



# CORPORATE HUMAN RIGHTS MANAGEMENT PLAN

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Humans Rights  
Cross-Functional  
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# Section 1

## Overview

The Corporate Human Rights Management Plan (The Plan) supports the implementation of the commitments set out in our Human Rights Policy, Global Standards of Business Conduct, Supplier Risk Assessment Protocol, Supplier Code of Conduct, and Global Procurement & Responsible Sourcing Policy, as well as applicable laws and regulations. It outlines our approach to the identification, prevention, mitigation, remediation, and accountability for human rights impacts that have been caused, contributed to, or directly linked to Solenis. The Plan applies to all Solenis employees, contractors, suppliers, and other stakeholders affected by the company's operations or supply chain.

The Plan includes our Remedy Framework, reflecting our dual responsibility to prevent adverse impacts and to respond effectively if they occur. The Plan emphasizes a proactive approach to identifying and preventing potential human rights impacts, while the Remedy Framework provides a structure for addressing adverse human rights impacts when they do occur—seeking to provide those affected with fair, timely, and appropriate redress.

## Human Rights

Solenis respects individuals' human rights, recognizing them as the basic rights and freedoms to which everyone is entitled, regardless of ethnicity, color, gender, sex, age, language, religion, political or other opinion, national or social origin, property, birth, or other status.

Solenis' approach to respecting human rights is guided by the following international frameworks:

- The Universal Declaration of Human Rights (UDHR);
- 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.

Solenis has also incorporated principles of the United Nations Global Compact (UNGC) and the UN Sustainable Development Goals (SDGs) into its initiatives and policies, as outlined in our annual sustainability reports, prepared in accordance with the Global Reporting Initiative (GRI).

## Methodology

The Plan has been informed by Solenis' double materiality assessment (DMA) completed in 2024, in alignment with the European Union's Corporate Sustainability Reporting Directive (CSRD). The DMA considered both financial and non-financial risks, including potential impacts of our business on stakeholders and rightsholders. As a result, it identified several material topics relevant to Solenis' human rights management:

- Economic, social, and cultural rights in affected communities;
- Equal treatment and opportunities across our workforce and supply chain; and
- Working conditions across our workforce and supply chain.

Additionally, Solenis conducted a Human Rights Gap Assessment in 2025 as part of our ongoing commitment to strengthening our sustainability and human rights practices. We identified key areas for improvement to better align with leading international standards, including the United Nations Guiding Principles (UNGPs) and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct.

## Definitions

The Plan uses the following terms and definitions (Figure 1):

**Figure 1: Terms and Definitions**

Term	Definition
<b>Adverse Human Rights Impact</b>	A negative effect on the enjoyment of human rights, caused or contributed to by Solenis or linked to our operations, products, or services. An actual impact refers to one that has already occurred, whereas a potential impact represents a risk or outcome that could occur in the future.
<b>Affected Stakeholders</b>	Individuals or groups who have been or may be affected by Solenis' operations, including employees, contractors, workers in the supply chain, and local communities, including Indigenous Peoples.
<b>Cause, Contribute, Linked</b>	The relationship of Solenis to an actual or potential impact: – Cause: Direct action or inaction by Solenis – Contribute: Involvement alongside others – Linked: Impact by a third party in our supply chain
<b>Child Labor</b>	Employment of children below the legal minimum age or under 18 in work that is dangerous and interferes with their schooling. Prohibited in all Solenis operations and supply chains.
<b>Collective Bargaining &amp; Freedom of Association</b>	Fundamental human rights that empower workers to organize, negotiate, and advocate for improved working conditions.
<b>Concerns</b>	Allegations of suspected or known violations of the law, the Global Standards of Business Conduct, and/or Solenis' policies or procedures.
<b>Contingent Workers</b>	Individuals contracted through a third party and whose scope of work and/or work environment is directly controlled by Solenis.
<b>Data Privacy</b>	The protection of personal information in accordance with global and local privacy regulations.
<b>Discrimination</b>	Unfair or unequal treatment of employees based on personal protected characteristics within internal company operations.
<b>Due Diligence</b>	An ongoing process to identify, assess, prevent, mitigate, and account for how Solenis addresses actual and potential adverse impacts.
<b>Effective Remedy</b>	A legitimate, accessible, predictable, equitable, transparent, rights-compatible, and timely response to adverse impacts, based on engagement and dialogue, and providing a source of continuous learning.
<b>Employee Representative Bodies</b>	Organizations certified or otherwise recognized for the purpose of bargaining or consulting on behalf of employees, inclusive of unions, works councils, and health and safety committees.
<b>Employees</b>	Individuals under direct contract with Solenis and whose scope of work is within our control, inclusive of all time types and management levels. Excludes contingent workers, external contractors and consultants.
<b>Forced Labor &amp; Modern Slavery</b>	Work that is involuntary or coerced through threats, debt, detention, or deception. Prohibited under all Solenis codes and contracts.
<b>Grievance Mechanism</b>	A channel (e.g., Share Your Concern) where individuals or groups can raise their concerns safely and confidentially.

<b>Human Rights</b>	Fundamental entitlements and freedoms of all people, as articulated in the UDHR, ILO Conventions, and related international instruments.
<b>Illegal Forms of Labor</b>	Refers to employment practices that violate national laws or international labor standards.
<b>Investigation</b>	A privileged and confidential internal inquiry process, by which Solenis, with or without the involvement of a third party, seeks to establish facts and reach conclusions regarding reported concerns and recommend remediation or disciplinary measures.
<b>Non-Discrimination &amp; Equality</b>	Equal treatment regardless of gender, race, religion, age, disability, sexual orientation, or other protected characteristics.
<b>Non-Retaliation</b>	A policy commitment that no person will suffer negative consequences for raising a concern or filing a grievance in good faith.
<b>Remedy</b>	Measures to make amends for harm, including financial compensation, apologies, policy changes, and guarantees of non-repetition.
<b>Rightsholder</b>	Any individual or community entitled to human rights, including employees, supply chain workers, and impacted communities.
<b>Safe &amp; Healthy Workplace</b>	Supporting the physical, mental, and emotional well-being of workers within internal company operations.
<b>Salient Human Rights Issues</b>	The human rights at greatest risk of severe negative impact through Solenis' activities or business relationships.
<b>Share Your Concern</b>	Solenis' system enabling anonymous, confidential, and secure issue-raising and case management.
<b>Stakeholders</b>	Anyone who can be affected by or influence our operations, including community residents and our own workforce; businesses; governments, including schools and transportation agencies; first responders such as firefighters, police and response teams; public and private utilities; and NGOs.
<b>Vulnerable Groups</b>	Populations and communities at heightened risk of human rights impacts, including women and migrant workers, as well as individuals and communities who may be vulnerable or marginalized due to age, disability, socio-economic status, Indigenous identity, migration status, gender identity, or other demographic factors.
<b>Working Conditions</b>	The environment, terms, and circumstances under which employees perform their jobs. This includes not only the physical setting but also the organizational culture, compensation structure, job security, and treatment of employees.

## Section 2

### Commitment to Human Rights

The Plan is firmly grounded in both Solenis' internal human rights commitments and globally recognized international standards.

### International Standards

The Plan aligns with key international human rights instruments that provide an authoritative framework for business responsibility to respect human rights:

- **ILO Core Conventions**: The Plan upholds the rights enshrined in the ILO’s eight fundamental Conventions, covering freedom of association, collective bargaining, non-discrimination, and the elimination of forced and child labor.
- **The UNGPs**: The Plan has been informed by the UNGPs, which provide 31 principles outlining the state duty to protect human rights, the corporate responsibility to respect human rights, including across the supply chain, and the shared responsibility to ensure affected people have access to affective remedy.
- **The OECD Guidelines**: The Plan has also been informed by the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, which promote positive contributions to economic, environmental and social progress while minimizing adverse impacts that may be associated with business operations, products and services.

## Internal Commitments

The Plan supports and operationalizes Solenis’ human rights commitments, as established in the following policies:

- **Global Standards of Business Conduct**: The Global Standards of Business Conduct (the Code) outlines expected ethical behavior for all Solenis employees and business partners. It includes clear guidance on respecting labor rights, opposing discrimination and harassment, and speaking up through grievance mechanisms.
- **Supplier Code of Conduct**: The Supplier Code of Conduct (SCoC) outlines expected ethical behavior for all Solenis suppliers worldwide. It includes clear guidance on respecting labor rights, opposing discrimination and harassment, and speaking up through grievance mechanisms.
- **Human Rights Policy**: This policy affirms Solenis’ commitment to upholding the dignity and rights of all individuals affected by its operations, products, and business relationships. It recognizes the responsibility to respect human rights as defined by international norms and reinforces Solenis’ duty to avoid causing or contributing to adverse human rights impacts. We make specific commitments regarding:
  - Non-discrimination, including on the basis of sex, gender identity, and other protected characteristics;
  - Workplace environment and equal opportunity;
  - Health and safety;
  - Compensation;
  - Forced labor, human trafficking and working time, including overtime and working hours practices;
  - Children and young workers;
  - Freedom of association and collective bargaining; and
  - Data privacy.

## Internal Compliance

In addition to our core policies, we have integrated responsible business conduct into other relevant policies and systems to support human rights and decent working conditions across corporate governance practices (Figure 2).

**Figure 2: Solenis Policies relevant to Human Rights**

Document Title	Document Number	Description
<b><u>Americans with Disabilities Act (ADA) Policy</u></b>	SL-POL-003.009	Affirms our commitment to equal opportunity by complying with the Americans with Disabilities Act, defining disability broadly, and providing reasonable accommodations to qualified individuals with disabilities to support employment and job performance.
<b><u>Anti-corruption Policy</u></b>	SL-POL-004.004	Reinforces a culture of integrity and requires compliance with anti-bribery and anti-corruption laws in operating jurisdictions

and countries.

<b><u>Anti-harassment Policy</u></b>	SL-POL-003.001	Establishes zero tolerance for the harassment of or by employees or others.
<b><u>Community Relations Policy</u></b>	SL-POL-001.005	Sets out our commitment and approach to conducting community relations activities with stakeholders – including government agencies and first responders – and communities surrounding production operations.
<b><u>Conflict Minerals Policy</u></b>	SL-POL-008.012	Outlines our commitment to procurement of raw materials, intermediates or other goods in compliance with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Conflict Minerals Rule) issued by the U.S. Securities and Exchange Commission (SEC) as well as the EU Conflict Minerals Regulation.
<b><u>Conflicts of Interest Policy</u></b>	SL-POL-004.002	Requires Solenis employees to report or disclose any conflicts of interest encountered in the workplace.
<b><u>Equal Employment Opportunity Policy</u></b>	SL-POL-003.010	Affirms our commitment to be an equal opportunity employer, with zero tolerance for discrimination in hiring or employment-related decisions.
<b><u>Global Standards of Business Conduct</u></b>	Not applicable	Sets out Solenis' values and ethical principles for the behavior of the business, its employees and any business partners.
<b><u>Hiring Due Diligence Protocol</u></b>	SL-PRT-002.001	Outlines our commitment and approach to promote, respect, and support basic human rights through company processes related to hiring and onboarding new employees.
<b><u>Human Rights Policy</u></b>	SL-POL-004.030	Details our commitments to respecting human rights across our activities and supply chain and raising awareness of these.
<b><u>Investigations Policy</u></b>	SL-POL-004.003	Outlines our approach to conducting investigations regarding allegations of suspected or known misconduct or violations of applicable laws or Solenis' Global Standards of Business Conduct and supporting policies and procedures.
<b><u>Labor Practices Commitment Policy</u></b>	SL-POL-003.006	Sets out our commitment to upholding labor rights and providing fair and compliant labor conditions across our operations and supply chain.
<b><u>Process Safety Management Policy</u></b>	SL-POL-005.002	Outlines our commitment to operating facilities in accordance with the Responsible Care® Process Safety Code.
<b><u>Global Procurement &amp; Responsible Sourcing Policy</u></b>	SL-POL-008.000	Describes our process for evaluating, selecting, onboarding, and managing the performance of suppliers, subcontractors, and consultants.
<b><u>Reporting Policy</u></b>	SL-POL-004.013	Describes our approach and process for employees and others to report suspected or known misconduct or violations of applicable laws or Solenis' Global Standards of Business Conduct and supporting policies and procedures.
<b><u>Responsible Care® - Environmental, Health, Safety and Security Policy</u></b>	SL-POL-005.000	Outlines our commitment to protecting the environment and ensuring the health, safety, and security of workers, their families, customers and communities, and to operating facilities in accordance with the principles of Responsible Care®.
<b><u>Responsible Palm Oil Sourcing Policy</u></b>	SL-POL-008.010	Describes our objective to qualify and maintain suppliers whose attributes and behaviors protect Solenis from safety-based, financial, and ethical risks pertaining to palm oil.
<b><u>Supplier Code of Conduct</u></b>	SL-POL-008.007	Accompany the Global Standards of Business Conduct to specifically apply to Solenis' conduct in working with suppliers.
<b><u>Supplier Diversity Policy</u></b>	SL-POL-008.011	Outlines our commitment to identify and use, as appropriate, certified minority- and women-owned suppliers as part of

		overall sourcing activities.
	SL-PRT-001.003	Establishes process steps to proactively identify, assess, and mitigate supplier risks.
<b><u>Sustainability Policy</u></b>	SL-POL-005.001	Outlines our commitment to ethics and compliance, continuous improvement, environmental stewardship, diversity, equity and inclusion, human rights, security, and worker health and safety across operations and the supply chain.
<b><u>Whistleblowing Privacy Notice</u></b>	Not applicable	Reinforces a secure and confidential way for employees, contractors, suppliers, and other stakeholders to report suspected misconduct, legal or regulatory violations, or breaches of company policies, ensuring that personal data is processed in accordance with applicable laws.
<b><u>Workplace Violence Policy</u></b>	SL-POL-004.023	Sets out our zero tolerance for any threatened or actual workplace violence at Solenis facilities or anywhere that a Solenis employee is conducting Solenis business.

## Section 3

### Management Approach

Human rights due diligence is central to Solenis' continuous management of human rights risks. Our due diligence process is based on the OECD Due Diligence Guidance for Responsible Business Conduct (Figure 3) and outlined in more detail in the following sections.

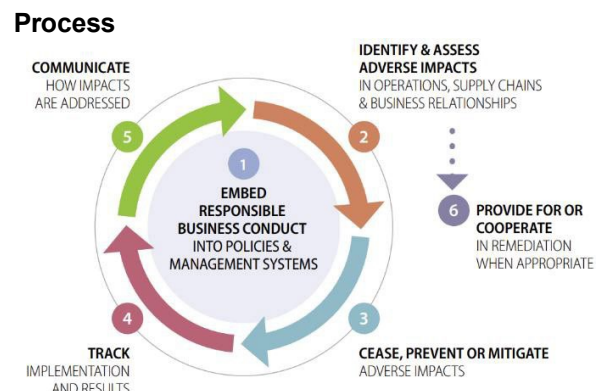


Figure 3: Human Rights Due Diligence

OECD, 2025

### Risk Assessment

As part of our commitment to upholding human rights across all areas of our business, Solenis integrates regular monitoring and review processes into our due diligence framework for our internal operations and supply chain to ensure alignment with our Human Rights commitments. Human rights assessments are conducted at least yearly for activities within scope as outlined in the Internal Operations Human Rights Risk Assessment and Supplier Risk Assessment Protocol. Other assessments may be conducted more frequently and whenever needed due to changes in business activities, regulatory developments, or identified risks. These reviews help us proactively identify, prevent, and address potential human rights risks across our operations and supply chain.

### Risk Categories

Solenis identifies and assesses human rights risks across its operations using defined risk categories. These categories reflect the potential for adverse impacts on individuals and communities. We continually review and update these categories as part of wider risk assessments to ensure they remain current and responsive to evolving conditions.

Risks are grouped into three thematic areas related to Solenis operations: labor and employment, environment, and local communities (Figure 4).

**Figure 4: Risk Categories by Thematic Area**

**Labor and Employment**



**Environment and Communities**

Negative Impact on Environment
<ul style="list-style-type: none"> <li>• Exposure to Pollution and Toxins</li> <li>• Unsafe Waste Management</li> <li>• Water Scarcity or Contamination</li> <li>• Climate Change Contribution and greenhouse gas emissions</li> <li>• Nature, biodiversity and ecosystems</li> <li>• Impact on Indigenous or Vulnerable Communities</li> <li>• Lack of Transparency or Stakeholder Engagement</li> <li>• Untimely Notification of Concerns or Exposure Risks</li> </ul>

Well-being, Health & Safety of Communities
<ul style="list-style-type: none"> <li>• Poor Community Engagement</li> <li>• Inadequate grievance and remedy mechanisms</li> <li>• Displacement Without Support</li> <li>• Inadequate Emergency Response Preparedness</li> <li>• Strain on Local Infrastructure</li> <li>• Failure to Respect Cultural or Indigenous Rights</li> <li>• Social or Economic Exclusion</li> <li>• Security or Community Health and Safety incidents</li> </ul>

## Risk Evaluation Criteria

To support consistent and objective assessment of human rights risks, Solenis applies a structured evaluation framework based on likelihood and impact. Likelihood refers to the probability of a risk occurring, while impact denotes the potential consequences of the risk to the business. The criteria are regularly assessed to ensure responsiveness to global developments that may alter human rights risk levels. Additional criteria beyond those listed below are considered when evaluating likelihood and impact.

