UK Modern Slavery Act Transparency Statement

Cabot Corporation (“Cabot”) makes this statement pursuant to Section 54(1) of the UK Modern Slavery Act 2015 for the fiscal year ended September 30, 2019. Cabot is committed to conducting its business with integrity and in accordance with the highest ethical standards. Cabot supports and values human rights and is committed to complying with all applicable laws and standards, including laws pertaining to slavery and human trafficking.

Organization

Cabot Corporation (NYSE: CBT) is a global specialty chemicals and performance materials company, headquartered in Boston, Massachusetts. The company’s principal products are rubber and specialty grade carbon blacks, specialty compounds, fumed metal oxides, activated carbons, inkjet colorants, and aerogel. Cabot and its affiliates have manufacturing facilities and operations in more than 20 countries around the globe.

Policies related to Slavery and Human Trafficking

Cabot has implemented and enforces a number of global policies to support Cabot’s commitment to fundamental human rights, fair labor practices and the prohibition on child and forced labor.

Human Rights Policy:

Cabot supports and values human rights and is committed to complying with all applicable laws and standards related to labor practices and human rights in all our operating locations. We also respect international human rights principles aimed at promoting and protecting human rights, including:

- The UN Universal Declaration of Human Rights
- The International Covenant on Civil and Political Rights
- The International Covenant on Economic, Social and Cultural Rights; and
- The International Labor Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work.

Code of Business Ethics:

Cabot has a comprehensive Code of Business Ethics which applies to Cabot’s Board of Directors, all Cabot employees, and Cabot’s consultants, contractors, suppliers and other business partners. It is based on a basic set of principles - each person is expected to meet the highest ethical standards in conducting Cabot business, comply with applicable laws and regulations, and act in accordance with Cabot’s Values. As stated in Cabot’s Code of Business Ethics, Cabot believes in doing business with suppliers and others who demonstrate high standards of ethical business behavior. In particular, with respect to Labor Practices and Human Rights, the Cabot Code of Business Ethics states:

We support and value human rights and are committed to complying with all applicable laws and standards relating to labor practices and human rights in all of our operating locations. This includes laws relating to child and forced labor.
Supplier Code of Conduct:

In 2010, Cabot implemented a Supplier Code of Conduct that has been distributed to over 10,000 suppliers worldwide in 14 languages. The Supplier Code of Conduct expressly prohibits Cabot’s suppliers from using forced labor of any kind. In particular, with respect to Labor Practices and Discrimination, the Supplier Code of Conduct states:

Suppliers are required to be in compliance with any local or national labor laws regarding compensation and working hours. Cabot values diversity and respects equal opportunity in employment. Cabot will not tolerate any supplier who engages in unlawful employment discrimination, child labor or forced labor practices.

Standard Purchase Order Terms and Conditions:

Cabot’s Standard Purchase Order Terms and Conditions require suppliers to demonstrate high standards of ethical business behavior, as well as guarantee compliance with Cabot’s Supplier Code of Conduct. There is also a provision giving Cabot the right to audit, or have audited, a supplier’s books and records to verify the supplier’s compliance with the Supplier Code of Conduct.

Due Diligence Processes and Training in Relation to Slavery and Human Trafficking

Cabot has processes in place to help ensure Cabot is sourcing only from suppliers that share Cabot’s values regarding respect for human rights, integrity and sustainability. To ensure Cabot’s policies are understood, implemented and enforced, Cabot conducts in-person training and review of the Supplier Code of Conduct with key suppliers on a periodic basis. Cabot also uses an internal supplier qualification process for new suppliers and periodically re-qualifies current suppliers to obtain current, accurate and complete information about the supply chain.

As stated in the Supplier Code of Conduct, Cabot reserves the right to terminate its business relationship with any supplier that violates the principles set forth in the Supplier Code of Conduct, including provisions related to illegal human trafficking or forced labor.

All Cabot employees receive annual training on Cabot’s Code of Business Ethics. Cabot’s purchasing function conducts additional training for its members responsible for supplier management on the importance of Cabot’s supplier qualification processes and ensuring that Cabot only engages with suppliers who demonstrate they meet Cabot’s standards. The purchasing function also conducts training on topics of human trafficking and slavery.

Cabot has an Office of Compliance that oversees Cabot’s compliance with laws and regulations, the Code of Business Ethics and other Cabot policies. Employees are encouraged to contact the Office of Compliance to ask questions, raise concerns and report violations of Cabot policies or the law. Cabot also maintains a reporting Hotline that is available to all Cabot employees globally seven days a week, 24 hours per day, that is staffed by trained third party representatives with access to interpreters that speak the local language.
This Statement was approved by the Board of Directors of Cabot Corporation on March 13, 2020.

Sean D. Keohane
President and Chief Executive Officer