

**MODERN SLAVERY ACT STATEMENT
SLAVERY AND HUMAN TRAFFICKING TRANSPARENCY STATEMENT
FOR THE FINANCIAL YEAR ENDING DECEMBER 31, 2018**

This Statement is made pursuant to Section 54 (Part 6) of the Modern Slavery Act 2015 ("Act") and sets out the steps that SI Group, Inc. and its related affiliates, including but not limited to, SI Group-UK, Ltd., Addivant USA, LLC dba SI Group, Addivant UK Limited, and Addivant Switzerland GmbH, (all entities collectively hereafter referred to as "SI Group") have taken during the previous financial year to understand all potential modern slavery risks in relation to its business and to put in place steps aimed at ensuring that there is no slavery or human trafficking within its own business or in any of its supply chains.

COMPANY OVERVIEW:

SI Group, Inc. is a leading global developer and manufacturer of performance additives and chemical intermediates headquartered in Schenectady, New York. On October 15, 2018, SI Group, Inc. was acquired by SK Capital Partners, a private investment firm focused on specialty materials. SK Capital combined SI Group, Inc. with Addivant, another SK Capital portfolio company, to create the current SI Group. The newly combined company has locations all over the world and is a global technology and industry leader in the production of performance additives, process solutions, pharmaceuticals and chemical intermediates, with strong market positions in the plastics, rubber, fuel & lubricants, oilfield and active pharmaceutical ingredients industries. More information on SI Group and its business can be found at <https://siigroup.com/about.asp>.

SUPPLY CHAIN:

SI Group is committed to full compliance with all applicable laws, rules and regulations with respect to the conduct of our business and expects a similar commitment from all business partners doing business with SI Group. SI Group sources a wide range of goods and services from suppliers all over the world. In all business dealings with those suppliers it strives to ensure that the highest ethical standards are always reached. We currently conduct due diligence on our supply chain partners and try to ensure that we only do business with those partners who exercise the same core values in the conduct of their business. Additionally, legacy SI Group provided SI Group Global Supplier Questionnaires to its top raw material spend suppliers. This Questionnaire assessed a supplier's policies and practices in several areas including Labor and Social Responsibility, as well as Environment, Health, Safety and Security. The Questionnaire specifically asks the supplier to guarantee that forced labor is not used in their company and that workers enter voluntarily into employment. SI Group plans to send this Questionnaire out to a broader cross section of suppliers in the next year, including legacy Addivant suppliers.

While SI Group has taken these steps to evaluate its suppliers, there is still work to do to identify areas of risk and the best ways to manage that risk. SI Group is in the process of conducting a risk assessment to identify if there are areas in the supply chain that may pose a greater risk of modern slavery or other human rights violations. SI Group can then decide how any identified risks can be investigated, and if issues are found, how they can best be remediated or mitigated through activities such as industry collaboration or improved purchasing practices internally.

ORGANIZATIONAL POLICIES:

SI Group, Inc. recently implemented a Global Code of Conduct in September 2017. The Code specifically addresses the prohibition of the use of child labor or forced and compulsory labor. At the time of roll-out of the Code of Conduct, all employees were required to certify that they read and understood the Code of Conduct and agreed to conduct themselves in accordance with all policies set forth in the Code. Addivant affiliates also had a Code of Conduct that applied to its business operations. SI Group is taking steps to harmonize its policies across the new organization and is in the process of rolling out the SI Group Global Code of Conduct to all employees working in legacy Addivant sites. Similar certifications will be collected from these employees. All new employees are provided a copy of the Global Code of Conduct and asked to make such certification at the time of hire. The Code includes a detailed description on how employees can report any potential violations of the Code, including the ability to make an anonymous report using SI Group's hotline or reporting website. The reporting hotline and information on submitting an on-line report can be found at www.siigroup.com/LivingOurValues


TRAINING

Each employee is provided ongoing training on the Code of Conduct and can raise any questions or concerns regarding the Code of Conduct, including a suspicion of a violation of the Modern Slavery Act, during such training or at any time using one of the various reporting methods set out in the Code.

Approval by SI Group Board of Directors

I, Patrick Weinberg, as a Director of SI Group, Inc., hereby certify that the information contained in the above FY2018 Slavery and Human Trafficking Transparency Statement is factual and has been approved by the Board of Directors of SI Group, Inc., as well as the Board of Managers for SK Mohawk Group, S.à r.l, the common, indirect owner of all SI Group and Addivant operating entities.

SI GROUP, INC.

By: 
Patrick Weinberg
Director

Dated: March 29, 2019