**Figure 5: Likelihood and Impact Scales**

### Likelihood Scale

1 = Very Unlikely	2 = Unlikely	3 = Possible	4 = Likely	5 = Almost Certain
Remote probability that the event or condition will occur	Do not expect the event or condition to occur	There is a possible chance of the risk occurring	Strong possibility that the event or condition will occur	Certainty or highly probable that the event or condition will occur

### Impact Scale

	1 = Very Low	2 = Low	3 = Medium	4 = High	5 = Very High
<b>Financial</b>	Financial risk of (<\$10MM)	Financial risk of (\$11-25MM)	Financial risk of (\$26-50MM)	Financial risk of (\$51-100MM)	Financial risk of (>\$100MM)
<b>Reputational</b>	Negligible risk of negative media coverage	Negative media coverage does not affect new business opportunities or client relationships	Negative media coverage mildly affects new business opportunities or client relationships	Reputational damage from negative media coverage results in some loss of new business and clients	International negative media coverage results in the loss of new business and clients
<b>Operational</b>	Negligible effect on internal operations (people/systems)	Minor impact on systems, causing a slight increase in workload for	Noticeable disruption to internal operations due to system	Significant system outages, with people either leaving or	Complete breakdown of internal operations, preventing the

		people	failures and people departures	becoming overworked	business from functioning
<b>Compliance</b>	Negligible breach of regulation with no impacts	Minor breach of regulation that requires reporting to the regulator/courts	Breach of regulation that requires reporting to the regulator/courts and results in a fine or penalty	Breach of regulation that requires reporting to the regulator/courts and results in multiple fines, penalties, and litigation	Major breach of regulation that requires reporting to the regulator/courts and significant prosecution, fines, penalties, and litigation

## Risk Analysis

Once human rights risks are identified, Solenis conducts a structured assessment to determine their relationship to these risks, the root causes, and potential consequences for affected individuals or communities. This includes:

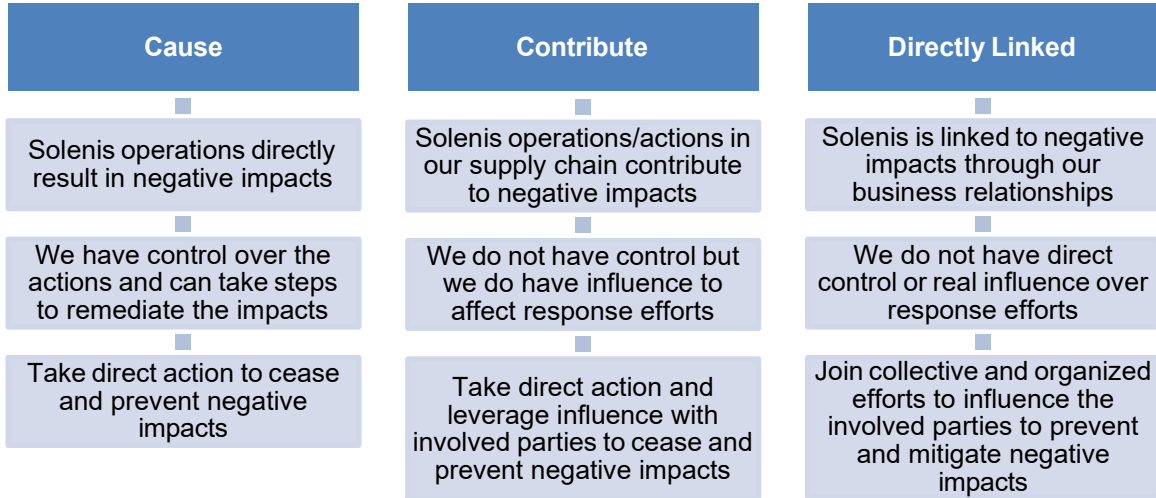
- Evaluating risks using the likelihood and impact criteria.
- Analyzing the relationship between the risk and the company (i.e. cause, contribute, directly linked).
- Analyzing the relationship between the risk and its underlying drivers (e.g., policy gaps, supplier practices, operational pressures).
- Engaging relevant stakeholders to understand context and lived experience.
- Considering human rights risks associated with mergers and acquisitions (M&A), including inherited labor practices, safety protocols, and access to grievance mechanisms. These risks are assessed pre-transaction and managed through integration measures.
- Prioritizing risks based on their salience and potential for harm.

This assessment informs both the design of prevention and mitigation measures, and the implementation of appropriate remediation strategies.

## Prevention and Mitigation Measures

Our efforts to prevent or mitigate human rights impacts are guided by our relationship to those impacts. This involves our assessment of whether Solenis caused, contributed to, or is directly linked to the harm through its operations, supply chain, or business relationships (Figure 6).

**Figure 6: Determining Solenis' link to the Harm**



### Where Solenis has Caused Impacts

Once Solenis' link to the harm has been determined, we then implement appropriate prevention or mitigation measures depending on the human rights issue (Figure 7).

**Figure 7: Prevention and Mitigation Examples by Human Rights Issue**

Health & Safety of Employees	Working Conditions	Illegal Forms of Labor
<ul style="list-style-type: none"> <li>• Implement global EH&amp;S Policy and certify sites to ISO45001, ISO14001, and RC14001</li> <li>• Conduct safety training, site-specific risk assessments, and provide PPE and medical evaluations</li> <li>• Maintain Safety Committees, crisis protocols, and confidential reporting channels</li> <li>• Offer EAPs, wellness and mental health platforms</li> </ul>	<ul style="list-style-type: none"> <li>• Conduct annual compensation benchmarking and pay equity reviews</li> <li>• Deliver mandatory training on workplace behavior and ethics, and ensure compliance with labor laws and global standards</li> <li>• Operate grievance mechanisms, employee feedback surveys, and implement DEI initiatives</li> </ul>	<ul style="list-style-type: none"> <li>• Prohibit all forms of forced labor through internal policies aligned with ILO conventions, and verify worker age at hiring</li> <li>• Restrict hazardous work to qualified adults</li> <li>• Implement standardized onboarding and conduct regular payroll audits</li> <li>• Require third-party labor providers to meet Solenis' labor standards and maintain grievance channels</li> </ul>

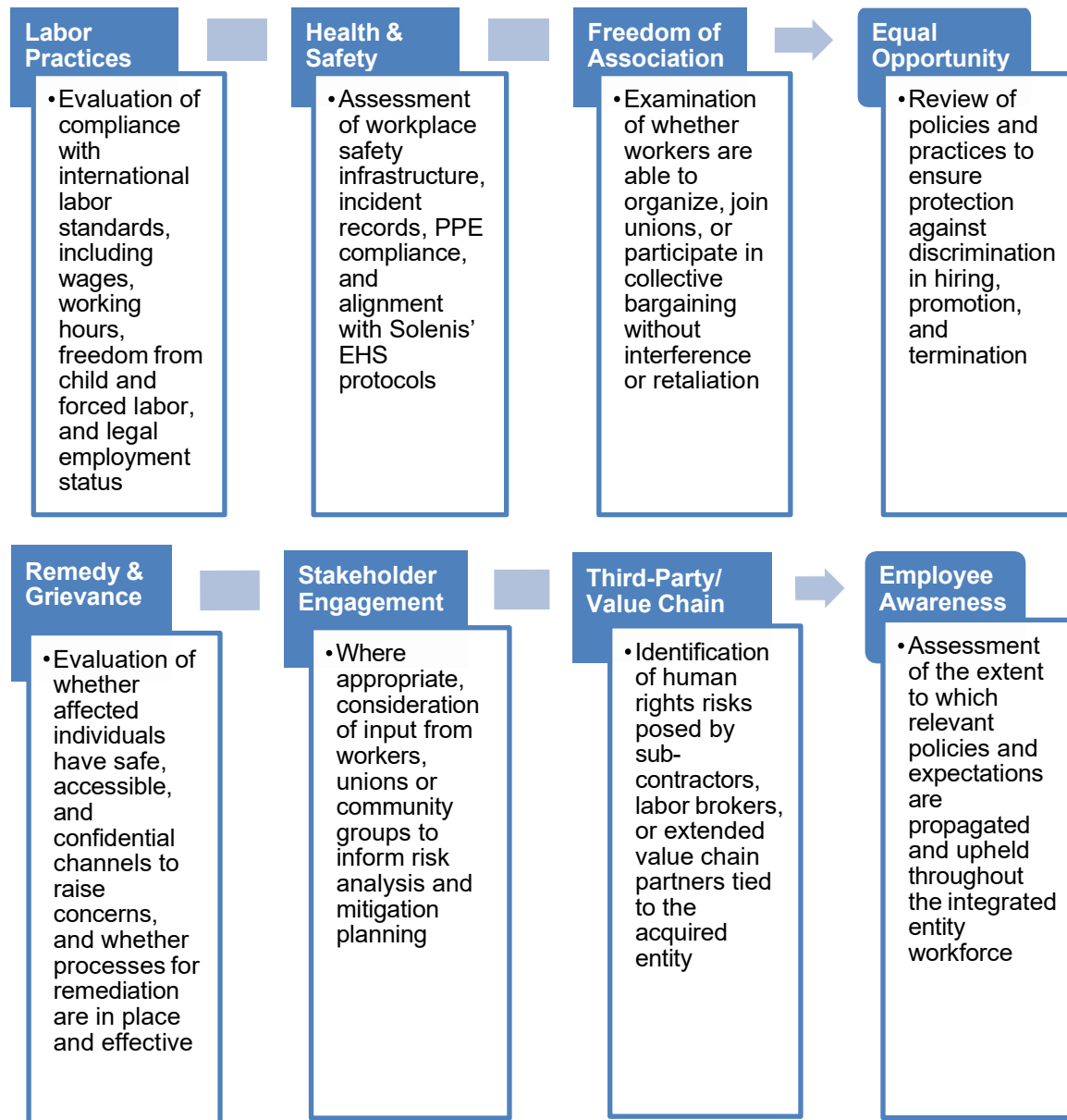
Discrimination	Freedom of Association & Collective Bargaining	Employee Data Security
<ul style="list-style-type: none"> <li>• Enforce Anti-Discrimination and Harassment Policies with formal complaint procedures and a confidential reporting platform</li> <li>• Deliver mandatory anti-harassment and unconscious bias training for employees, and inclusive hiring training for managers</li> <li>• Conduct annual pay equity reviews and cross-functional pay audits, with compensation adjustments implemented to advance pay equity. Tracking YOY gender pay equity.</li> </ul>	<ul style="list-style-type: none"> <li>• Maintain a Human Rights Policy affirming freedom of association and collective bargaining, and ensure compliance with local labor laws</li> <li>• Provide translated materials on organizing rights and support fair union recognition and engagement processes</li> <li>• Operate confidential grievance channels and assign HR team to meet regularly with representative bodies</li> </ul>	<ul style="list-style-type: none"> <li>• Conduct regular Data Protection Impact Assessments and multiple internal/external IT assessments per year</li> <li>• Apply anonymization techniques to employee data to protect individual privacy during analysis and reporting</li> <li>• Audit and respond to vulnerabilities, ensuring data use aligns with consent and relevant privacy laws and standards</li> </ul>

Environmental impacts on People	Well-being, Health & Safety of Communities
<ul style="list-style-type: none"> <li>• Company-wide goals on emissions reduction, water conservation and waste minimization</li> <li>• Environmental responsibility requirements across the value chain through the Supplier Code of Conduct</li> <li>• Participation in environmental stewardship partnerships with NGOs</li> <li>• ISO 14001 certified Environmental Management Systems</li> </ul>	<ul style="list-style-type: none"> <li>• Annual community engagement programs including environmental cleanups</li> <li>• Regular emergency preparedness and response training</li> <li>• Operate a Crisis Management Program with trained response teams and coordination for community-related incidents</li> <li>• Employee programs for community development, volunteerism and giving</li> </ul>

## Where Solenis has Contributed to Impacts

In addition to causing potential impacts, Solenis may also contribute to human rights impacts through merger and acquisition (M&A) transactions. As part of the due diligence process, Solenis assesses the target company's labor and human rights practices (Figure 8) – including working hour policies, the presence (or absence) of formal grievance mechanisms, and workplace safety protocols.

**Figure 8: M&A Assessment Examples by Human Rights Issue**



Once the business transaction is complete, Solenis takes a series of actions to ensure alignment with our human rights standards and, where needed, implements remediation, including, but not limited to:

- Educate the new entity's workforce on Solenis' Global Standards of Business Conduct and key policies, including mandatory training.
- Establish a formal grievance mechanism, including access to the Solenis hotline, supported by our Investigations and Reporting Policies.
- Implement standardized safety practices, such as safety committee formation, personal protective equipment (PPE) compliance, and regular audits, to align with Solenis' Environment, Health and Safety (EHS) standards.
- Review and update employment contracts to ensure compliance with international labor standards, including minimum age requirements, reasonable working hours, the right to freedom of association, and fair compensation in line with Solenis' living wage commitment.

These actions are carried out in collaboration with key stakeholders and apply to all employee types and demographics. We actively evaluate and mitigate identified risks to ensure timely alignment with Solenis' ethical standards, fostering a consistent culture of respect, inclusion, and accountability across all operations.

### Where Solenis is Directly Linked to Impacts

Solenis may be directly linked to human rights impacts through our own operations and business relationships, particularly with contractors and suppliers. We implement several measures to prevent and mitigate these potential impacts:

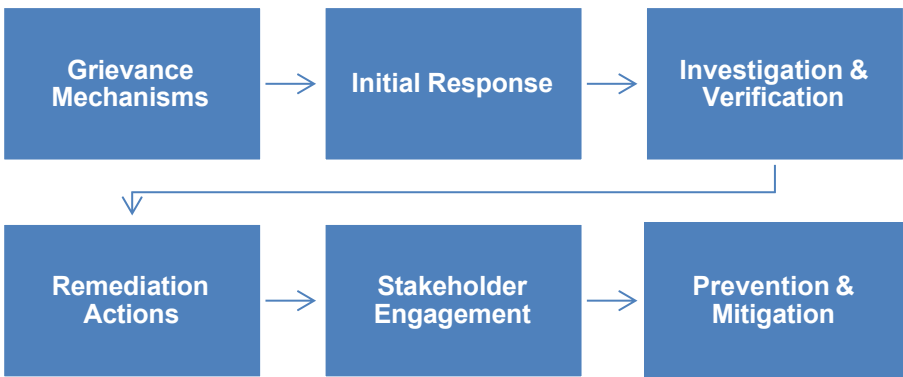
- As a member of the Supplier Ethical Data Exchange (SEDEX), Solenis requires production sites to complete self-assessments aligned with our SEDEX Members Ethical Trade Audit (SMETA) pillars. These cover key human rights issues and complement our internal risk management by identifying potential facility-level risks and reinforcing accountability.
- Business relationships with contractors and suppliers are managed through our Supplier Risk Management Program, as outlined in our Supplier Risk Assessment Protocol, Global Procurement & Responsible Sourcing Policy, and Modern Slavery Statement. Our enhanced Supplier Risk Management program provides a framework for identifying, scoring and mitigating risks associated with our direct suppliers in scope.

### Remedy Framework

#### Overview

At Solenis, we are committed to upholding internationally recognized human rights throughout our operations and supply chains. In alignment with the UNGPs, we recognize that effective remediation is a critical component of our broader human rights approach. The Remediation Pathway outlines the structured process we follow when a concern is raised, beginning with the submission of a grievance through our Share Your Concern platform or other platforms, and continuing through the initial response to investigation, remedy, engagement, and prevention (Figure 9). This pathway seeks to address concerns in a fair, timely, and transparent manner, and effectively address harms. It also enables us to learn from each case and strengthen our systems to prevent future impacts.

Figure 9: Remediation Pathway



### Assumptions and Limitations

The Remedy Framework makes certain assumptions in order for it to function:

- **Alignment with International Norms:** The Remedy Framework assumes that Solenis' operations and business relationships aim to comply with internationally recognized human rights standards, particularly

the UNGPs, OECD Guidelines for Multinational Enterprises, and ILO Core Labor Standards.

- **Good Faith Participation:** It is assumed that all parties involved in the grievance and remediation process, including affected stakeholders, employees, and business partners, seek to engage in good faith and participate honestly and constructively.
- **Stakeholder Accessibility:** The Remedy Framework assumes that stakeholders (e.g., workers, community members) have reasonable physical, digital, or representative access to Solenis' grievance mechanisms (e.g., the Share Your Concern platform or in-person channels).
- **Timely Disclosure:** It is assumed that adverse human rights impacts are identified in a timely manner, either through internal reporting or stakeholder feedback, enabling prompt investigation and remedy.
- **Non-Retaliation:** The company presumes a culture of non-retaliation, wherein individuals feel safe to report grievances without fear of punishment, intimidation, or reprisal.

While Solenis will always seek to overcome any limitations to providing or cooperating in remedy, there are certain limitations to the development and implementation of this Framework:

- **Jurisdictional Constraints:** Legal remedies or investigations may be constrained by the limitations of state-based judicial and non-judicial laws and mechanisms, regulatory requirements, or judicial inefficiencies in certain countries where Solenis or its suppliers operate.
- **Resource Limitations:** The availability of financial, human, or technical resources may limit the speed, scope, or scale of investigations or remediation actions, especially in remote or high-risk operational areas.
- **Third-Party Influence:** Where Solenis is linked (rather than causing or contributing to harm), the company's ability to cooperate in remedy may be limited by the level of leverage it has over third-party business partners or suppliers.
- **Cultural and Language Barriers:** Cultural norms, language differences, or mistrust may affect how communities and workers report grievances or engage with or perceive the effectiveness of the remedy process, which may be beyond the company's control.
- **Evidentiary Gaps:** Some human rights violations—such as harassment, discrimination, or forced labor—may lack direct documentation or reliable evidence, complicating and prolonging investigations and resolutions.
- **Voluntary Nature of Non-Judicial Remedies:** Non-judicial mechanisms under the Remedy Framework (e.g., internal grievance processes) are voluntary and non-binding for external stakeholders, which may limit participation compared to judicial or state-based mechanisms.
- **Scope of Control:** Solenis may have limited influence and leverage with business partners in its value and supply chains, which may limit its ability to deliver remedial actions beyond its immediate operations.

## Grievance Mechanisms

The Share Your Concern platform is accessible to all employees, business partners, and external stakeholders to report compliance concerns, potential breaches of our Global Standards of Business Conduct and supporting policies, Supplier Code of Conduct or potential legal violations. It supports Solenis' commitment to ethical conduct, integrity, and transparency by providing a secure, confidential, and multilingual reporting channel.

