

## Corporate Responsibility Statement

### Policy

Cookson recognises that its operations impact a wide community of stakeholders, including investors, employees, customers, business associates and local communities and that appropriate attention to the fulfilment of its corporate responsibilities can enhance overall performance. In structuring its approach to the various aspects of corporate social responsibility, the Company takes account of guidelines and statements issued by stakeholder representatives and other regulatory bodies from around the world.

Social, environmental and ethical matters are reviewed by the Board, particularly as regards the impact such matters may have on the Group's management of risk and the internal control systems in place for addressing any significant associated risks.

### Code of Conduct

The Company has a Code of Conduct ("Cookson Code"), which has been distributed throughout the Group in 25 languages and by which all its businesses are required to operate. The Cookson Code emphasises the Company's commitment to compliance with the highest standards of legal and ethical behaviour. The Cookson Code is reproduced in full on the Company's website.

As stated in the Cookson Code, the primary goal of Cookson is the protection and advancement of the interests of investors by providing attractive returns on a long-term basis. In striving to achieve this goal, management must conduct its business in a responsible manner, while engaging in careful risk-taking as an essential ingredient of business success. The Cookson Code requires that particular care be given to the preservation and protection of Group assets by making prudent and effective use of resources. Long-term customer satisfaction is recognised as being essential to the attainment of Group goals, which means listening carefully to customers' product and service requirements and maintaining a reputation for integrity in all business and other dealings.

The Group can only achieve its goals through the efforts of its employees. Cookson recognises that job satisfaction requires working environments that motivate employees to be productive and innovative, and which provide opportunities for employee training and development to maximise personal potential and develop careers within the Group. Cookson believes that wherever in the world they work employees have the right to be treated in good faith and on the basis of respect for the dignity of the individual.

The Cookson Code requires all Group companies to ensure that recruitment, training, promotion, career development, termination and similar employment-related issues are based on individual ability, achievement, experience and conduct without regard to race, colour, nationality, culture, ethnic origin, religion, sex, sexual orientation, age, disability or any other reason not related to job performance or prohibited by applicable law.

The Cookson Code requires all employees, officers and Directors to have a duty of loyalty to the Group. Individuals may not use their positions to profit themselves or others at the expense of the Group. Personal interests that do, may or might appear to conflict with Group interests or improperly influence the performance of an individual's duties must be avoided at all times.

Cookson seeks to be a good corporate citizen wherever it conducts business. The Cookson Code requires employees to observe all national and local laws and never seek to gain any advantage through the inappropriate use of payments, business courtesies or other inducements. Bribery is strictly prohibited. Group businesses must respect and take into account regional and local concerns, customs and traditions.

### Helpline

Cookson has a 24-hour Employee Business Concern Helpline telephone and email facility. This is operated by a professional, external provider of employee support, counselling and business concern services, which provides Cookson's employees and business associates worldwide with an independent and confidential service through which to register any concerns about any incorrect or irregular practices they perceive in Cookson's workplace. With the express permission of the caller or email correspondent, the service provider reports any matters raised to a designated team at Cookson's Head Office for investigation.

## Health, Safety and Environmental Statement

### Policy

Cookson has a Health, Safety and Environment ("HS&E") Policy based on the principle of operating in a manner that preserves health, safety and a sound environment. For Cookson companies worldwide, the minimum acceptable standard is to meet their legal HS&E obligations, however, the aim is to improve continually. Cookson believes that good HS&E performance is an integral part of effective and profitable business management. The policy, which is reviewed regularly, is available in full on the Group's website, [www.cooksongroup.co.uk](http://www.cooksongroup.co.uk).

### Management systems

The Board assumes ultimate responsibility for HS&E policy and for monitoring its implementation, while executives and line managers are directly responsible for HS&E matters in the operations under their control. A reporting system is in place to collect, collate and report on HS&E matters, including key performance indicators. Advice and support is available from the corporate HS&E function, led by the Group Head of HS&E who reports on these matters to the Board.

