorous training on the content and application of the Code is mandatory for each and every employee, and each employee must periodically acknowledge that they have read and agree to comply with the Code. Innophos employees who witness a potential legal violation or violation of Innophos policies and procedures are directed to notify their supervisor, any officer of the company, any Innophos Human Resource employee, or any in-house counsel of the company. Innophos takes seriously and fully investigates all potential legal or Code violations in a respectful, confidential, and fair manner, and takes action consistent with the severity of the violation, including termination of employment or contract.

Effective Date: March 2019