Key features include:

- Available 24/7 for internal and external users
- Confidential and anonymous reporting options
- Accessible via phone or web portal
- Multilingual support for global users
- Managed by an independent third party to ensure impartiality
- Allows for secure follow-up on submitted

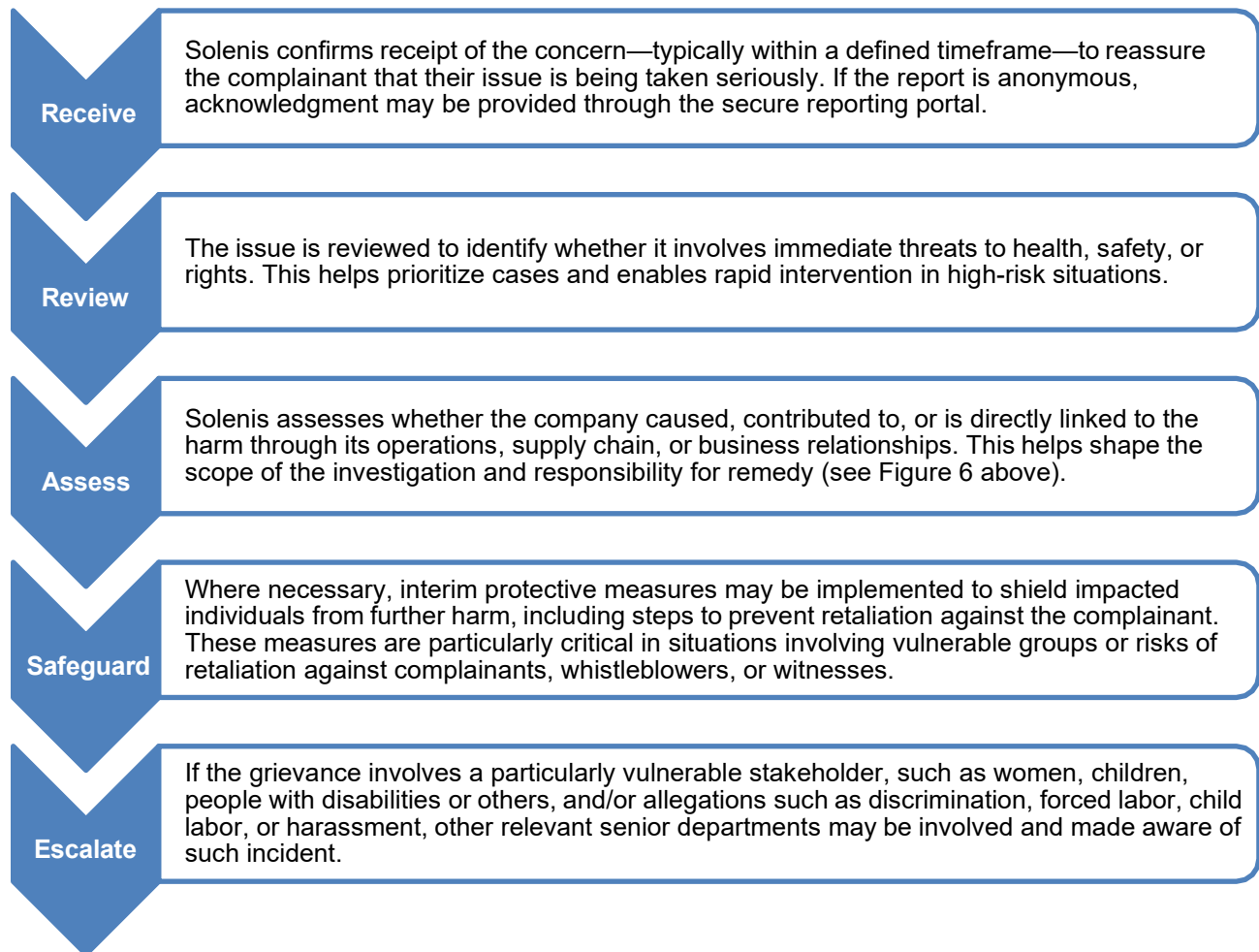
concerns

In addition to the global Share Your Concern platform, employees may raise concerns through their line managers, HR representatives, a dedicated email to connect with our CEO (Ask John), or directly with the Office of Ethics and Compliance (OEC) or Legal Department. External stakeholders may contact company representatives, community relations teams, or use the [Contact Us](#) page to raise concerns. The Solenis hotline (1-844-SOLENIS) is also available for confidential reporting and can be accessed by both internal and external users. All employees are required to complete the annual Solenis' annual certification process for compliance with the Global Standards of Business Conduct and to report any concerns during that process.

## Initial Response

Once a grievance is received through the Share Your Concern platform or any other official channel, Solenis undertakes an Initial Response to provide timely and responsible handling of the concern. This step lays the foundation for an effective and credible remediation process. Key actions in this stage include:

**Figure 10: Initial Response**

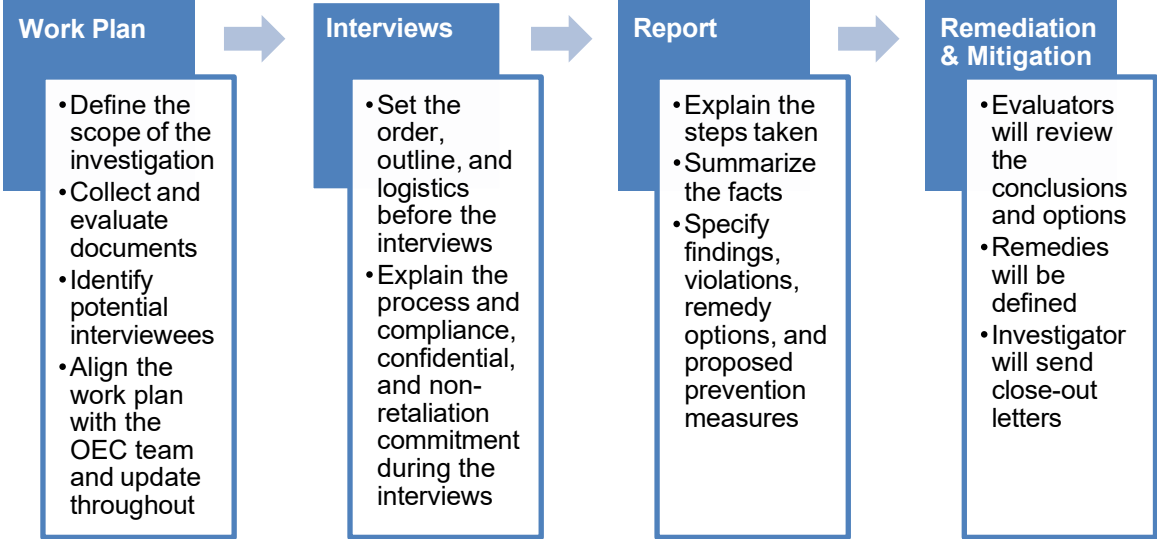


## Investigation and Verification

The [Investigations Policy](#) outlines our investigations process. The OEC conducts investigations directly or may delegate or collaborate with another department or external specialists. Each report received is classified

and assigned to the appropriate team to conduct an investigation with strict confidentiality. If the allegations are substantiated or any review of procedures or processes is applicable, the OEC and the Legal Department recommend and support the adoption of remediation and mitigation measures, including individual disciplinary actions or collective reviews. The **Internal Investigations Process** is an internal fact-finding process (Figure 11) designed to determine whether a violation of Solenis' policies or applicable laws has occurred.

**Figure 11: Internal Investigations Process**



For external investigations, as outlined in our Global Standards for Business Conduct, Solenis cooperates with reasonable requests from government agencies and authorities. Solenis is entitled to all of the safeguards provided by law to any person from whom information is requested or who is the subject of an investigation. Therefore, all requests for information beyond what is provided on a routine basis must be immediately reported to the Legal Department.

**Remediation Actions**

Following a substantiated grievance and thorough investigation, Solenis proceeds with remediation actions to address and resolve the harm identified. Remedies are designed to be fair, timely, and proportional to both the nature of the harm and Solenis' relationship to the harm.

Remedies include a range of responses such as financial or material compensation, formal apologies or restitution, disciplinary measures for responsible parties, reinstatement of affected workers, access to support services, or policy and process reforms to prevent recurrence. Throughout this stage, initial findings directly inform the scale and type of remedy implemented. Information on outcomes and remedies will be communicated to the extent permitted by confidentiality, privacy, and legal obligations. This provides a consistent, credible, and accountable pathway from grievance to resolution.

When a supplier is found to have violated the SCoC, Solenis expects cooperation in the investigation and might recommend and require the supplier to implement a corrective action plan addressing the root cause of the issue. Depending on the severity, Solenis provides guidance, training, or other support to help remediate and strengthen their compliance practices. Progress is monitored, and if violations are not adequately addressed, Solenis may suspend or terminate the business relationship.

Remediation measures Solenis implements by risk area include, but are not limited to, those shown in Figure 12:

**Figure 12: Remediation Examples by Risk Area**

<p><b>Human Trafficking and Forced Labor</b></p> <ul style="list-style-type: none"> <li>• Removal and/or reassignment of individuals, pending outcome of investigation</li> <li>• Termination of non-compliant vendors including contingent worker providers</li> <li>• Access to remedy for affected individuals e.g. relocation support</li> <li>• Financial remediation as appropriate</li> </ul>	<p><b>Child Labor</b></p> <ul style="list-style-type: none"> <li>• Transition underage worker away from unsanctioned tasks, reassignment as appropriate</li> <li>• Offer educational or social support where legally appropriate</li> <li>• Strengthen age verification during recruitment and onboarding</li> </ul>	<p><b>Freedom of Association &amp; Collective Bargaining</b></p> <ul style="list-style-type: none"> <li>• Reinstate or support affected employees when rights were suppressed, pending outcome of investigation</li> <li>• Translate and distribute materials on organizing rights</li> </ul>
<p><b>Discrimination</b></p> <ul style="list-style-type: none"> <li>• Take appropriate disciplinary action and/or make organizational adjustments following investigation</li> <li>• Adjust hiring, promotion, or pay decisions as appropriate where inequity is found</li> <li>• Retraining on anti-discrimination, anti-harassment, and unconscious bias policies</li> </ul>	<p><b>Working Conditions</b></p> <ul style="list-style-type: none"> <li>• Take appropriate disciplinary action and/or make organizational adjustments, following investigation</li> <li>• Provide medical care or compensation to impacted individuals</li> <li>• Perform mandatory site retraining and safety refreshers</li> </ul>	<p><b>Other</b></p> <ul style="list-style-type: none"> <li>• Notify affected parties of breaches as per Data Breach Notification Policy</li> <li>• Strengthen IT security and retrain staff</li> <li>• In case of company acquisition, conduct a thorough review of the target company's labor practices, safety protocols, policies, and procedures.</li> <li>• Provide practical and emergency aid</li> <li>• Provide relocation assistance or visa support as applicable</li> </ul>

## Remedy Design and Implementation Principles

Solenis seeks to embody the following principles when designing and implementing remedy responses:

- **Prioritization of Remedy Location:** Remedy efforts prioritize the following in order:
  - Sites of actual harm
  - Areas within or adjacent to the impact zone
  - Broader landscapes, areas, or regions where the impact occurred
- **Equivalence & Proportionality:** Remedies are proportionate to the scale and severity of the harm caused:
  - For impacts caused by Solenis, full remedy equivalent to the harm
  - For impacts contributed to or directly linked to Solenis, remedy proportional to ownership or leverage
- **Resource-Responsive Timeframes:** Remedy action planning considers the availability of financial and human resources, while remaining accountable to affected stakeholders and rightsholders.
- **Time-Bound Agreements with affected stakeholders:** Remedy activities must be developed through a

structured dialogue process and include specific, time-bound commitments.

- **Addressing Root Causes:** Beyond compensating for harm, Solenis aims to support efforts to address structural or systemic causes through process improvement, supplier engagement, and policy reform.

## Stakeholder Engagement

Solenis will consult affected stakeholders throughout the process, in line with the [Community Relations Policy](#) and relevant Community Relations Plans, including remedy design, satisfaction assessment, and feedback for improvement. Solenis has measures in place to maintain an active, respectful engagement with affected individuals or groups at every step of the remedy process. These measures include:

- **Remedy Selection:** Solenis begins by designing remedies with input with affected stakeholders, integrating their perspectives into both the type of remedy (e.g., financial, non-financial, systemic change) and the delivery mechanism selected. Engagement is tailored to participants’ needs respecting language, access, and power dynamics to seek inclusive and culturally appropriate involvement.
- **Ongoing Satisfaction Monitoring:** After implementation, Solenis assesses satisfaction of affected stakeholders with the process and the outcomes to confirm that remedies are effective and meet stakeholders’ expectations. Any emerging concerns are promptly identified and addressed.
- **Framework Revision and Continuous Improvement:** Stakeholder feedback is systematically captured and analyzed to identify lessons and areas for enhancement. Insights from case-level dialogue inform periodic updates to the Remedy Framework, reinforcing transparency and trust.
- **Documentation & Transparency:** Engagement activities, decisions, and outcomes are documented consistently, providing clear communication to stakeholders and enabling accountability.

Engagement with stakeholders on grievances and remedies may also informally occur at any stage of our stakeholder engagement process, as outlined in our latest [Sustainability Report](#) (Figure 13):

**Figure 13: Stakeholder Engagement**

Stakeholder group	How we engage
<b>Employees</b>	Town Halls; InSite and SharePoint; Leaders Speak; Virtual meetings; Health and Safety meetings and training; Training and development initiatives; EHS Impact meetings; Safety Toolbox meetings; Phone/email contact; EHS dashboard; Share Your Concern hotline; Employee surveys; Recognition awards; Job Safety Assessments; Behavior-Based Safety Observations
<b>Customers</b>	Product information; Product stewardship; Company website; Phone/email; Sales safety contact; Events and conferences; Product/technical bulletins; Emergency response calls; Customer satisfaction surveys; Customer awards
<b>Financial partners</b>	Company website; Phone/email contact; Quarterly financial statements; Quarterly earnings calls; Events and conferences
<b>Suppliers and contractors</b>	On-site orientations; Contractor procedure reviews; Contractor safety audits; Safety meetings and training; Supplier assessments and audits; Phone/email contact
<b>Communities</b>	Company website; Phone/email contact; Chambers of commerce; Solenis Gives platform; Community relations plan; Company site visits
<b>National and local regulators</b>	Engagement through industry associations; Permit applications; Regulatory inspections; Ongoing regulatory compliance monitoring; Phone/email contact; Written communications; Product and substance

## Respecting Rightsholder and Engagement Principles

Solenis seeks to embody the following principles when engaging and respecting stakeholders and rightsholders:

- **Do No Harm:** All human rights actions and remediation efforts must prioritize the safety, dignity, and well-being of rightsholders. Solenis is committed to preventing further harm or retaliation, including during investigations and remediation processes.
- **Consent:** Participation in remedy and grievance processes is voluntary and informed. Solenis equips rightsholders to understand the process and provide consent before engaging in remediation activities.
- **Privacy & Confidentiality:** Personal and sensitive information will be protected and anonymized in line with applicable legislation. Confidential grievance mechanisms (such as Share Your Concern) provide a safe channel for disclosure.
- **Empowerment:** Solenis is committed to supporting and building the capacity of rightsholders. Where appropriate and without compromising confidentiality or the privacy of others, Solenis seeks input from rights-holders on matters that directly affect them.
- **Prevention of Retaliation:** Proactive steps are taken to prevent retribution, intimidation, or discrimination against anyone raising a concern or participating in remedy processes.
- **Partnerships:** Effective remedies require collaboration. Solenis partners with civil society organizations, human rights experts, and service providers to design and implement solutions that are context sensitive.
- **Accountability & Transparency:** Clear and timely communication with rightsholders is critical. Remedy processes are predictable, follow agreed protocols, and provide guidance to affected individuals in a manner that respects confidentiality.

## Section 4

### Roles, Responsibilities and Resources

At Solenis, responsibility for human rights management is shared across several teams and governance bodies. Figure 14 outlines each of these entities and their respective roles in managing human rights issues, providing clear lines of accountability.

Effective implementation of the Plan requires strategic allocation of resources, including secure case management systems, translation services, stakeholder engagement tools, and funding for prevention and mitigation between multiple departments (e.g., Legal, Finance, Human Resources, Procurement). Technical expertise—such as social auditing, impact assessment, or culturally sensitive engagement—may also be necessary. Beyond case management, these teams are also responsible for proactive measures such as verifying worker age, ensuring fair and safe working conditions, requiring payment of living wages where applicable, and embedding broader human rights protections across operations and the supply chain.

**Figure 14: Roles and Responsibilities**

Team	Primary Role	Key Responsibilities
<b>Operating Council</b>	Directs Solenis’ business strategy and oversight	Sets sustainability priorities and monitors progress and provides final review of annual sustainability

		results.
<b>Leadership Team</b>	Leads strategic planning process	Reviews key initiatives supporting strategic goals. Reviews and updates operating plans. Reviews and approves corporate development efforts.
<b>Leadership Council</b>	Manages and leads Solenis' day-to-day business operations	Builds company commitment to sustainability culture, reviews and approves the sustainability strategy and goals, reviews and approves materiality matrix, and ensures that company is accountable for sustainability goals and progress.
<b>Sustainability Leadership Team</b>	Develops sustainability strategy and sets global ESG goals	Drives company culture and education on ESG, ensures ongoing data gathering and review, and provides regular updates to the above bodies.
<b>Humans Rights Cross-Functional Working Group</b>	This team of cross-functional leaders from Legal, HR, and Procurement works collaboratively to ensure that all aspects of human rights are upheld across our operations, policies, and business practices, helping to embed respect for human rights into every area of the organization.	Ensures the company's human rights approach aligns with global standards and best practices. Reviews applicable legislation, regulations, and market practices, and incorporates principles of the UN Global Compact and UN Sustainable Development Goals into policies and initiatives. Oversee the development and updating of internal policies, due diligence and assessment frameworks, and internal training programs. Leads active participation in the Human Rights Business Accelerator and Sustainable Procurement Roundtable through the UN Global Compact, embedding global best practices into operations. Ensure procurement processes are managed responsibly via platforms such as Coupa and Interos.
<b>Legal Team and Office of Ethics and Compliance</b>	Provides legal and regulatory guidance	Advises on legal risks, cross-border issues, and rights-compatible approaches. Provides support with applicable laws and international standards. Manages the Share Your Concern platform. Conducts or oversees investigations. Ensures process integrity and alignment with the Code of Conduct and ethical standards.
<b>Office of Data Privacy</b>	Protecting sensitive information	Provides compliance with data privacy regulations, managing data breach responses, and conducting regular privacy assessments to safeguard personal and organizational data.
<b>Human Resources (HR)</b>	Leads in employee-related cases	Responds to workforce and employee-related issues involving harassment, discrimination, or retaliation. Implements corrective actions and promotes respectful workplace practices aligned with human rights principles, such as age verification, fair wages, and decent working conditions. Responsible for creating and implementing policies and training materials, reviewing employment-related processes, ensuring non-discrimination, equal opportunity, and safe work environments.
<b>Site &amp; Operational Management</b>	Acts as frontline for issue identification and implementation	Implements local prevention and mitigation actions; identifies and escalates concerns early; cooperates with investigations; and engages directly with workers, contractors, and community stakeholders.
<b>Health &amp; Safety</b>	Providing a safe working environment	Addresses health and safety concerns, conducts regular safety audits, reviews health and safety

		processes and procedures, promotes health and safety awareness, and provides compliance with occupational health and safety regulations.
<b>Supply Chain &amp; Procurement</b>	Requires supplier compliance and exercises leverage	Conducts supplier due diligence; enforces corrective action plans; escalates when suppliers are non-cooperative; and supports capacity-building.

## Section 5

### Monitoring and Evaluation

Solenis integrates regular monitoring and review processes into our internal operations and supply chain to ensure alignment with our Human Rights commitments. Monitoring assessments are conducted at least yearly for activities within scope as outlined in the Internal Operations Human Rights Risk Assessment and Supplier Risk Assessment Protocol. Other assessments may be conducted more frequently and whenever needed due to changes in business activities, regulatory developments, or identified risks. These reviews help us proactively identify and manage potential human rights impacts across our operations and supply chain.

### Key Performance Indicators

Human rights management will be monitored and tracked using key performance indicators (KPIs); Figure 15), aligned with Solenis' sustainability and reporting standards, particularly the GRI Standards. Remediation cases will be monitored and tracked separately using KPIs (Figure 16).