During 2008, the number of Cookson locations with certification to ISO 14001, the international standard for environmental management systems, and OHSAS 18001, the standard for health and safety management systems, increased, principally as a result of the Foseco acquisition. The Group now has 60 locations certified to ISO 14001 and 29 locations certified to OHSAS 18001.

### Performance

Since 2004, Cookson has operated a programme aimed at reducing energy use and the associated emissions of carbon dioxide ("CO<sub>2</sub>"), the principal greenhouse gas. The programme trains employees to understand energy use and conservation principles and introduces energy audits to assist high-use sites in identifying and implementing

conservation measures. During 2008, Cookson conducted energy audits and prepared energy use-reduction plans at 17 facilities. These efforts have yielded a 3.4% reduction in gas use and a 6.7% reduction in electricity use from 2007 to 2008, excluding the impact of the Foseco acquisition.

A number of Cookson companies in the US have been named as potentially responsible parties under the Superfund law for wastes disposed of at sites owned by third parties. Although likely Group costs depend on many factors, the few cases that remain active are expected to be settled within the amounts already provided.

Like many manufacturers, some Group companies have potential environmental liabilities because of past operations at their current or former sites. Where remediation is required, Cookson environmental managers and external specialists work with government authorities to ensure that remediation is conducted effectively and efficiently.

### Compliance

A small number of enforcement notices were issued to Cookson companies in 2008, including several that assessed minor penalties. One civil court action for alleged non-compliance with waste management requirements associated with managing an inactive site was filed against a Cookson company in 2006. The company expects to settle the case in 2009.

### REACH

Cookson companies began implementing the European regulation for the Registration, Evaluation, Authorisation and Restriction of Chemicals ("REACH") in 2008. Each chemical manufacturing business established a team to address REACH obligations. The businesses filed appropriate pre-registrations by the statutory deadline and contacted suppliers to ensure that the chemicals necessary for future operations would remain available.

### Workplace

Cookson's success depends on retaining the commitment of the people who work within it. The Group strives to ensure that employees have a safe environment in which to work and that employment practices are fair and equitable.

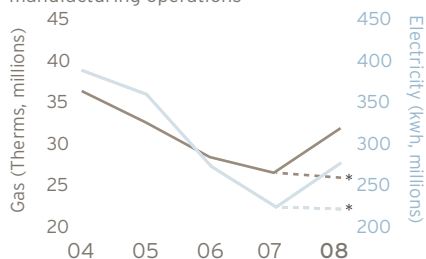
### Safety

Cookson's goal is zero work-related injuries and illness. To achieve this, a worldwide initiative was commenced in 2002 to improve safety performance, with a particular focus on applying sound risk assessments and ergonomic principles. The programme includes minimum standards of performance, targeted assistance to higher risk sites and a variety of training and awareness activities. To ensure continued progress, the Group set, in early 2007, a target of a further reduction in injury and illness rates of 30% by the end of 2009. In 2008, Cookson's largest division initiated a "Safety Breakthrough" campaign in response to several serious accidents and to renew emphasis on safety performance with a heightened focus on ensuring satisfactory health and safety environments in customers' locations where Cookson employees are required to work. By the end of 2008, Cookson's overall recordable injury rate had improved by 27% percent over the 2007 rate, and the rate of injuries that caused days away from work improved by 12% compared to the 2007 rate.

During 2008, Cookson continued to focus on the elimination of work-related injuries through better application of ergonomic principles. The last five years have seen extensive ergonomic training throughout the Group and the establishment of ergonomic teams at a number of facilities, leading to a significant improvement in their performance. Additional information on HS&E matters can be found on the Group's website - [www.cooksongroup.co.uk](http://www.cooksongroup.co.uk).

### Energy Consumption

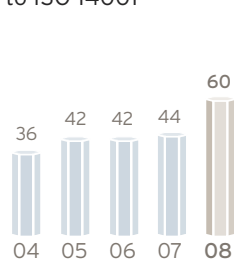
manufacturing operations



— Electricity use  
— Gas use

\* Excluding Foseco

### Facilities certified to ISO 14001



### Rate of injuries & illness that resulted in absence from work per 100 employees

