



## Modern Slavery Statement

**Policy Number:** IS11

**Policy Owner:** UK Business team

**Effective Date:** September 7, 2023

**Policy Contact(s):** Quality & Compliance Officer

**Date of Last Review:** September 7, 2023

### Purpose

The purpose of this Modern Slavery Statement (this "Statement") is to report on the actions of the Compass Minerals UK and DeepStore businesses (together, with the applicable business entities and affiliates, the "Company" or "we") to identify, assess risk and take mitigating steps to prevent the occurrence of modern slavery, human trafficking and other human rights abuses in its business and supply chains.

### Scope

This Statement applies to the Company's UK operations and all employees, officers and directors working for or on behalf of the Company's UK operations.

### Policy Statement

#### 1. INTRODUCTION

- 1.1 The Company promotes and supports human rights consistent with our Core Values and are guided by the UK Human Rights Act 1998, the UK Modern Slavery Act 2015 and the United Nations Guiding Principles on Business and Human Rights.
- 1.2 The Company and its affiliates, including its ultimate parent company, Compass Minerals International, Inc. (together, with its subsidiaries, "Compass Minerals") have zero-tolerance for modern slavery and child labour, all forms of forced or compulsory labour, discrimination and harassment.

#### 2. APPLICABLE LAW AND REVIEW CADENCE

- 2.1 This is the Company's first Modern Slavery Statement, issued under section 54 of the UK Modern Slavery Act 2015.
- 2.2 The Modern Slavery Statement will be updated and published annually. The current Statement gives an overview of actions taken between 2022 and 2023.

### **3. STATEMENT**

#### **3.1 The Business Structure and Supply Chain**

- 3.1.1 Compass Minerals is a leading global provider of essential minerals focused on safely delivering where and when it matters to help solve nature's challenges for customers and communities. By responsibly transforming Earth's natural resources, we help keep people safe, feed the world and enrich lives.
- 3.1.2 Compass Minerals operates locations in North America and the UK. The ultimate parent entity of our business, including the UK business, is Compass Minerals International, Inc., a publicly listed company on a United States national stock exchange. The UK business is comprised of two segments. One segment produces salt products that keep roadways safe during winter weather (mined from the Winsford Mine, the largest dedicated rock salt mine in the UK). The other segment, the DeepStore business, provides records management services and operates out of excavated areas of the Winsford Mine, as well as a satellite location in the London Metropolitan area.
- 3.1.3 The Company's (Compass Minerals UK and DeepStore) suppliers and contractors are based in the UK.

#### **3.2 Policies in relation to slavery and human trafficking**

- 3.2.1 The Company promotes and supports human rights consistent with our Core Values and is guided by the Universal Declaration of Human Rights, the United Nations Global Compact and the Guiding Principles on Business and Human Rights. We make sure our policies, governance and due diligence processes take into account human rights risks so that we properly manage and mitigate them.
- 3.2.2 Integrating and promoting respect for human rights throughout our operations and our supply chains is a priority for our business.
- 3.2.3 All employees undertake training regarding our Core Values, [Code of Ethics and Business Conduct](#), anti-discrimination and anti-harassment.
- 3.2.4 Please see Compass Minerals' [Human Rights Policy](#) and [latest ESG report](#) for more information on the foundational steps we take to ensure human rights are respected when we do business.
- 3.2.5 Our supplier requirements are explained in our [Supplier Code of Conduct](#).

#### **3.3 Due Diligence Processes**

- 3.3.1 We aim to build relationships with our suppliers to ensure they comply with our values and that they are aware of our commitment to protect human rights.
- 3.3.2 We enforce our Standards of Business Conduct and Supplier Code of Conduct through supplier contracts, supplier assessments and audits and corrective action.
- 3.3.3 Together, these components comprise a comprehensive due diligence process that identifies, monitors, and mitigates the risk of modern slavery and human trafficking in our supply chains.

### **3.4 Risk Assessment and Management**

- 3.4.1 There are no particular areas of the business that could give rise to highest modern slavery risks.
- 3.4.2 If we suspect a case of Modern Slavery in our supply chains we will inform our internal Legal department while reviewing the issue(s) with the supplier.
- 3.4.3 We will also investigate the termination of business relationships or contracts with suppliers that fail to improve their performance in line with an action plan or where our agreed terms of trading have been breached.
- 3.4.4 We review our Supplier Code of Conduct at appropriate intervals to ensure that it is appropriate and relevant and contains clear obligations for our suppliers regarding the prevention of Modern Slavery.

### **3.5 Key Performance Indicators**

- 3.5.1 If potential modern slavery risks are identified within a contract requirement, we will work with our suppliers to develop appropriate key performance indicators to monitor and manage performance in regards to these risks.
- 3.5.2 By 2024, the Company shall be in a position to report on the following key performance indicators (KPIs):
- 3.5.3 Performance of due diligence on our suppliers. We shall review the responses of our suppliers via any Third Party Supplier Evaluation forms received and report the percentage of non-satisfactory responses. Any unsatisfactory responses shall be followed up and investigated further.

### **3.6 Training on modern slavery and trafficking**

- 3.6.1 We recognise the importance of ensuring all of our staff understand how to combat slavery and human trafficking.
- 3.6.2 All employees are bound, by virtue of their terms of employment, by our policies and codes of conduct.
- 3.6.3 Modern slavery and trafficking communication is covered through the Employee Handbook.

## **4. RESPONSIBILITIES**

- 4.1 The Company has a responsibility to ensure slavery is not taking place in its operations and supply chain.
- 4.2 The Company is committed to acting ethically and with integrity in all of our business dealings and relationships and to implementing and enforcing effective systems and controls to reasonably ensure that slavery is not taking place anywhere in our own business or in any of our supply chains.

4.3 All Company employees have a duty to abide by all Company policies and procedures and report any concerns in a timely and effective manner.

**This Statement has been approved by Gordon Dunn,  
Managing Director UK  
7 September 2023**

A handwritten signature in black ink, appearing to be 'Gordon Dunn', written over a horizontal line.

**Signature**