**Figure 15: Human Rights KPIs**

Issue	KPI	GRI Alignment
<b>Diversity and Equal Opportunity</b>	Diversity of governance bodies and employees	405-1
	Ratio of basic salary and remuneration of women to men	405-2
<b>Non-discrimination</b>	Incidents of discrimination and corrective actions taken	406-1
<b>Freedom of Association and Collective Bargaining</b>	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	407-1
<b>Child Labor</b>	Operations and suppliers at significant risk for incidents of child labor	408-1
<b>Forced or Compulsory Labor</b>	Operations and suppliers at significant risk for incidents of forced or compulsory labor	409-1
<b>Security Practices</b>	Security personnel trained in human rights policies or procedures	410-1
<b>Rights of Indigenous Peoples</b>	Incidents of violations involving rights of indigenous peoples	411-1
<b>Human Rights Assessment</b>	Operations that have been subject to human rights reviews or impact assessments	412-1
	Employee training on human rights policies or procedures	412-2
	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	412-3
<b>Local Communities</b>	Operations with local community engagement, impact assessments, and development programs	413-1
	Operations with significant actual and potential negative impacts on local communities	413-2
<b>Supplier Social Assessment</b>	New suppliers that were screened using social criteria	414-1
	Negative social impacts in the supply chain and actions	414-2

	taken	
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**Figure 16: Remediation KPIs**

KPI	Description	GRI / UNGP Alignment
<b>Number of human rights-related grievances received</b>	Total number of cases reported through grievance mechanisms (e.g., Share Your Concern)	GRI 2-25, 2-26, 406, 412-1 UNGP Principle 29
<b>% of sites or suppliers with access to grievance mechanisms</b>	Proportion of operations and key suppliers covered by the formal grievance/remediation process	GRI 408, 409, 412 UNGP Principle 29

## Evaluation Criteria

Solenis will regularly evaluate the overall effectiveness of the Plan based on criteria aligned with the [UN Guiding Principles Reporting Framework](#) (Figure 17). We will identify and implement opportunities for continuous improvement and integrate lessons learned across business functions.

**Figure 17: Human Rights Management Evaluation Criteria**

Topic	Criteria
<b>Governance of Respect for Human Rights</b>	
<b>Policy Commitment</b>	How has the public commitment been developed?
	Whose human rights does the public commitment address?
	How is the public commitment disseminated?
<b>Embedding Respect for Human Rights</b>	How is day-to-day responsibility for human rights performance organized within the company, and why?
	What kinds of human rights issues are discussed by senior management and by the Board, and why?
	How are employees and contract workers made aware of the ways in which respect for human rights should inform their decisions and actions?
	How does the company make clear in its business relationships the importance it places on respect for human rights?
	What lessons has the company learned during the reporting period about achieving respect for human rights, and what has changed as a result?
<b>Defining the Focus of Reporting</b>	
<b>Statement of salient issues</b>	State the salient human rights issues associated with the company's activities and business relationships during the reporting period.
<b>Determination of salient issues</b>	Describe how the salient human rights issues were determined, including any input from stakeholders.
<b>Choice of focal geographies</b>	If reporting on the salient human rights issues focuses on particular geographies, explain how that choice was made.
<b>Additional severe impacts</b>	Identify any severe impacts on human rights that occurred or were still being addressed during the reporting period, but which fall outside of the salient human rights issues, and explain how they have been addressed.
<b>Management of Salient Human Rights Issues</b>	
<b>Specific Policies</b>	How does the company make clear the relevance and significance of such policies to those who need to implement them?
<b>Stakeholder Engagement</b>	How does the company identify which stakeholders to engage with in relation to each salient issue, and when and how to do so?
	During the reporting period, which stakeholders have the company engaged with regarding each salient issue, and why?

	During the reporting period, how have the views of stakeholders influenced the company's understanding of each salient issue and/or its approach to addressing it?
<b>Assessing Impacts</b>	During the reporting period, were there any notable trends or patterns in impacts related to a salient issue and, if so, what were they?
	During the reporting period, did any severe impacts occur that were related to a salient issue and, if so, what were they?
<b>Integrating Findings and Taking Actions</b>	How are those parts of the company whose decisions and actions can affect the management of salient issues, involved in finding and implementing solutions?
	When tensions arise between the prevention or mitigation of impacts related to a salient issue and other business objectives, how are these tensions addressed?
	During the reporting period, what action has the company taken to prevent or mitigate potential impacts related to each salient issue?
<b>Tracking Performance</b>	What specific examples from the reporting period illustrate whether each salient issue is being managed effectively?
<b>Remediation</b>	Through what means can the company receive complaints or concerns related to each salient issue?
	How does the company know if people feel able and empowered to raise complaints or concerns?
	How does the company process complaints and assess the effectiveness of outcomes?
	During the reporting period, what were the trends and patterns in complaints or concerns and their outcomes regarding each salient issue, and what lessons has the company learned?
	During the reporting period, did the company provide or enable remedy for any actual impacts related to a salient issue, and what are examples?

In addition to the evaluation criteria above, Solenis will annually evaluate the overall effectiveness of the Remedy Framework, based on the principles outlined in Figure 18 below. We will identify and implement opportunities for continuous improvement, and integrate lessons learnt into how we do business.

**Figure 18: Remedy Framework Evaluation Criteria**

Operating Principle	Assessment Questions	Evidence to Look For	Key Performance Indicators (KPIs)
<b>Legitimate</b>	Are governance structures in place to ensure impartial oversight and accountability?	Documentation of roles, oversight committees, escalation protocols	Presence of oversight committee % of cases reviewed independently
<b>Accessible</b>	Are grievance mechanisms known, easy to use, and accessible to all stakeholders (employees, contractors, suppliers, communities)?	Training records, outreach materials, translated resources, anonymous channels	% of stakeholders aware of the mechanism # of languages supported # of grievances received from vulnerable groups
<b>Predictable</b>	Is there a clear, communicated process with defined timelines and expectations for each stage of the remedy process?	Visual workflows, policies, internal operating procedures, stakeholder communications	% of cases resolved within established timelines Clarity score in stakeholder surveys
<b>Equitable</b>	Do all parties have fair access to information,	Availability of interpreters, guidance	# of interpreters/ support provided

	advice, and support throughout the process?	documents, support personnel	% of participants reporting fairness
<b>Transparent</b>	Are processes and outcomes communicated transparently while maintaining confidentiality where needed?	Internal and external reporting, redacted summaries, stakeholder feedback	% of cases reported publicly in aggregate Stakeholder satisfaction with transparency
<b>Rights-Compatible</b>	Do outcomes align with internationally recognized human rights standards (e.g., proportionality, dignity, fairness)?	Remedy decisions, legal reviews, recourse to alternative mechanisms	% of remedies reviewed against UNGPs # of deviations noted
<b>Based on Engagement</b>	Are affected stakeholders meaningfully engaged in the design, implementation, and review of remedy processes?	Records of consultation, satisfaction surveys, grievance closure reports	# of stakeholder consultations satisfaction ratings % of input reflected in decisions
<b>Continuous Improvement</b>	Is there a feedback loop to assess the effectiveness of the framework and adapt based on learnings?	Lessons learned reports, revision logs, stakeholder feedback incorporated	# of framework updates # of lessons learned implemented
<b>Non-Retaliation</b>	Are measures in place to ensure that complainants and witnesses are not retaliated against?	Anti-retaliation measures, disciplinary action logs, whistleblower protections	# of retaliation cases reported/investigated Existence of non-retaliation training
<b>Confidentiality &amp; Privacy</b>	Are sensitive data and identities protected throughout the remedy process?	Data privacy protocols, case file access restrictions, informed consent forms	# of privacy breaches % of staff trained on data confidentiality

## Section 6

### Communication Protocols

#### Internal Communication

The Plan will be communicated through clear, accessible, and culturally appropriate messaging across our global operations. Communications will emphasize Solenis' zero-tolerance approach to human rights violations, introduce the Share Your Concern platform, and reinforce the roles and responsibilities of all employees in identifying and reporting concerns (Section 4).

It will be delivered through existing employee communication and training programs, including:

- **Annual Training and Communication Plan:** This outlines mandatory annual training requirements for all employees globally on key compliance areas, including the key topics covered under our Global Standards of Business Conduct. Employees are required to review and certify their compliance annually. The OEC follows up on outstanding certifications and continuously seeks process improvements.
- **Procurement Learning Journey:** This platform defines the skills and knowledge expected of our Global Procurement team, including training on sustainability and supplier risk management. Annual human rights training is mandatory for procurement staff. Additional tailored training is provided for other teams based on risk assessments and operational needs.

Solenis maintains thorough record-keeping practices as directed by the Legal Department and outlined in our Global Standards of Business Conduct and **Records Management Policy**. Completed training and employee certifications are recorded annually as part of our compliance program. Our Supplier Code of Conduct requires our suppliers to accurately report and record relevant business activities, performance, and disciplinary actions.

## External Communication

Solenis is committed to transparent, consistent, and accessible communication with external stakeholders regarding its human rights management processes. We annually disclose performance data concerning our governance, risk management, due diligence, and compliance initiatives pertaining to human rights in our externally assured [Annual Sustainability Report](#), which includes a dedicated ESG Data Table and GRI Content Index.

## Review and Updates

The Plan will be reviewed at least every three years by the Sustainability Leadership Team. It will also be incorporated within our broader review cycle to ensure consistency, alignment, and efficiency. Review may also be required whenever there is a significant change in the business or operating context. These changes may stem from substantial stakeholder feedback, significant findings from internal or third-party evaluations, performance and reporting trends, changes in international human rights standards, or updates in local and global legal and regulatory requirements.

The review will assess whether the Plan remains fit for purpose and whether management approaches remain effective. Lessons learned from human rights impacts and risks prevention and mitigation measures, stakeholder engagement, and external developments will feed into updates to improve management approaches and long-term impact. Material revisions will be communicated internally and externally as part of Solenis' commitment to continuous improvement and responsible business conduct.

# Appendix

## Key policies and commitments

This appendix contains the core policies, standards, and governance documents that together form the foundation of Solenis' Human Rights Management Plan. Each policy supports a specific component of our overarching human rights due-diligence framework—from risk identification and responsible sourcing to ethical conduct, reporting, and remediation. These documents work in concert to guide our actions, align with global expectations, and ensure that our human rights commitments are embedded throughout operations and across our value chain.

All policies listed below are publicly available at [solenis.com](https://www.solenis.com), unless otherwise noted.

**1. Human Rights Policy**

Defines Solenis' foundational commitment to respecting internationally recognized human rights and outlines the principles that guide our actions across all operations, employees, contractors, and business partners.

**2. Global Standards of Business Conduct**

Establishes expectations for ethical behavior for all employees and partners, covering topics such as anti-corruption, fair treatment, responsible decision-making, and integrity in business practices.

**3. Internal Operations Human Rights Risk Assessment**

A structured assessment tool used to identify, evaluate, and address potential human rights risks within Solenis' global operations, including workforce impacts, facility risks, and community considerations.

**4. Due Diligence Protocol**

Outlines the processes used to assess, prevent, mitigate, and monitor human rights risks across Solenis' operations and supply chain in line with global due-diligence standards.

**5. Supplier Code of Conduct**

Defines human rights, labor, environmental, and ethical expectations for suppliers, contractors, and business partners. This policy ensures that human rights standards extend throughout our supply chain.

**6. Solenis Risk Assessment and Management Protocol**

Provides a standardized methodology for identifying, categorizing, and mitigating ESG-related risks—including those tied to human rights—across operations and supplier relationships.

**7. Global Procurement and Responsible Sourcing Policy**

Details Solenis' commitment to responsible sourcing practices, supplier engagement, and procurement governance that supports ethical, sustainable, and socially responsible business practices.

**8. Conflict Minerals Policy**

Communicates Solenis' approach to preventing the use of conflict minerals in our products and promotes transparency, ethical sourcing, and adherence to relevant regulatory frameworks.

**9. Responsible Care Policy**

Affirms Solenis' commitment to health, safety, environmental stewardship, and sustainability through the globally recognized Responsible Care® program. Supports human rights by promoting safe working conditions and environmental protection.

**10. Responsible Care Signed Charter**

Demonstrates executive-level endorsement of Responsible Care principles and reinforces leadership accountability for maintaining high standards in safety, sustainability, and human rights protections.

**11. Investigations**

Outlines how Solenis investigates allegations of human rights violations, misconduct, or ethical concerns. Includes expectations for timeliness, fairness, confidentiality, and corrective actions.

**12. Reporting**

Provides channels for employees, contractors, and stakeholders to report concerns—including anonymously—about potential human rights, ethical, or compliance issues. Reinforces Solenis' non-retaliation commitment and respect for due process.

**13. Antiharassment**

Outlines Solenis' commitment to maintaining a respectful, inclusive, and harassment-free workplace. The policy defines unacceptable behaviors, establishes expectations for employee conduct, and provides clear channels for employees and contractors to report concerns anonymously. It also reinforces the company's non-retaliation commitment and ensures that all reports are handled with fairness and due process.

**14. Modern Slavery Joint Report**

Provides a comprehensive overview of Solenis' approach to identifying, preventing, and mitigating modern slavery, forced labor, child labor, and broader human rights risks across its global operations and supply chain. The report outlines governance structures, risk assessment and due diligence processes, supplier engagement, and remediation frameworks, while highlighting progress made in strengthening human rights management and alignment with international standards.

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## SOLENIS POLICY

### Human Rights

#### 1.0 Policy

Solenis is committed to achieving the highest standards of professionalism and ethical conduct in its operations, and expects all employees and third parties across our value chain to carry out their business according to these standards, in line with Solenis' [Global Standards of Business Conduct](#) and in compliance with all applicable laws.

The purpose of this policy is to articulate our commitment to respect the internationally recognized human rights of our own workforce, workers in our value chain, affected communities, consumers and end-users.

#### 2.0 Human rights

Solenis respects internationally recognized human rights set out in the [Universal Declaration of Human Rights](#) ("UDHR"), 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](#).

We are committed to implementing the UN Guiding Principles on Business and Human Rights (UNGPs), the OECD Guidelines for Multinational Enterprises, and the UN Global Compact's Ten Principles, and to support relevant United Nations Sustainable Development Goals which are material to our business and where we can make a meaningful impact.

Solenis' operations are subject to double materiality assessments (DMA), where both financial and non-financial risks, including potential impacts of our business on stakeholders and rightsholders, are considered to identify the material topics and inform our human rights initiatives. As a result, we have identified the following salient human rights topics:

#### 2.1 Non-discrimination

Solenis respects each individual's human rights and does not discriminate on the basis of race, color, religion, creed, political opinions, sex, age, social status, veteran status, marital or partnership status, family origin, physical or mental disability, sexual orientation, gender identity or expression, or any other status protected by applicable law. Any exclusions or preferences in the work environment made on these bases and resulting in any form of inequality, are prohibited. No form of discrimination will be tolerated.

## **2.2 Workplace environment and equal opportunity**

Solenis provides a workplace environment that is safe, respectful to and inclusive of all individuals and that is free from harassment, bullying and offensive and disrespectful conduct. Solenis requires that individuals are treated fairly and equally in all employment-related decisions. Our commitment to diversity, equity and inclusion is incorporated into Solenis' Cultural Beliefs, which provide the foundation for our business.

## **2.3 Health and safety**

Solenis operates globally in a safe and responsible manner, respecting the health of its employees, customers, suppliers, contractors and the communities in which the company operates. Solenis provides a safe and healthy workplace, and complies with applicable safety and health laws, regulations and internal requirements, as reflected in the company's [Responsible Care](#)<sup>\*</sup> policy. Solenis believes that all injuries and occupational hazards are preventable, and the company's goal for all of them is zero.

## **2.4 Forced labor, human trafficking and working time**

Solenis prohibits the use of all forms of forced labor, including indentured labor, bonded labor, military labor, slave labor and any form of human trafficking. Solenis' working time practices comply with all relevant national and local laws and applicable collective bargaining agreements.

## **2.5 Children and young workers**

Solenis maintains a zero tolerance approach to violence, exploitation, or abuse of children, prohibits the use of all forms of child labor, and conforms with the ILO conventions for minimum age and worst forms of child labor. Solenis does not employ any person under the age of 15, and complies with all local laws and regulations related to hiring children and young persons. Solenis does not employ young persons (under the age of 18) at night or for hazardous work. The company also supports educational, training, internship and apprenticeship programs for young people.

## **2.6 Vulnerable Groups**

Solenis will pay particular attention to vulnerable or marginalized groups in the contexts in which we operate, such as children, women, Indigenous Peoples, and migrant workers, and seek to prevent or mitigate any disproportionate impacts that our activities may have on them.

## **2.7 Compensation**

Solenis compensates employees equitably and competitively relative to the industry and local labor market. Solenis' compensation philosophy is communicated to employees and the company operates in compliance with applicable wage, work hours, overtime and benefits laws, and applicable collective bargaining agreements.

## 2.7 Freedom of association

Solenis respects employees' right to join or to form a labor union without fear of reprisal or harassment. Where employees are represented by a legally recognized union, the company is committed to respecting the right to collective bargaining, establishing a constructive dialogue with their freely chosen representatives, and negotiate in good faith.

## 2.8 Data privacy

We are committed to protecting the personal information of all individuals, to leveraging data as an enterprise asset and mitigating risk of data breach, data losses or misuse. It is the policy of Solenis to comply with all applicable data privacy laws to which the company is subject in the countries where it does business, and is committed to collect, process and transfer personal data responsibly and in accordance with the principles and obligations set forth in Solenis' [Data Protection](#) policies, unless such policies conflict with stricter requirements of local laws.

## 2.9 Clean Environment

Solenis commits to compliance with all applicable environmental regulations where we manufacture, sell, or distribute products. Our facilities are operated to reduce our impacts and improve our overall environmental performance. A key focus is the reduction of environmental incidents that may arise from chemical releases, including climate change and energy management, water management, protection of biodiversity and ecosystems, and waste management. We respect the right to a clean, healthy and sustainable environment, and the right to safe and clean drinking water and sanitation.

## 2.10 Communities

Solenis respects the human rights of the communities in which we operate and seeks to make a positive impact through responsible business practices. We engage with local communities in a manner that promotes social, economic, and environmental well-being, while respecting cultural norms and human rights. Solenis encourages initiatives that support education, health, safety, and sustainable development, and seeks to prevent or mitigate any negative impacts of our operations on vulnerable or marginalized groups.

## 2.11 Access to Grievance and Remedy

Solenis is committed to providing access to effective grievance mechanisms for our own workforce, suppliers and workers in our value chain, affected communities, consumers and end-users, partners and other stakeholders and rightsholders, in line with the UNGPs. Where we have caused or contributed to adverse human rights impacts, we will provide for or cooperate in remediation.

## 3.0 Implementation

Solenis undertakes due diligence to proactively identify, prevent, mitigate and account for potential and actual adverse human rights impacts we may cause or contribute to through our



own activities or through our business relationships. We will also use our leverage to prevent or mitigate adverse human rights impacts we may be directly linked to across our value chain, in line with the UNGPs and OECD Due Diligence Guidance for Responsible Business Conduct.

