

## **UK Modern Slavery Act 2015**

*This statement is made in accordance with Section 54 of the UK Modern Slavery Act of 2015 and other applicable laws.*

PQ Corporation (together with its subsidiaries, the “Company”) is committed to conducting business in an ethical manner that respects human rights. It is the Company’s policy that the Company and its vendors, suppliers, contractors, consultants, agents and other providers of goods and services (our “Suppliers”) must comply with all applicable laws and not utilize any form of forced labor, human trafficking or slavery, and any allegations of violations of this policy will be thoroughly investigated and, if appropriate, corrective actions will be taken.

The UK Modern Slavery Act of 2015 requires commercial organizations carrying out business in the UK with an annual turnover of at least £36 million to publish a modern slavery statement. The information outlined below contains the Company’s disclosure of its efforts to eliminate slavery and human trafficking from its direct supply chain during the financial year 2018, as required by the UK Modern Slavery Act of 2015:

### **1. Organization.**

The Company is a subsidiary of PQ Group Holdings Inc. (NYSE: PQG), an integrated global provider of catalysts, refining services, performance chemicals and performance materials. Our catalysts business is a leading global innovator and producer of catalysts for the refinery, emissions control and petrochemical industries. Our refining services business is a leading provider of recycling services to the North American refining industry. Our performance chemicals business is a silicates and silicas producer with leading supply positions in North America, Europe, South America, and Asia serving diverse and growing end uses such as personal and industrial cleaning products, fuel efficient tires, surface coatings, and food and beverage products. Our performance materials business is a leading producer of reflective marking materials for highways and engineered glass beads that are used in a variety of applications.

### **2. Policies and procedures in relation to slavery and human trafficking.**

Our [Code of Conduct](#) states that (1) it is the policy of the Company to comply with all applicable laws, including laws and regulations regarding slavery and human trafficking, and (2) employees are encouraged to report any suspected violations of the Company’s Code of Conduct to their human resources department, the Company’s general counsel or to our Concern Line (described below). Violations of the Company’s Code of Conduct, including participation in or failure to report incidents of slavery or human trafficking, are grounds for disciplinary measures, including termination of employment with the Company.

The Company also expects all of its Suppliers to conduct their businesses in an ethical and lawful manner as part of their continued business relationship with the Company. Our [Supplier Code of Conduct](#) explicitly prohibits the trafficking of persons and the use of any form of slave, involuntary, bonded, indentured or prison labor. Contractual provisions requiring compliance with our Supplier Code of Conduct are being implemented on a rolling basis as existing Supplier contracts expire and as new Supplier contracts are being entered into. Violations of the Supplier Code of Conduct may result in termination of the relationship with the Supplier.

**3. Due diligence processes in relation to slavery and human trafficking, and assessing and managing risk**

The Company encourages its employees to actively and promptly report violations of the Company's Code of Conduct without fear of retribution. The Company has established and publicized a toll-free, 24-hour Concern Line that is operated by a third-party. Through our Concern Line, employees can report violations of our Code of Conduct, failure to comply with laws or other areas of concern. Information received through the Concern Line is reviewed by senior management, and each call made to the Concern Line is thoroughly investigated. Appropriate action is taken when matters reported through the Concern Line are found to be credible.

The Company periodically conducts preannounced site visits at its Suppliers' facilities as part of its overall supplier-management strategy. If our employees observe conditions indicating that the Supplier is not adhering to legal or contractual requirements -- including with respect to labor practices or violations of slavery or human trafficking prohibitions -- these observations must be communicated to management and will be thoroughly investigated. Following investigation, appropriate action, up to and including termination of the Supplier relationship, will be taken if warranted.

**4. Certification by suppliers that their products comply with local laws and regulations, including those regarding slavery and human trafficking.**

The Company's contracts with its Suppliers require Suppliers to comply with all applicable laws, which include laws and regulations regarding slavery and human trafficking. The Company is also planning to implement a certification process by which Suppliers will be required to certify compliance with our Supplier Code of Conduct.

**5. Training on slavery and human trafficking to employees and management having direct responsibility for supply chain management.**

All Company employees receive periodic training concerning the Company's Code of Conduct. Such training includes modules on compliance with laws and the Company's labor standards.

This statement was approved by the Board of PQ Corporation effective as of March 1, 2019.

By:   
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Joseph S. Koscinski, Vice President, General Counsel and Secretary