We embed human rights into our management systems, including our risk and impact assessments, grievance mechanisms and incident responses, stakeholder engagement and workforce capacity building, supplier and business partner engagement, and governance and reporting arrangements.

Solenis, as a global company, recognizes that respecting and supporting human rights presents unique challenges in different parts of the world. We comply with all applicable laws wherever we operate.

In addition to our employees and contractors, we expect our suppliers and business partners across our value chain to adopt the principles of this policy and share these commitments and conduct human rights due diligence, as outlined in our [Supplier Code of Conduct](#), Procurement Sourcing Policy and Supplier Risk Assessment Protocol.

#### **4.0 Other relevant policies**

- [Anti-harassment](#)
- [Community Relations](#)
- [Conflict Minerals](#)
- [Internal Operations Human Rights Risk Assessment](#)
- [Hiring Due Diligence Protocol](#)
- [Labor Practices Commitment](#)
- [Procurement Sourcing Policy](#)
- [Supplier Code of Conduct](#)
- [Supplier Risk Assessment Protocol](#)

#### **5.0 Reporting**

Any instances of non-compliance with this policy should be reported in accordance with Solenis' [Reporting](#) policy. Any concerns should be reported to management, the Human Resources Department, the Legal Department, the Office of Ethics and Compliance, or through the Share Your Concern Portal, available on Solenis' intranet page and website. Concerns can be raised confidentially and anonymously if desired.

#### **6.0 No retaliation**

Pursuant to the [Reporting](#) policy and the [Investigations](#) policy, Solenis prohibits any form of discipline, reprisal, intimidation or retaliation for reporting an actual, potential or perceived violation, or for cooperating in a compliance-related inquiry.



## 7.0 Scope

This applies to all Solenis employees and contractors across all company-managed businesses, subsidiaries, and joint ventures, across all jurisdictions where we operate.

Solenis extends this commitment to our partners, which include suppliers, agents, other intermediaries, consortia partners, customers, clients, and local communities. We expect our partners to uphold principles consistent with this Human Rights policy.

## 8.0 Owner

Chief Sustainability Officer

## 9.0 Exceptions

There are no exceptions to this policy.

## Revision history

This is a history of notable changes to this policy.

Effective date	Section	Description of change
September 12, 2025	2.0, 3.0, 4.0, 5.0, 7.0 and 8.0	Included: double materiality assessment and topics. Reviewed: definitions, implementation information, reporting channels, scope, related policies and owner



# Global Standards of Business Conduct

*Last updated: January 2023*

## Global Standards of Business Conduct

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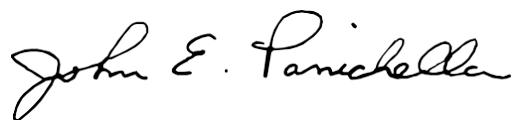
## Message from our CEO, John Panichella

As we continue to progress in our journey, one fundamental aspect of Solenis will never change: we must always maintain the highest standard for business responsibilities and ethics. We are passionate about growing our company and building our culture based on a core-value foundation of respect, integrity and accountability. The cornerstone of this foundation is our Global Standards of Business Conduct, also referred to as the Code. Success at Solenis depends on our steadfast focus on our Deliberate Ethics<sup>SM</sup> Culture. Deliberate Ethics is a mind-set of being intentional about driving and maintaining a high-performance culture while staying true to our core values through our actions and words and keeping the Code top-of-mind. This is the responsibility of every Solenis employee, officer and director, worldwide.

Our Code is a how-to guide for doing business globally at Solenis. Embrace the Code in both letter and spirit! Where the letter of guidance is not specific, the spirit must prevail. Thank you for following the Code, living our core values, and helping to keep Solenis a well-respected and ethical citizen in the global marketplace.



Regards,

A handwritten signature in black ink that reads "John E. Panichella". The signature is written in a cursive, flowing style.

John Panichella  
CEO

## Overview

*“The Solenis brand is valued and respected globally not just for the products and equipment we make, the solutions we generate and the value we create, but also for how we conduct business and operate in the marketplace. How we do what we do matters to our colleagues, customers, investors, business partners and communities. The value-proposition for consistently operating through our Deliberate Ethics lens has never been clearer.”*

**– Royce Warrick, Senior Vice President, General Counsel**

As a global company, we recognize the challenges of operating around the world. While observing the many laws that have international application, we are also mindful of observing diverse local customs and the laws of the countries in which we operate. If compliance with the Code or other corporate policies or procedures appears to conflict with international or local laws or regulations, employees should discuss their concerns with the Legal Department or the Office of Ethics and Compliance.

All Solenis employees, directors and officers, wherever located, are expected to comply with the Code. Any business partners, including any agents, contractors, distributors, consultants or other third-party representatives, acting on behalf of Solenis in any country, should be provided with a copy of the Code and are expected to comply with these requirements. Specific policies and procedures support and supplement the Code and govern appropriate business behavior. Our policies are available on [solenis.com](http://solenis.com) and the company intranet.

Any exceptions to the provisions contained in the Code or any related policy require advance approval by the Legal Department or the Office of Ethics and Compliance.

If you have questions or need interpretation of a specific law, regulation or policy, please contact the Legal Department or the Office of Ethics and Compliance.

### **Your Responsibility and Accountability**

We face challenges and difficult decisions every day. Each of us is responsible for making good decisions so that as a company, we live up to our commitment to act in accordance with our core values of respect, integrity and accountability. We all are expected to understand and comply with the provisions of the Code, our policies and procedures and the law and to always conduct company business with the highest legal and ethical standards.

Violations of the Code, any company policy or any applicable law are expressly prohibited and are always contrary to our best interest. If you commit a violation, you and, in some cases, the company may face serious consequences. Personal consequences may include disciplinary action, employment termination and damage claims. Furthermore, some violations may also give rise to criminal prosecution of the employees involved, the company and/or officers and directors of the company.

If you receive information or have reason to believe that our company, another employee or any person acting on our behalf, has violated or is violating the Code, any company policy or the

law, you must promptly report it via the Share Your Concern page on the company's intranet or by contacting the Human Resources Department, the Legal Department, the Office of Ethics and Compliance or your manager. Specific laws, regulations, policies and procedures in your country may contain additional reporting requirements or limitations that must be followed.

You may report any suspected violations in confidence and without fear of retaliation. We will not tolerate any reprisal, harassment or retaliation against anyone who, in good faith, reports a known or suspected violation. The company will investigate occurrences of possible retaliation and discipline employees who have retaliated against someone who has reported possible misconduct. For more information, please visit the Share Your Concern page on the company's intranet site.

All employees are required to cooperate fully in company investigations and to maintain the utmost confidentiality to preserve the integrity of investigations. Failure to cooperate or providing false or misleading information during an investigation may lead to disciplinary action up to and including suspension, termination, or both.

### **Compliance Program**

The Code is the foundation of our comprehensive, worldwide compliance program, underscoring our commitment to our core values, the law and high ethical standards. The program requires training and education for employees, completion of compliance assessments and audits, and driving personal accountability through communication and awareness initiatives. The Office of Ethics and Compliance and senior executives provide oversight and direction for the program.

### **Annual Certification of Compliance with the Code**

Annually, all Solenis employees are required to review the Code, certify compliance with its provisions and supporting policies, and as part of the same process, report any known or suspected Code or policy violations and conflict of interest situations. We will follow up on and investigate, as needed, any issues reported during the certification process.

### **Responsible Care\*\* Framework**

Solenis employees strive for excellence in global environmental, health, safety and security performance. Our Responsible Care framework reflects this focus and is an integral part of our values and operating principles. We integrate environmental, health, safety and security activities and awareness into business planning and operating practices, while establishing accountability at all levels of the organization. Everyone is expected to act with integrity and honesty to create and maintain safe work environments, to protect human health and to comply with the law.

### **Making Good Decisions**

Although the Code highlights the key principles that guide our behavior, it cannot address every situation. If a situation arises that is not addressed in the Code or where the right action to take or how to do it is not clear, consider these basic questions before you act:

- Is it legal?
- Is it consistent with the Code?
- Does it follow our policies?
- Would my actions tarnish the company's or my reputation?
- Would I be embarrassed if my actions became public or appeared on the Internet?

- Am I willing to be held accountable for my actions?
- Did I include all the right people when making the decision?

If you are still unclear about what to do, seek guidance from the Legal Department, the Office of Ethics and Compliance, the Human Resources Department, your manager, or ask a question via the company's Share Your Concern intranet page.

## Responsibility to Each Other

We believe in treating people, including third parties, with dignity and respect. As employees, we are expected to hold ourselves accountable, at all times, to high professional standards with integrity and mutual respect being the basis of all professional relationships.

### Human Rights

As a multinational organization, Solenis has been purposeful in fostering a culture of respecting human rights across our operations, supply chain and activities related to our business. We monitor and evaluate our activities, provide evidence and actively engage with third-party stakeholders who acknowledge our commitment. Solenis follows the norms and principles in the Universal Declaration of Human Rights and other major multinational agreements and strives to embed human rights through a variety of measures, including training, communication campaigns and open dialogue. We have reporting mechanisms in place to make sure we hear concerns. Where human rights violations are identified, we implement appropriate remediation.

### Respect for Others

All employment applicants and current employees are judged by their qualifications, demonstrated skills and achievements without regard to age, disability, gender, genetic characteristic, national origin, race, color, religion, sexual orientation, veteran status, trade union membership or any other personal characteristics that are protected by law. We are committed to maintaining a professional and safe work environment free from violence, intimidation, discrimination and harassment.

### Diversity, Equity and Inclusion

Solenis conducts business in more than 120 countries, and our employee base, comprised of a diverse array of nationalities working in more than 40 countries, reflects the different cultures and markets in which we operate. We value diversity, equity and inclusion as a competitive advantage, and believe the diversity of our employees working in an inclusive and equitable environment allows us to be more creative, agile and effective in delivering innovative technologies and solutions to customers and enhancing value to Solenis. We are committed to building a workforce of employees with different backgrounds, identities, experiences and perspectives and to fostering a work culture that embraces, embodies, celebrates and makes the most of those differences.

### Harassment Prevention

Solenis is committed to maintaining a work environment free from harassment or unprofessional behavior, where people are treated with respect and dignity. Harassment of any form is prohibited, whether the harassment is experienced or committed by an employee, customer, supplier, vendor, contractor or visitor.

Harassment is unwelcome conduct, whether verbal, nonverbal or physical, that is based on a person's actual or perceived age, disability, gender, genetic characteristic, national origin, race,

color, religion, sexual orientation, veteran status or other protected group status. It includes unwelcome sexual advances, requests for sexual favors and other unwelcome or abusive verbal or physical conduct. Employees are encouraged to help each other by speaking up when another individual's conduct makes them uncomfortable and are expected to immediately report any behavior they believe is inconsistent with the Code or our policies.

### **Environment, Health and Safety**

As part of our commitment to the Responsible Care framework and to continuous improvement in our performance, we are committed to providing a safe and secure workplace for our employees and the communities in which we operate. To that end, each of us must live a culture in which negative environmental, health, safety and security incidents are discouraged and prevented. We are committed to and believe in a zero-incident safety culture. A zero-incident culture does not just happen. It occurs as a positive result of behaviors and a mind-set that actively seeks a world-class safety standard. Our employees take responsibility for their actions because they are empowered to make informed decisions. Success depends on genuine commitment, basic operating principles, well-communicated visions, and most importantly, a business atmosphere where all employees care for each other.

Safety is approached proactively. Positive safety behaviors, as well as potential risks and hazards, are identified. Coaching or being coached for safety is accepted without fear of retribution. If an incident does occur, follow-up on the event is recognized as being important for determining the root cause so that preventive actions can be taken to minimize the potential for that or a similar incident to happen again. In this environment, a zero-incident culture is the norm.

Everyone is responsible for observing the rules and practices that relate to on-the-job health and safety. This includes immediately reporting incidents, injuries and unsafe practices or conditions and taking appropriate and timely action to correct known unsafe conditions.

### **Substance Abuse**

The health and safety of all employees, and the quality and productivity demanded by customers and consumers, require us to report to work free from the influence of any substance that could prevent us from conducting work activities safely and effectively. The unauthorized use, possession or distribution of drugs or alcohol while on company business or at any business workplace is prohibited.

Anyone who suffers from a substance abuse problem is urged to seek assistance by contacting the Human Resources Department or the company's Employee Assistance Program.

Records associated with substance abuse counseling and the Employee Assistance Program are kept confidential, except to the extent disclosure is required by our policy, applicable law or to protect the life or safety of others. Enrollment in a treatment program will not excuse you from the consequences of a violation of the Code or company policy.

### **Safety and Security**

For our safety and security, the possession of firearms and other weapons is prohibited on all of our premises or while engaged in company business unless written approval is obtained in advance from Solenis' General Counsel.

Solenis strictly prohibits bullying, violence or the threat of such action in the workplace. If you or someone else in the workplace is being threatened with or subjected to such behavior, immediately contact the Human Resources Department, the Legal Department, the Office of Ethics and Compliance or reach out via the company's Share Your Concern intranet page.

Where permitted by law, the vehicles and personal possessions (such as handbags, lunch boxes, baggage, parcels and computers) of employees and other people entering any Solenis workplace are subject to inspection. Solenis also reserves the right to inspect all employee work areas (such as desks, cabinets, files and lockers). In addition, Solenis may conduct a full background investigation of each prospective employee prior to or during employment and may require drug screening as a condition of employment or continued employment.

We operate in locations that may restrict or prohibit background investigations, drug screenings and inspection of personal items. We will abide by any such applicable laws.

## Responsibility to Solenis

It is important for all employees to embrace our collective responsibility to uphold the values expressed in the Code, follow the appropriate guidelines, conduct business and interact with each other in a way that helps preserve the value of our business and safeguard the company's assets, and never hesitate to Share Your Concern or speak-up.

### Business Records

Employees who create or maintain reports, records or any other information are responsible for the integrity and accuracy of that information. Questionable entries or reports should be reported to an appropriate supervisor or manager. No one should allow himself or herself to become part of a chain of incorrect information.

Records must be maintained as specified by our Records Management Policy. Information responsive to an investigation, suspected investigation or lawful request must never be altered or destroyed and must be maintained as directed by the Legal Department. Maintenance of such records may be outside the normal retention period.

### Financial Integrity

We seek to create value by achieving superior financial results. In pursuit of this goal, we must always produce honest, accurate and complete financial information, follow strict accounting principles and standards and have appropriate internal controls and processes to ensure that all accounting and financial reporting complies with the law.

Everyone must do their part to ensure that no false or intentionally misleading entries are made in the company's accounting records. Intentional misclassification of transactions regarding accounts, departments or accounting periods violates the law and our policies. All business records must fairly reflect transactions, be supported by accurate documentation in reasonable detail and comply with treasury and finance policies, accounting procedures and internal controls. In particular, all accounting records, expenditures, expense reports, invoices, vouchers, gifts, business entertainment and any other business expenses must be accurately and reliably reported and recorded.

All must have the responsibility to uphold our company's financial integrity standards and to cooperate fully with internal and external auditors. Information must never, under any circumstance, be falsified or concealed.

### **Anti-Money Laundering**

Everyone is obligated to conduct business in a way that prevents misuse of our business assets. We must adhere to anti-money laundering, financial crime and antiterrorism laws in all countries where we operate. To that end, Solenis has measures in place to ensure we work only with reputable partners who operate within the law and use resources obtained legally. We subject both suppliers and customers to comprehensive due diligence designed to flag inappropriate activities, including those that may be associated with illegally obtained money. Our engagement process includes identity and credentials-checks to facilitate transparent business relationships with reputable partners. We also train our employees about relevant functions within our company to help them identify and avoid any activities that could be construed as facilitation of tax evasion.

### **Protecting Confidential Information and Intellectual Property**

Protecting confidential information is the obligation of everyone and continues even if you leave the company. For example, employees should avoid discussing company confidential information (for example, trade secret information or chemical processes) in public places or with anyone who does not need to know the information. All computers, especially laptops, should be secured and used in compliance with our policies.

We require confidentiality agreements with parties to whom our confidential information is disclosed. Questions about the confidentiality of information or the need for a confidentiality agreement should be directed to the Legal Department.

In addition, the property (such as programs and software) and information (such as customer lists, price lists, contracts or documents) owned by others may be used only according to the terms of our license or other agreement to use the property or information. Unauthorized copying of software, tapes, books and other legally protected work is a violation of law that has potential financial consequences.

Using the intellectual property or confidential information of others without proper authorization is prohibited and can result in disciplinary action (up to and including termination), significant fines, criminal penalties, civil lawsuits and damages for our company and for individual violators. Additionally, we should never try to persuade or otherwise encourage employees or former employees of other companies to violate their confidentiality obligations to those companies.

Confidential information includes, but is not limited to, proprietary technical information, business plans, status of operations and equipment and non-public financial data. It further includes other non-public information that would be of use to competitors or harmful to Solenis if made public (such as inventions, trade secrets, formulas, customer lists and legal advice).

### **Privacy**

Privacy is recognized as a basic human right, and Solenis takes the privacy and protection of personal data very seriously. We treat personal data confidentially. We collect it and use it in accordance with applicable laws and regulations. This applies not only to our employees' data, but also to the data of our customers, suppliers, business partners and other individuals with whom we work. We have effective policies and procedures in place that assure the lawful, fair,

transparent and confidential handling of personal data entrusted to Solenis. Solenis has a global data privacy approach that complies with applicable global regulatory requirements.

### **Protecting Company Assets**

We all have a responsibility to safeguard and make proper and efficient use of company assets. This includes taking prudent steps to protect assets from loss, damage, misuse, theft, embezzlement or destruction. Our assets are intended to be used to conduct legitimate company business. Any act that involves theft, fraud, embezzlement, destruction, misuse or misappropriation of any asset is prohibited.

If applicable law does not specifically require otherwise, work and other property prepared by and created for the company belong to the company, including, but not limited to, any inventions, patents or copyrights developed while working for the company.

### **Responding to the Media**

Employees should refer to the Communications Department or the Legal Department any request that is addressed to the company, from the media or other third parties, for information about Solenis.

### **Conflicts of Interest; Disclosure**

Our shareholders expect business decisions to be made in the best interests of the company and its shareholders. Your decisions and actions must be based on sound business judgment, not on personal interest or for personal gain, to avoid conflicts of interest. Therefore, avoid situations where company interests may conflict with your personal interests.

The appearance of a conflict can be as damaging as an actual conflict. Solenis employees are required to immediately disclose to the company any situation that is a conflict of interest or has the potential to be interpreted as a conflict of interest by others, including other employees, customers, suppliers and the public. Potential conflicts of interest include, but are not limited to, the following:

- personal relationships that can cause an employee to improperly prioritize her or his personal interests
- personal financial interests that can interfere with an employee's work-related duties
- pursuit of business opportunities for personal or financial gain, at the expense of company interests
- external mandates or activities that may prevent an employee from acting in the company's best interest or reflect negatively on Solenis
- receipt of any unauthorized fees, commissions or excessive gifts or entertainment that may influence an employee's judgement or cause an employee to act in a manner that is not in the company's best interests

Employees also must consider potential conflicts with Solenis business interests before agreeing to serve as an employee, director or officer for an outside business; before seeking a political or other government position; and before engaging in service with a charitable, civic, religious, educational, public, political, or social organization.

Questions about and disclosures of these situations should be addressed directly to the Legal Department or the Office of Ethics and Compliance or via the company's Share Your Concern intranet page.

## Responsibility to the Marketplace

We depend on strong relationships with our customers, suppliers and other business partners. We intend to do business only with those individuals and businesses that comply with the law and demonstrate high standards of ethical business behavior. You are expected to identify and report legal or ethical issues (such as those involving environmental, health, safety, security, corrupt payments or practices, or competition/antitrust violations) concerning third-parties or customers that may pose a risk to the company. Such issues will be addressed immediately and appropriately.

### Marketing Practices

We compete for business aggressively and honestly and do not misrepresent our products, prices or services. We do not make false or misleading claims about our products, prices or services or about the products, prices and services of our competitors.

### Purchasing Practices

All purchasing decisions are based on the best value for the company and in alignment with our business standards and goals. Important components of purchasing include confirming the legal and financial condition of the supplier, complying with our conflicts of interest policy, soliciting competitive quotes, exploring partnering arrangements and incentive-based contracts and verifying quality.

### Product Stewardship

We provide quality products and services that add value for our customers and that can be used and processed in a safe manner. We strive to improve the products we sell by reducing the risk associated with their use or consumption while maintaining the value derived by the customer. The company puts in place processes to comply with country-specific regulations concerning the stewardship of our products.

### Competitive Intelligence and Other Information Gathering

We obtain information about competitors, competitors' products, customers and suppliers ethically and legally. Theft or misappropriation of third-party proprietary information is prohibited, including obtaining or acting to obtain such information from a competitor's current or former employees.

### Antitrust and Competition

We are committed to complying with the antitrust and competition laws of all countries where we do business. These laws are designed to encourage and protect free and fair competition. Anyone who has a question or concern about the potential antitrust or competition law implications of a discussion, a decision (potential or actual), an interaction or an action (potential or actual) has the responsibility to consult with the Legal Department.

Generally speaking, employees are restricted or prohibited by antitrust and competition laws and company policy from:

- communicating with competitors about prices and conditions of sales, employee salaries, bids, levels of production
- allocating products, services, sales, customers, suppliers or territories
- establishing the resale price of a product

- conditioning the sale of products on an agreement to buy other Solenis products
- making decisions to price product below cost
- agreeing with a third-party to limit manufacturing production
- agreeing with a third-party to refuse to deal with certain customers, suppliers or even other competitors.

In addition to damaging our reputation, violating antitrust or competition laws could subject us and the violator to severe monetary penalties or civil or criminal enforcement by one or more governments or lawsuits by competitors, customers and other affected parties seeking damages.

## **International Trade Regulations**

Many laws govern the conduct of our international trade. The following sections identify a few of these laws.

### **Anti-Boycott**

No employee may cooperate in any way with an unsanctioned foreign boycott of countries as provided under U.S. law. The most well-known prohibited international boycott is the boycott of Israel. Any request for information or action that seems to be related to this or any other illegal boycott should be forwarded immediately to the Legal Department.

### **Economic Sanctions and Export Controls**

The laws of the United States and those of many other countries restrict trade with certain countries. We have operations and customers around the world and must comply with all economic restrictions and applicable export control laws of all countries where we conduct business. Employees and agents uncertain of what restrictions may apply and how to comply with the applicable trade regulations should contact the Global Trade representative in the Supply Chain Department or the Legal Department.

### **Anti-Corruption**

Solenis does not tolerate any form of corruption, including bribery — public or private, active or passive. Solenis employees and business partners are prohibited from giving, promising to give, soliciting or accepting any form of improper advantage, whether directly or indirectly, to or from any individual or organization with the intention to obtain or retain business. Improper advantage may be of any value and come in different forms, including payments (bribes, illegal rebates, kickbacks), gifts, meals and entertainment.

Solenis' anti-bribery and corruption rules apply globally to all of the company's public and private business transactions. Many countries have strict anti-bribery laws and regulations, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act. Solenis demands from its employees and business partners strict compliance with these laws.

### **Gifts, Meals and Entertainment**

In many industries and countries, gifts and entertainment are used to strengthen business relationships. Throughout the world, one principle is common and clear: no gift, favor or entertainment should be accepted if it obligates or appears to obligate the person receiving it. We maintain specific policies regarding providing and accepting gifts, meals and entertainment. These policies are accessible on the Solenis intranet or through the Legal Department, the Office of Ethics and Compliance or your manager.

### **Providing and Expensing Gifts**

Gifts, meals or entertainment may not be provided if they are against applicable law or our or the recipient's company policy.

No form of entertainment should be undertaken that could reasonably lead to the embarrassment of the company or have the appearance of impropriety. Entertainment that is degrading or exploitive because of sexual or racial content is strictly prohibited. A gift of anything of value to a government official requires the advance written approval of the Legal Department.

### **Soliciting or Accepting Gifts**

Unless specifically permitted by our policies, you may not solicit or accept gifts, meals or entertainment, including, but not limited to, trips, lodging, event tickets, vacations and personal gratuities. Our policies strictly prohibit receipt of the following:

- a gift or loan of cash, cash equivalents (such as gift certificates) or securities
- a loan of property, including vacation facilities or equipment for personal use
- a personal service performed free of charge or for less than market value
- a discount on the purchase of goods/services for personal use.

### **Inside Information**

Because of our job duties, we may receive confidential information about Solenis, customers or other companies with which we do business or intend to do business before the information is publicly available to others. Some of this non-public or inside information may be considered material to investor decisions and could create an unfair advantage if securities or other enterprise interests are bought or sold based on such information. Employees are prohibited from using, encouraging others to use, or facilitating the use by others of non-public information about Solenis, or about other companies with which the company does business or intends to do business, for personal benefit including, but not limited to, securities trading.

## **Responsibility to the Community and the Government**

Protecting human health and the environment is an important responsibility and is part of our business strategy as a Responsible Care company. We work to reduce our environmental impact by reducing or preventing waste generation, emissions and releases, and by developing processes to safely use, handle, transport and dispose of all raw materials, products and wastes for which we are responsible. We help others understand their responsibilities to ensure that they use Solenis products in a safe and responsible manner. We strive for continual improvement in our performance and in our partnerships with governmental agencies, contractors and communities.

Each of us has the responsibility to act in a manner that reduces the risk of incidents that may adversely impact human health or the environment, and we are expected to support this commitment by:

- carrying out our responsibilities in compliance with laws, regulations and our company policies
- consistently implementing all work practices to protect the environment and to prevent personal injury or property loss
- actively encouraging care and regard for the environment among co-workers and in the community

- identifying opportunities to continuously improve environmental, health and safety performance
- immediately reporting any actual or potential environmental, health, safety or security problems to your manager, to the Environment Health and Safety Department or via the Share Your Concern page on the company's intranet.

## **Communities**

We seek opportunities to work with the communities in which we do business. As a good corporate citizen, we act responsibly, conduct operations safely and prepare for emergencies that may occur. We also give back to the community by supporting and partnering with educational, civic and charitable organizations.

## **Political Activities**

Many governments have laws prohibiting or regulating corporate contributions to political parties, campaigns or candidates in the form of cash or the use of corporate facilities, aircraft, automobiles, computers, mail services or personnel. In addition, our own policies prohibit certain political contributions, even though otherwise permitted by applicable law. Any proposed use of company resources in support of any political contributions or activities in any country must be pre-approved by the Legal Department.

Lobbying activity on behalf of the company is permissible but is highly regulated by law. Employees who communicate with government officials on behalf of Solenis must contact the Legal Department to ensure that such activities fully comply with the law and our policies.

We respect everyone's right to participate in the political process and to engage in political activities of his or her choosing. However, you must make clear that your views and actions are your own and not necessarily those of Solenis. Employees may not use company resources to support their personal choice of political parties, causes or candidates.

## **Requests from Government Agencies and Authorities**

Solenis cooperates with reasonable requests from government agencies and authorities. Solenis is entitled to all of the safeguards provided by law to any person from whom information is requested or who is the subject of an investigation, including representation by legal counsel from the very beginning of the investigation. Therefore, all requests for information beyond what is provided on a routine basis must be immediately reported to the Legal Department.

## **Where to Get Help, Report or Share a Concern**

Every employee is required to make an immediate report (whether based on personal knowledge or not) of any suspected or actual violations of the Global Standards of Business Conduct (the Code), any other corporate policies or procedures, or any applicable law by contacting the Legal Department, the Office of Ethics and Compliance, the Human Resources Department, or a manager, or by submitting a report via Share Your Concern intranet page.

Similarly, any issue concerning the company's financial integrity, including questionable accounting or auditing matters, should be reported immediately to the General Counsel or the Office of Ethics and Compliance, or by submitting a report via Share Your Concern intranet page. If requested, the General Counsel will arrange for concerns to be submitted anonymously to the board of directors.

The hotline function on the Share Your Concern page is available 24 hours a day, 7 days a week; translation service is available for callers who speak languages other than English.

Local contact numbers for the hotline on the Share Your Concern page are provided below. All calls can be completely anonymous and are handled in a confidential manner. We disclose the substance of a report or the identity of the person making the report, if known, only on a need-to-know basis, to the extent deemed necessary by the company in order to conduct a thorough investigation and to respond appropriately to the report.

[Share Your Concern](#) / Hotline:

United States and Canada: 833-203-3981

For other countries, [click here for the access code and phone numbers](#).

### **Non-Retaliation Policy**

We will not permit any form of retaliation against an employee who reports, in good faith, any actual or suspected violation of our Code, any company policy or the law. Intentional submission of a false report will not be tolerated. If you believe you have been retaliated against for making a good faith compliance report, you should immediately contact the Human Resources Department, the Legal Department or the Office of Ethics and Compliance.

### **General Information**

This Code is a guide for the uniform management of company expectations and rules that affect our operations. Nothing in this document, in any company policies and procedures or in other related communications (oral or written) creates or implies an employment contract or a guarantee of continued employment. The company reserves the right to modify, change or alter any section of this document at any time, as needed.

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## **SOLENIS POLICY**

### **Internal Operations Human Rights Risk Assessment**

#### **1.0 Policy**

Solenis is committed to achieving, upholding and promoting the highest standards of ethical conduct in its activities, including ensuring that fundamental human, employment and labor rights are met across our operations. Solenis expects its employees and third parties in our value chain to conduct business according to these standards, in line with Solenis' [Global Standards of Business Conduct](#), [Human Rights policy](#), and all applicable laws.

Solenis adopts the norms and principles set forth in the [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 Declaration on Fundamental Principles and Rights at Work](#), setting Solenis' standards across our value chain.

#### **2.0 Due diligence**

At Solenis, Human Rights Due Diligence is a continuous risk management process to review, assess, prevent, and mitigate human risks in our own operations and supply chain ([Supplier Risk Assessment Protocol](#)).

This document refers to risks, mitigation and remediation measures observed in our own operations and is reviewed at least annually.

#### **3.0 Assessment**

As part of our commitment to upholding human rights across all areas of our business, Solenis integrates regular monitoring and review processes into our internal operations to ensure alignment with our Human Rights commitments. Assessments are conducted at least annually, and more frequently as needed based on changes in business activities, regulatory developments, or identified risks. These reviews help us proactively identify, prevent, and address potential human rights impacts across our operations.

### 3.1 Matrix



### 3.2 Results and reporting

Solenis is committed to transparency and continuous improvement in upholding human rights across our operations. The results of our human rights assessments are used to identify areas for improvement, guide mitigation strategies, and inform decision-making throughout the organization.

Findings are shared with relevant internal stakeholders and may involve internal or external legal counsel when appropriate – particularly in cases where legal, regulatory, or reputational risks are identified. These insights are also incorporated into broader sustainability and enterprise risk management processes.

Key outcomes and progress are summarized in our annual sustainability report, and any significant developments are escalated to leadership or governing bodies as needed. Solenis maintains open internal reporting channels to ensure accountability and responsiveness to human rights-related concerns.

### 3.3 Remediation

As a result of the risks management process, Solenis will adopt applicable and proportional remediation measures as needed. Our remediation strategies are designed to prevent future occurrences by strengthening our protocols, enhancing our due diligence processes, and fostering

a culture of transparency and accountability. The following personnel are commonly responsible for implementing these strategies:

- **Human Resources Personnel:** Responsible for creating and implementing policies and training materials, reviewing employment-related processes, ensuring non-discrimination, equal opportunity, and safe work environments.
- **Legal Personnel:** Responsible for ensuring compliance with all applicable laws and international standards, providing guidance on labor rights, workforce discrimination and compliance, managing the hotline channel, conducting or overseeing investigations, and aligning on applicable and lawful disciplinary measures when a violation is observed. Legal is also engaged in the review of M&A activity to ensure alignment, by way of its due diligence, with human rights standards, contractual provisions, and post signing and closing integration compliance.
- **Employee Health and Safety Personnel:** Responsible for ensuring a safe working environment, addressing any health and safety concerns, conducting regular safety audits, reviewing health and safety processes and procedures, promoting health and safety awareness, and ensuring compliance with occupational health and safety regulations.
- **Office of Data Privacy:** Responsible for protecting sensitive information, ensuring compliance with data privacy regulations, managing data breach responses, and conducting regular privacy assessments to safeguard personal and organizational data.

### 3.3.1 Targeted remediation examples by risk area

When human rights risks are identified within Solenis' operations, we take appropriate and proportional remediation measures to address the issue, support affected individuals, evaluate due diligence processes, and prevent recurrence. While mitigation actions are in place to reduce the likelihood of such risks, remediation is applied when prevention falls short. Remediation measures may include different forms of compensations or remedies for any violations, including, but not limited to formal apologies, financial or non-financial compensations, individual or collective disciplinary measures, and training. Examples include:

- **Human Trafficking and Forced Labor**
  - Removal and/or reassignment of individuals, pending outcome of investigation
  - Termination of non-compliant vendors including contingent worker providers
  - Access to remedy for affected individuals (e.g., relocation support)
  - Financial remediation as appropriate
- **Child Labor**
  - Transition underage worker away from unsanctioned tasks, reassignment as appropriate
  - Offer educational or social support where legally appropriate
  - Strengthen age verification during recruitment and onboarding
- **Freedom of Association and Collective Bargaining**
  - Reinstate or support affected employees when rights were suppressed, pending outcome of investigation
  - Translate and distribute materials on organizing rights

- **Discrimination**
  - Take appropriate disciplinary action and/or make organizational adjustments, following investigation
  - Adjust hiring, promotion, or pay decisions as appropriate where inequity is found
  - Retraining on anti-discrimination, anti-harassment, and unconscious bias policies
- **Health and Safety (Working Conditions)**
  - Take appropriate disciplinary action and/or make organizational adjustments, following investigation
  - Provide medical care or compensation to impacted individuals
  - Perform mandatory site retraining and safety refreshers
- **Data Privacy**
  - Notify affected parties of breaches per Data Breach Notification Policy
  - Strengthen IT security and retrain staff
- **M&A – company acquisition**
  - Conduct a thorough review of the target company’s labor practices, safety protocols, policies, and procedures. The acquired company is held to the same human rights and ethical standards as all Solenis’ business operations, ensuring consistency across our global footprint.
- **Other Human Rights (e.g., Community Impact, Resettlement)**
  - Provide practical and emergency aid (e.g., through SolenisGives)
  - Provide relocation assistance or visa support as applicable

#### 4.0 Definitions

The definitions for this risk assessment include key terms such as likelihood and impact. Likelihood refers to the probability of a risk occurring, while impact denotes the potential consequences or severity of the risk. These definitions are based on industry standards and best practices to ensure a comprehensive evaluation of risks.

Our definitions are also informed by Solenis' double materiality assessment (DMA) completed in 2024, in alignment with the EU’s Corporate Sustainability Reporting Directive (CSRD). This assessment included both financial and non-financial risks, providing valuable insights into the impact of our business on stakeholders, including human rights. The data was collected from a wide range of inputs and stakeholder perspectives.

#### 4.1 Likelihood

<b>1 = Very Unlikely</b>	<b>2 = Unlikely</b>	<b>3 = Possible</b>	<b>4 = Likely</b>	<b>5 = Almost Certain</b>
Remote probability that the event or condition will occur	Do not expect the event or condition to occur	There is a possible chance of the risk occurring	Strong possibility that the event or condition will occur	Certainty or highly probable that the event or condition will occur

## 4.2 Severity

	1 = Very Low	2 = Low	3 = Medium	4 = High	5 = Very High
<b>Financial</b>	Financial risk of (<\$10MM)	Financial risk of (\$11-25MM)	Financial risk of (\$26-50MM)	Financial risk of (\$51-100MM)	Financial risk of (>\$100MM)
<b>Reputational</b>	Negligible risk of negative media coverage	Negative media coverage does not impact new business opportunities or client relationships	Negative media coverage mildly affects new business opportunities or client relationships	Reputational damage from negative media coverage results in some loss of new business and clients	International negative media coverage results in the loss of new business and clients
<b>Operational</b>	Negligible effect on internal operations (people/systems)	Minor impact on systems, causing a slight increase in workload for people	Noticeable disruption to internal operations due to system failures and people departures	Significant system outages, with people either leaving or becoming overworked	Complete breakdown of internal operations, preventing the business from functioning
<b>Compliance</b>	Negligible breach of regulation with no impacts	Minor breach of regulation that requires reporting to the regulator/courts	Breach of regulation that requires reporting to the regulator/courts and a fine/penalty	Breach of regulation that requires reporting to the regulator/courts and multiple fines/penalties and litigation	Major breach of regulation that requires reporting to the regulator/courts and significant prosecution, fines/penalties and litigation

## 4.3 Stakeholders

- **Employees:** Individuals under direct contract with employer and whose scope of work is within employers' control, inclusive of all time types and management levels. Excludes contingent workers, external contractors and consultants. This also applies to employees who joined the company through merger and acquisition (M&A) activity.
- **Contingent Workers:** Individuals contracted through a third party and whose scope of work and/or work environment is directly controlled by Solenis.
- **Employee Representative Bodies:** Organizations certified or otherwise recognized for the purpose of bargaining or consulting on behalf of employees, inclusive of unions, works councils, and health and safety committees.
- **Surrounding Communities:** Local stakeholders include anyone who can be affected by our operations, but specifically residents, including our own workforce; businesses; governments, including schools and transportation agencies; first responders such as firefighters, police and response teams; public and private utilities; and NGOs.

## 5.0 Risks and mitigation

This section outlines the key risks identified through the risk assessment process and the corresponding mitigation strategies. The risks identified are related to labor and employment, environment and communities near Solenis. The description summarizes key topics that must be observed in Solenis' operations, based on the company's profile. For each category, Solenis has

already adopted mitigation measures to address and mitigate these risks. Our approach is based on the insights gained from Solenis' Double Materiality Assessment (DMA) completed in 2024, in alignment with the EU's Corporate Sustainability Reporting Directive (CSRD).

Solenis ensures all employees have clear and equitable access to information about their rights. Our Global Standards of Business Conduct are available in 22 languages to effectively communicate ethical standards and expectations to our workforce and business partners. Internally, key policies, including our Code of Conduct, and reporting channels are shared through onboarding, training, and accessible platforms. Employees are encouraged to use any available channel, including our "Share Your Concern" portal, where they can raise concerns anonymously and without fear of retaliation, or contact their managers and Human Resources department directly. Additionally, any third-party can access Solenis' hotline and other available channels on our website.

### 5.1 Labor

Risk	Description	Mitigation Measures
<p>Health &amp; Safety of Employees</p>	<p>Supporting and protecting the physical, mental, and emotional well-being of workers within internal company operations, regarding:</p> <ul style="list-style-type: none"> <li>• Unsafe or Hazardous Working Conditions</li> <li>• Inadequate Access to Health Resources</li> <li>• Limited Safety Practices</li> <li>• Excessive Working Hours</li> <li>• Lack of Emergency Preparedness</li> <li>• Retaliation or Suppression of Concerns</li> </ul>	<ul style="list-style-type: none"> <li>• Global Environment, Health &amp; Safety (EH&amp;S) Policy implemented across all sites</li> <li>• Certified to ISO45001, ISO14001 and RC14001, and actively participating in the Responsible Care program; under RC45001 certification, new sites are certified within 3 years of becoming part of Solenis</li> <li>• Safe working conditions are a recognized human right under the ILO: <a href="#">Fundamental Principles and Rights at Work   International Labour Organization</a></li> <li>• Participates in the <a href="#">Responsible Care®</a> program and aligns with international labor standards to ensure safe, healthy, and respectful working conditions.</li> <li>• Regular safety training and site-specific risk assessments</li> <li>• TRR monitoring and safety champions implementation</li> <li>• Annual, mandatory safety days for commercial and supply chain workers</li> <li>• Well-being Index included in annual employee engagement surveys</li> <li>• Employee Assistance Programs (EAP) and mental health resources available globally</li> <li>• Local health &amp; wellness initiatives (onsite programs, fitness incentives, awareness campaigns)</li> <li>• Safety Committees and EH&amp;S reporting processes in place</li> </ul>

		<ul style="list-style-type: none"> <li>• Crisis management protocols and emergency response plans established</li> <li>• Confidential reporting of safety concerns through the Solenis Safety Hotline at 1-844-SOLENIS</li> <li>• Provision of Personal Protective Equipment (PPE)</li> <li>• Ensure compliance with health and safety protocols such as auditory exams, respiratory fit tests, and other required medical evaluations based on job specific exposure risks</li> <li>• Offers comprehensive health benefits including medical, dental, and vision coverage to support employee physical and mental well-being.</li> <li>• Provide paid parental leave, hybrid working policies and flexible work arrangements to support work-life balance, where applicable.</li> <li>• Includes retirement savings plans and financial education resources to promote long-term employee security.</li> <li>• Provides access to Virgin Pulse, a digital platform that supports holistic wellness—physical, emotional, and financial—through health tracking, challenges, resources, and rewards.</li> </ul>
<p>Working Conditions</p>	<p>Working conditions refer to the environment, terms, and circumstances under which employees perform their jobs. This includes not only the physical setting but also the organizational culture, compensation structure, job security, and treatment of employees. Poor working conditions can pose significant human rights risks, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Excessive Working Hours or Inadequate Rest</li> <li>• Unfair Wages or Inconsistent Compensation</li> <li>• Unsafe or Unhealthy Work Environment</li> <li>• Discrimination and Harassment in the workplace</li> <li>• Lack of Worker Voice and Representation</li> <li>• Job Insecurity and Precarious Works</li> </ul>	<ul style="list-style-type: none"> <li>• Commitment to providing fair compensation aligned with living wage principles across applicable locations</li> <li>• Annual compensation benchmarking and pay equity reviews</li> <li>• Adherence to global labor standards and local employment laws across all operations</li> <li>• Global Code of Conduct outlining expectations for ethical behavior and respectful workplace culture</li> <li>• Global Environment, Health and Safety (EH&amp;S) Policy and regular workplace safety audits</li> <li>• Mandatory training on workplace behavior, harassment prevention, and ethical conduct</li> <li>• Flexible and hybrid working policies to support work-life balance where applicable</li> </ul>

		<ul style="list-style-type: none"> <li>• “Share Your Concern” confidential reporting platform for workplace grievances</li> <li>• Regular engagement surveys capturing feedback on working conditions and employee experience</li> <li>• Structured grievance resolution process in line with human rights commitments</li> <li>• Diversity, equity, and inclusion (DEI) initiatives</li> <li>• Employee Assistance Programs (BeYou) and mental health resources available globally</li> </ul>
<p>Illegal Forms of Labor</p>	<p>Illegal forms of labor refer to employment practices that violate national laws or international labor standards including but not limited to:</p> <ul style="list-style-type: none"> <li>• Child labor</li> <li>• Forced or compulsory labor</li> <li>• Human trafficking</li> <li>• Improper classification of hazardous job roles</li> <li>• Lack of standardized procedures for verifying worker eligibility</li> <li>• Limited worker awareness of rights and protections</li> <li>• Failure to provide accessible grievance mechanisms</li> <li>• Other coercive or exploitative practices (i.e. debt bondage)</li> </ul>	<ul style="list-style-type: none"> <li>• Prohibited use of all forms of forced labor in internal policies, including indentured labor, bonded labor, military labor, slave labor, and any form of human trafficking</li> <li>• Conform with International Labor Organization (ILO)’s conventions for minimum age and child labor</li> <li>• Solenis does not employ underage workers and verifies age during recruitment to ensure compliance with minimum working age laws</li> <li>• Define and restrict hazardous roles to qualified adults through clear job classifications and safety assessments.</li> <li>• Globally standardized onboarding procedures, including verification of employment eligibility, birthdate, and preferred payment method</li> <li>• Regular Payroll audits</li> <li>• Require third-party labor providers to ensure they follow Solenis’ labor standards and comply with local laws</li> <li>• “Share Your Concern” confidential reporting platform for workplace grievances</li> <li>• Regularly update internal policies and procedures to align with evolving international labor standards and national laws</li> </ul>
<p>Discrimination</p>	<p>Unfair or unequal treatment of employees based on personal protected characteristics within internal company operations, such as:</p> <ul style="list-style-type: none"> <li>• Discriminatory Hiring and Promotion Practices</li> <li>• Unequal Pay or Benefits</li> <li>• Workplace Harassment or Bullying</li> </ul>	<ul style="list-style-type: none"> <li>• Solenis is an Equal Opportunity Employer and includes an EEO statement on all job postings</li> <li>• Anti-Discrimination and Anti-Harassment Policy outlining formal complaint procedures for reporting and investigating concerns, with legal action pursued when appropriate.</li> </ul>

	<ul style="list-style-type: none"> <li>• Lack of Reasonable Accommodation</li> <li>• Inadequate Grievance Mechanisms</li> <li>• Bias in Disciplinary Actions or Layoffs</li> <li>• Exclusion from Development or Leadership Opportunities</li> </ul>	<ul style="list-style-type: none"> <li>• “Share Your Concern” confidential reporting platform for workplace grievances.</li> <li>• Mandatory anti-harassment and unconscious bias training for all employees</li> <li>• Mandatory quarterly training for all people managers on recruitment best practices (“Hiring the Best”)</li> <li>• Maintain voluntary two-step self-identification globally</li> <li>• Mandatory compliance with <a href="#">Diverse Slate Policy</a> for all job openings</li> <li>• Monthly review of KPIs, recruitment and retention strategies, and broader diversity landscape</li> <li>• Talent Reviews and Succession Planning Process conducted annually</li> <li>• Established Employee Business Resource Groups (EBRGs)</li> <li>• Conduct annual compensation and pay equity reviews to benchmark internal pay practices and ensure alignment with market standards and equity goals</li> <li>• Perform cross-functional pay audits to identify disparities across roles, functions, and pay bands, promoting consistency and fairness in compensation practices, especially as it pertains to M&amp;A activities</li> <li>• Enhance awareness and visibility of equity and inclusion through targeted communications and programming, particularly during our annual Ethics Week</li> <li>• Monitor perceptions of fairness and inclusion through dedicated pulse questions in the annual engagement survey, focusing on equity and fair treatment across the organization</li> </ul>
<p>Freedom of Association &amp; Collective Bargaining</p>	<p>Freedom of Association and Collective Bargaining are fundamental human rights that empower workers to organize, negotiate, and advocate for improved working conditions.</p> <ul style="list-style-type: none"> <li>• Local legal restrictions on union activity</li> <li>• Retaliation or discrimination against union participants</li> <li>• Employee unawareness of rights</li> <li>• Barriers to union formation or recognition</li> </ul>	<ul style="list-style-type: none"> <li>• Maintain and enforce a Global Code of Conduct and Human Rights Policy, which affirms support for freedom of association, collective bargaining, and non-retaliation.</li> <li>• Ensure compliance with local labor laws and government regulations, including timely updates to workplace postings and materials in line with state and local guidelines.</li> <li>• Provide clear, region-specific communication on employee rights,</li> </ul>

	<ul style="list-style-type: none"> <li>• Limited rights for contracted or temporary workers</li> <li>• Cultural or language obstacles to participation</li> <li>• Lack of monitoring and accountability</li> </ul>	<p>including the right to organize and form unions, translated where appropriate to ensure understanding.</p> <ul style="list-style-type: none"> <li>• Support fair and transparent processes for union formation, recognition, and engagement with employee representatives or advisory councils where applicable.</li> <li>• Promote an inclusive culture that encourages open dialogue and employee feedback—regardless of union status.</li> <li>• Provide structured, confidential grievance mechanisms through platforms like “Share Your Concern,” along with anonymous reporting tools (e.g., Ask John), HRBP access, and direct management channels.</li> <li>• Investigate all complaints promptly and thoroughly, reinforcing a zero-tolerance approach to retaliation.</li> <li>• Collaborate across HR, Legal, and local leadership to ensure labor rights are respected consistently and lawfully across all regions.</li> <li>• Retain the right to engage directly with employees at all Solenis facilities to raise awareness, address concerns, and support an open, respectful workplace.</li> <li>• Conduct regular reviews of relevant policies and practices to ensure alignment with evolving labor standards and regulatory obligations.</li> <li>• Ensure compliance with local government entities as it pertains to labor laws.</li> <li>• Translate key materials that support local engagement in local languages</li> <li>• Regular policy reviews to align with evolving labor standards and legal obligations</li> <li>• Designated HR representatives are assigned responsibility to consult and regularly meet with representative bodies (workers councils, unions, etc.)</li> </ul>
Employee Data Security	<p>Data security is crucial for protecting employees' sensitive information, such as:</p> <ul style="list-style-type: none"> <li>• Unauthorized Access; Data Privacy Breach</li> <li>• Breach of Confidentiality</li> </ul>	<ul style="list-style-type: none"> <li>• Policies and procedures securing compliance with the law, fairness, transparency, integrity and confidentiality of personal data</li> <li>• Monitoring jurisdictions and local laws</li> </ul>

	<ul style="list-style-type: none"> <li>• Compromise of systems, services and/or information</li> <li>• Cyber-attacks</li> </ul>	<ul style="list-style-type: none"> <li>• Data Protection Impact Assessment Process</li> <li>• Audit and programmatically respond to identified vulnerabilities</li> <li>• Ensure employee data is accessed and processed in compliance with consent requirements and applicable information security laws and standards, including but not limited to GDPR</li> <li>• Apply anonymization techniques to employee data for both internal analysis and external reporting to protect individual privacy.</li> <li>• Internal and External Information Technology Assessments (multiple times per year)</li> <li>• ISO 27001 Certification</li> </ul>
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## 5.2 Environment

Risk	Description	Mitigation Measures
Negative Impact on Environment	<p>Unintended harm caused to the natural environment through company operations, including manufacturing processes, product usage, and manufacturing facility activities. This includes impacts related to:</p> <ul style="list-style-type: none"> <li>• Exposure to Pollution and Toxins</li> <li>• Unsafe Waste Management</li> <li>• Water Scarcity or Contamination</li> <li>• Climate Change Contribution</li> <li>• Impact on Indigenous or Vulnerable Communities</li> <li>• Lack of Transparency or Stakeholder Engagement</li> <li>• Untimely notification of concerns or exposure risks</li> </ul>	<ul style="list-style-type: none"> <li>• Company-wide Sustainability Goals tied to emissions reduction, water conservation, and waste minimization</li> <li>• Use of ISO 14001-certified Environmental Management Systems at manufacturing sites</li> <li>• Investment in eco-friendly technologies and sustainable chemistry solutions</li> <li>• Environmental performance tracking and reporting aligned with GRI and SASB frameworks</li> <li>• Supplier Code of Conduct to ensure environmental responsibility throughout the value chain</li> <li>• R&amp;D focus on greener product formulations and reduced environmental impact across the product lifecycle</li> <li>• Annual Sustainability Report with publicly disclosed targets and progress</li> <li>• Active participation in environmental stewardship initiatives and partnerships with NGOs</li> </ul>

### 5.3 Community

Risk	Description	Mitigation Measures
Well-being, Health & Safety of Communities	<p>Supporting the physical, mental, and environmental well-being of both employees and surrounding communities in areas where Solenis operates. This includes efforts related to:</p> <ul style="list-style-type: none"> <li>• Environmental Contamination</li> <li>• Poor Community Engagement</li> <li>• Displacement Without Support</li> <li>• Inadequate Emergency Response Preparedness</li> <li>• Strain on Local Infrastructure</li> <li>• Failure to Respect Cultural or Indigenous Rights</li> <li>• Social or Economic Exclusion</li> </ul>	<ul style="list-style-type: none"> <li>• Implementation of a global Environment, Health and Safety (EH&amp;S) Policy across all sites</li> <li>• Regular safety audits and risk assessments at manufacturing and office locations</li> <li>• Certified to ISO45001, ISO14001 and RC14001, and actively participating in the Responsible Care program.</li> <li>• Extended access of Employee Assistance Programs (BeYou) and mental health resources globally to employee family members</li> <li>• Annual community engagement programs, including local environmental cleanups and STEM education outreach</li> <li>• Ongoing monitoring and reporting of environmental performance to reduce impact on surrounding communities</li> <li>• Emergency preparedness and response training conducted regularly</li> <li>• Corporate Social Responsibility (CSR) Program includes Creating Shared Value (CSV) and platform to support local development and volunteerism.</li> <li>• SolenisGives Platform enables employee engagement in charitable giving, community service, and emergency relief.</li> <li>• Crisis Management Program includes trained global/regional teams across key functions to ensure rapid, coordinated response to community-impacting events, supported by a dedicated Crisis Management app for real-time communication and action tracking.</li> <li>• Community Relations Policy and site-specific Community Relations Plans (CRP) available on Solenis Global (SG).</li> </ul>
Resettlement	<p>Resettlement is the process of relocating individuals or communities displaced by a company's operations, with the goal of restoring or improving their livelihoods, living standards, and social networks.</p> <ul style="list-style-type: none"> <li>• Displacement of Vulnerable Groups</li> </ul>	<p>While Solenis does not have a formal resettlement policy, the company actively supports employees impacted by displacement events (e.g., natural disasters, political instability) through the following actions:</p> <ul style="list-style-type: none"> <li>• Leverage the Solenis Gives platform to provide emergency aid, supplies,</li> </ul>

	<ul style="list-style-type: none"> <li>• Inadequate Compensation</li> <li>• Loss of Livelihoods</li> <li>• Cultural and Social Disruption</li> <li>• Environmental Impact</li> <li>• Reputational Damage</li> <li>• Legal and Regulatory Non-Compliance</li> <li>• Operational Delays or Disruptions</li> <li>• Human Rights Concerns</li> <li>• Community Opposition or Conflict</li> </ul>	<p>and community support to affected employees.</p> <ul style="list-style-type: none"> <li>• Offer practical assistance, such as access to essential products (e.g., laundry detergent, hygiene kits), to help ease disruption during periods of displacement.</li> <li>• Evaluate relocation assistance and visa sponsorship options on a case-by-case basis for employees facing permanent or prolonged resettlement needs.</li> <li>• Maintain open reporting channels, such as the Share Your Concern platform, to ensure employees can raise issues or seek support confidentially and without retaliation.</li> </ul>
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## 6.0 Human rights considerations in merger and acquisition transactions

As part of the due diligence process, Solenis assesses the target company’s labor and human rights practices – including working hour policies, the presence (or absence) of formal grievance mechanisms, and workplace safety protocols – prior to finalizing any formal agreement.

Once the business transaction is complete, Solenis takes a series of actions to ensure alignment with our human rights standards and, where needed, implements remediation:

- Integrate the integrated entity workforce into Solenis’ Global Standards of Business Conduct and Human Rights Policy, including mandatory training on workplace rights and anti-discrimination.
- Establish a formal grievance mechanism, including access to the Solenis hotline, supported by our Investigations and Reporting Policies.
- Implement standardized safety practices, such as safety committee formation, PPE compliance, and regular audits, to align with Solenis’ EHS standards.
- Review and update employment contracts to ensure compliance with international labor standards, including fair wages, reasonable working hours, and the right to freedom of association.
- These efforts are led in coordination with Solenis’ Legal, HR, and Operations teams to ensure swift integration and consistent application of our human rights and ethical standards across all operations.

These actions are carried out in collaboration with the key stakeholders outlined above and apply to all employee types and demographics. We actively evaluate and mitigate identified risks to ensure timely alignment with Solenis’ ethical standards, fostering a consistent culture of respect, inclusion, and accountability across all operations.

## 6.1 Merger and acquisition assessment

- Labor Practices Review – Evaluation of compliance with international labor standards, including wages, working hours, freedom from forced labor, and legal employment status.
- Health & Safety Conditions – Assessment of workplace safety infrastructure, incident records, PPE compliance, and alignment with Solenis' EHS protocols.
- Freedom of Association and Collective Bargaining – Examination of whether workers are able to organize, join unions, or participate in collective bargaining without interference or retaliation.
- Non-Discrimination and Equal Opportunity – Review of policies and practices to ensure protection against discrimination in hiring, promotion, and termination.
- Child and Forced Labor Protections – Verification that robust systems are in place to prevent child labor and any form of coercive, bonded, or involuntary labor.
- Access to Remedy and Grievance Mechanisms – Evaluation of whether affected individuals have safe, accessible, and confidential channels to raise concerns, and whether processes for remediation are in place and effective.
- Stakeholder Engagement – Where appropriate, consideration of input from workers, unions, or community groups to inform risk analysis and mitigation planning.
- Third-Party Labor and Supply Chain Review – Identification of human rights risks posed by subcontractors, labor brokers, or extended value chain partners tied to the acquired entity.
- Employee Awareness and Training – Assessment of the extent to which relevant policies and expectations are propagated and upheld throughout the integrated entity workforce.

These assessments inform integration planning, remediation actions, and ongoing monitoring to ensure the integrated entity is brought into full alignment with Solenis' human rights and ethical standards.

## 7.0 References

- [Global Standards of Business Conduct](#)
- [Human Rights](#)
- [Investigations](#)
- [Reporting](#)
- [Community Relations](#)
- [Digital Security Program](#)
- [Share Your Concern Portal](#)
- [Responsible Care Policy](#)
- [Equal Employment Opportunity](#)
- [Anti-Harassment Policy](#)
- [Workplace Violence Policy](#)

## 8.0 Scope

This applies to Solenis' own operations.

## 9.0 Owner

Chief Sustainability Officer

## 10.0 Exceptions

There are no exceptions to this policy.

## Revision history

Effective date	Section	Description of change

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Policy number:	SL-PRT-002.001	Revision number:	N/A
Original effective date:	June 11, 2024	Pages:	6
Revised effective date:	N/A	Reviewed date:	January 1, 2026

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## **SOLENIS PROTOCOL Hiring Due Diligence**

### **1.0 Protocol purpose**

As a core value of the organization, Solenis is committed to human rights in the global workplace. The company has steps in place to ensure that we respect and follow the generally accepted standards and principles of promoting, protecting, and supporting basic human rights internationally. As such, the company's processes related to hiring and onboarding new employees, as well as for our existing employees, are designed to mitigate risk for the following human rights issues in accordance with our [Global Standards of Business Conduct](#) and [Human Rights Policy](#):

- Child Labor
- Discrimination
- Equal Remuneration
- Forced Labor
- Human Trafficking

### **2.0 Scope**

Solenis' commitment to supporting basic human rights applies to all individuals involved in the company's operations including, but not limited to, all employees (full time or part time), officers, contractors / temporary employees.

### **3.0 Risk mitigation measures**

As part of our efforts to monitor and reduce risk, we have implemented required procedures in our hiring process to combat human rights issues.

#### **3.1 Child labor**

Solenis' position with respect to human rights conforms with the International Labor Organization's (ILO) conventions for minimum age and child labor. Additionally, we screen 100% of new hires to ensure no child labor exists in our own operations.

#### **What do we do to mitigate risk?**

- Requiring applicants to confirm if they are at least 18 years of age. Refer to Section 9.
- Reviewing birthdate for new employees at the time of hire. Refer to section 9.
- Requesting and verifying new employee's work eligibility documentation upon start.

## How do we address infractions?

- Disqualify any applicant who is not at least 18 years of age.
- Rescind offer of employment for any new hire who fails to provide sufficient work eligibility documentation.

## 3.2 Discrimination

Solenis does not discriminate in hiring or employment-related decisions because of race, color, sex, religion, national origin, age, disability, sexual orientation, gender identity, genetic information, protected veteran status or any other category protected by federal, state or local law.

### What do we do to mitigate risk?

- Comply with [Equal Employment Opportunity \(EEO\) policy](#).
- Include EEO statement on job postings. Refer to Section 9.
- Execute Affirmative Action Plan (AAP) reporting.
- Maintain two-step voluntary self-identification.
- Monitor the Hiring Dashboard; assess hiring effectiveness, slate quality, time to fill, and representation across the pipeline.
- Provide training for hiring managers, recruiters, and HR professionals on mitigating bias and proper interview etiquette.
- Provide a “Share Your Concern” hotline and reporting portal.

### How do we remediate infractions?

- Investigate concerns in accordance with the [Reporting Policy](#) and [Investigation policy](#).
- Take corrective and disciplinary action when discriminatory hiring practices are substantiated, including consequences for responsible leaders up to and including termination.

## 3.3 Equal remuneration

Solenis compensates employees equitably and competitively relative to the industry and local labor market.

### What do we do to mitigate risk?

- Complete an annual compensation review.
- Audit gender pay-gap report consistently.
- Use third-party benchmarking.

### How do we address infractions?

- Take measures to adjust compensation where gaps are identified.

## 3.4 Forced labor and human trafficking

Solenis prohibits all forms of forced labor, including indentured labor, bonded labor, military labor, slave labor, and any form of human trafficking.

### What do we do to mitigate risk?

- Include a voluntary job application.
- Verify preferred payment method during onboarding.
- Verify work eligibility documentation at hire.
- Conduct payroll audits.
- Provide training on human trafficking recognition and prevention.
- Provide a “[Share Your Concern](#)” hotline and reporting portal open to all internal and external business stakeholders.

#### **How do we address infractions?**

- New hires must complete task to provide and verify preferred payment method in HR system.
- Rescind offer of employment for any new hire who fails to provide sufficient work eligibility documentation.

#### **4.0 Assessments / audits**

Assessments and audits used to monitor risk include:

- AAP Reporting
- Payroll Reporting
- Workday Reporting
- Gender Pay Gap Report
- Diversity Dashboard
- Compensation Review
- Benchmarking
- “Share Your Concern” hotline
- Date of Birth audit

Subsequent risk assessments may inform remediation actions, training, or control adjustments.

#### **4.1 Links**

- [Equal Employment Opportunity](#)
- [Global Standards of Business Conduct](#)
- [Human Rights Policy](#)
- [Investigation Policy](#)
- [Reporting Policy](#)
- [Internal Operations Human Rights Risk Assessment](#)

#### **5.0 Remediation measures**

If a violation is identified through audits or reporting, the company will:

- Promptly address the issue
- Implement appropriate remediation
- Update policies, processes, or controls
- Apply disciplinary measures as needed

### What happens if we identify risk?

When a new risk is identified, Solenis will evaluate risk severity, mitigation solutions, revise plans, and implement new controls as needed to mitigate future risk.

### What happens if we identify an issue or violation?

When a violation or an issue is identified through any assessment/audit or through the reporting process, Solenis will promptly address and act in a timely manner to investigate the violation /issue with appropriate remediation. Remediation might include, but is not limited to new revised policies, processes or controls and disciplinary measures.

### 6.0 Use and maintenance of protocol

This protocol is reviewed annually.

### 7.0 Owner

Director, Global Talent Acquisition

### 8.0 Revision history

Effective date	Section	Description of change
Jan 1, 2026		Updated entire document formatting and added screening target to section 3.1

### 9.0 Appendix

Images included in this section are U.S.-based examples; actual questions may vary by country and local law.

## Applicant questionnaire

### Application Questions

\* Indicates a required field

Do you have the legal right to reside and work in the country that you are applying to? (Proof of identity and eligibility will be required upon hire) \*

select one ▼

Will you now or in the future require sponsorship to maintain employment? \*

select one ▼

Are you at least 18 years of age? \*

select one ▼

## Employee birthdate verification

### Inbox

Actions Archive

Viewing: All Sort By: Newest

Edit Government IDs  
1 minute(s) ago - Due 02/09/2024

#### Edit Government IDs Onboarding Is Cool

1 minute(s) ago - Due 02/09/2024

#### Proposed IDs

National IDs 1 item

	*Country	*National ID Type	Current ID	Add/Edit ID	Issued Date	Expiration Date	Issued By
					MM/DD/YYYY	MM/DD/YYYY	

## EEO and Affirmative Action Statement

Why work here?

At Solenis, we understand that our greatest asset is our people. That is why we offer competitive compensation, comprehensive benefits, including medical, dental and vision insurance and a 401(k) plan; and numerous opportunities for professional growth and development. So, if you are interested in working for a world-class company and enjoy solving complex challenges, whether in the lab or in the field, consider joining our team.

Solenis is proud to be an equal opportunity and affirmative action employer. All qualified applicants will receive consideration for employment without regard to race, color, religion, sex, sexual orientation, gender identity, national origin or protected veteran status and will not be discriminated against on the basis of disability.

[Read Less](#)



Policy number: SL-POL-008.007      Revision number: 3  
Original effective date: June 1, 2018      Pages: 7  
Revised effective date: June 17, 2025      Reviewed date: June 17, 2025

## **SOLENIS POLICY**

### **Supplier Code of Conduct**

#### **1.0 Introduction**

Solenis is committed to achieving the highest standards of professionalism and ethical conduct in its operations and activities and expects its employees and third parties across the company's value chain to follow Solenis' [Global Standards of Business Conduct](#) (GSBC), this Supplier Code of Conduct (SCoC), and other applicable policies, including Solenis' Human Rights policy.

#### **2.0 Scope and application**

The SCoC applies to all our suppliers worldwide and to become or remain a valued partner Solenis requires its suppliers, their employees, their affiliated entities, their agents or anyone acting on behalf of the suppliers<sup>1</sup> to comply with this code. SCoC is not exhaustive, and suppliers are expected to use good judgment to ensure appropriate conduct relative to all applicable laws, regulations, standards and topics that are not specifically addressed in this document. We promote an open dialogue with all our suppliers and collaborate with them to help them meet our requirements.

This Solenis Supplier Code of Conduct (SCoC) outlines minimum standards for our suppliers in addition to applicable laws and regulations, and it forms an integral part of all contracts between the supplier and Solenis. If there are differences between the requirements of laws and regulation and this SCoC, or between the supplier's own code of conduct and this SCoC, the supplier must adhere to whatever is stricter. The most recent version of this Supplier Code of Conduct is available at [www.solenis.com](http://www.solenis.com).

If Solenis finds that the supplier is not acting in compliance with this SCoC, Solenis will specify which issues need to be corrected or improved. The supplier must then take corrective actions promptly and provide adequate evidence of improvements. Solenis nevertheless reserves the right to cancel outstanding orders, suspend future orders, and/or terminate the main contract with the supplier in case of a material breach of this SCoC or the supplier refusing to take corrective actions.

#### **3.0 Standards**

Solenis SCoC is based on the [Ten Principles of the United Nations Global Compact](#) initiative, the United Nations [Guiding Principles on Business and Human Rights](#), and the International Labor Organization's [Declaration on Fundamental Principles and Rights at Work](#). With an extensive

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<sup>1</sup> Any entity or individual supplying any goods or service to Solenis is considered as a supplier to Solenis.

global supplier base, these requirements present us with an opportunity to truly drive change in the world.

### 3.1 Legal standards

We understand that the future success of our suppliers depends upon understanding the laws and regulations that apply to their business wherever they operate. We set a minimum standard of compliance with the law but expect our suppliers to hold themselves to higher standards of compliance.

- **Antitrust and competition laws:** Suppliers shall comply fully with the antitrust and competition laws in the countries in which they operate. These laws are designed to encourage and protect free and fair competition and may restrict or prohibit price-fixing, bid-rigging, market allocation and other unfair trade practices. (See the Solenis [Antitrust and Competition Law policy, SL-POL-004.001](#).)
- **Business integrity, anti-corruption:** Suppliers must comply with all applicable anti-corruption laws and regulations including the [U.S. Foreign Corrupt Practices Act](#). Suppliers are prohibited from making, offering or promising anything of value to any person – including any foreign official – for the purpose of corruptly influencing any act or failure to act on the part of that official to obtain or retain business for Solenis or any other person. Any violation of applicable anti-corruption laws is strictly prohibited and will result in immediate termination of contract. (See the Solenis [Anti-corruption policy, SL-POL-004.004](#).)
- **Trade regulations:** Suppliers must comply with all the sanctions, export controls and anti-boycott laws and regulations that may apply to Solenis. (See the Solenis [Trade Compliance policy, SL-POL-004.011](#)).
- **Financial integrity:** Suppliers must accurately and reliably report and record information regarding their business activities, company structure, financial situation and business performance in accordance with prevailing industry practices and applicable laws and regulations. Suppliers must also conduct business in a manner that is in line with any local tax laws that may apply to their operations and under no circumstances engage in conduct that can be characterized as “tax evasion” as further defined in Solenis’ Anti-facilitation of Tax Evasion policy, SL-POL-004.008.
- **Operating licenses:** Suppliers shall have appropriate licenses, registrations and certifications required to conduct business in the locations in which they operate.
- **Data privacy:** Suppliers shall have an established information security system and adequate protections relative to Solenis’ information, and the information of its customers, employees, and third parties, consistent with applicable law.
- **Intellectual property:** Suppliers must respect intellectual property rights and must maintain controls to safeguard Solenis’ name, logo, trademarks, confidential information and other intellectual property against unauthorized use, modification and damage.

### 3.2 Sourcing of conflict materials

Solenis supports the goal to end violence and human rights violations in regions of conflict. In order to ensure that our raw materials meet this goal, Solenis from time to time performs a self-assessment to determine our risk profile relative to any raw materials which may be considered as a conflict mineral.

- Solenis does not procure tin, tantalum, tungsten or gold that directly or indirectly finance or otherwise benefit armed groups and cause human rights abuses (Conflict Minerals), including from the Democratic Republic of the Congo or the adjoining countries (Covered Countries) in a manner which directly or indirectly finances or benefits armed groups in the Covered Countries.
- Solenis prohibits suppliers from sourcing Conflict Minerals and reserves the right to deny future business to suppliers that are unable to comply with the prohibition.
- Suppliers commit to abide by all applicable laws and regulations related to Conflict Minerals and agrees to provide all necessary information requested by Solenis concerning products supplied by Supplier to enable Solenis to complete its reasonable country of origin inquiries and due diligence with respect to Conflict Minerals.

### 3.3 Labor and employment-related standards

Solenis believes in treating all people with dignity and respect and is committed to protecting human rights. As a global company, Solenis is committed to maintaining safe and professional work environments where employees are free from violence, harassment and discrimination. We expect our suppliers to do the same.

- **Human Rights:** We are committed to the principles of the [Universal Declaration of Human Rights](#) and the United Nations' [Global Compact](#), and we expect our suppliers and business partners to share these principles. We seek to ensure that materials used in our products come from socially responsible sources. We do not tolerate, contribute to, or facilitate any activity that fuels conflict or violates human rights. (See the Solenis [Human Rights policy, SL-POL-004.030.](#))
- **Involuntary labor and human trafficking:** Suppliers must not engage in or support forced or compulsory labor as defined by the [International Labor Organization \(ILO\) Forced Labor Convention No. 29](#), including prison, bonded, indentured, slavery and human trafficking practices. All work performed must be voluntary and employees have the right to terminate employment with reasonable notice.
- **Child labor shall not be used:** There shall be no recruitment of child labor (work if which it is carried out is likely to harm the health, safety or morals of children). Companies shall develop or participate in and contribute to policies and programs which provide for the transition of any child found to be performing child labor to enable her or him to attend and remain in quality education until no longer a child (any person under the age of 15).

Children and young persons under 18 shall not be employed at night or in hazardous conditions. These policies and procedures shall conform to the provisions of the relevant ILO standards.

- Suppliers shall maintain awareness of, and comply with, all applicable laws and regulations, including but not limited to the U.S. Uyghur Forced Labor Prevention Act (“UFPLA”) and laws prohibiting forced and child labor in the supply chain.
- **Working hours:** Working hours must comply with national laws, collective bargaining agreements, whichever affords the greater protection for workers based on international labor standards.
- **Freedom of association and the right to collective bargaining:** Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. The employer adopts an open attitude toward the activities of trade unions and their organizational activities. Workers’ representatives are not discriminated against and have access to carry out their representative functions in the workplace. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.
- **Occupational health and safety (OHS):** Ensure that its personnel have received appropriate OHS training, strive to increase its employees’ and sub-contractors’ awareness of health and safety issues, and enhance safety culture through open communications.
- **Wages and benefits:** Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event, wages should always be enough to meet basic needs and to provide some discretionary income. All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid. Deductions from wages as a disciplinary measure shall not be permitted, nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.
- **Working conditions are safe and hygienic:** A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment. Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers. Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided. Accommodation, where provided, shall be clean, safe and meet the basic needs of the workers. The company observing the code shall assign responsibility for health and safety to a senior management representative.

- **Anti-harassment:** Suppliers are expected to create a work environment free from unwelcome conduct, whether verbal, nonverbal or physical, based on a person's age, disability, gender, genetic characteristic, national origin, race, color, religion, sexual orientation, veteran status or other protected group status. Harassment includes unwelcome sexual advances, requests for sexual favors, and other unwelcome verbal or physical conduct of a sexual nature. We do not tolerate harassment of our employees by anyone with whom our employees come into contact while conducting business. (See the Solenis [Anti-harassment policy, SL-POL-003.001.](#))
- **Anti-discrimination:** Suppliers shall not discriminate against employees based on race, color, national origin, religion, gender, age, disability, marital or partnership status, sexual orientation, veteran status, political opinions or any other personal characteristic protected by law in each locality. Any exclusions or preferences in the work environment made on these bases, which results in impaired equality, are prohibited. Suppliers are expected to hire employees based only on their job-related competence and, if requested, must be able to provide their company's written policy statement on the prevention of discrimination in the workplace.

### 3.5 Ethical standards

Solenis acts with integrity and honesty and always maintains the highest standards for business responsibility in accordance with laws and ethical principles. Solenis expects its suppliers to adhere to the same laws and principles.

- **Conflicts of interest:** Suppliers must do business in a way that is open, transparent and with the highest integrity. A potential conflict of interest exists if a supplier's employee or his or her family member has a close relationship with a Solenis employee who can make decisions which impact the supplier's business. Suppliers must disclose any conflicts of interest to Solenis prior to commencing business or whenever they arise. (See the Solenis [Conflicts of Interest policy, SL-POL-004.002.](#))
- **Diversity:** Solenis believes in the value of diversity and is committed to actively creating an environment where each team member feels empowered to learn, grow, and maximize his or her personal contribution. Celebrating the similarities and differences that shape each of us will continue to encourage innovative thinking and drive the kind of sustainable, competitive advantage that will help us grow and prosper for decades to come. We expect our suppliers to be inclusive and ensure that their employees and other stakeholders are always treated with dignity and respect. ([See the Solenis Supplier Diversity policy, SL-POL-008.011.](#))
- **Contribute to the positive social and economic development of the communities:**  
Supplier must:
  - Strive to contribute to the positive social and economic development of the communities impacted by its operations and minimize any negative impacts of its operations on those communities.
  - Strive to engage in meaningful dialogue with impacted communities.

### 3.4 Commitment to environment and product sustainability and safety

We expect our suppliers to be aligned with our commitment to sustainability, and as we strive to contribute, with good relationships, to the local communities in which Solenis operates, our suppliers are expected to do the same. (See the [Solenis Sustainability policy, SL-POL-005.001.](#))

- **Safeguarding the natural environment / social responsibility:** Solenis views the protection of biodiversity and the prevention of deforestation as critical to both environmental stewardship and long-term business success. We expect our suppliers to uphold the same high standards of integrity by aligning with the principles outlined in our [Deforestation and Biodiversity Policy, SL-POL-005.008.](#) Responsible sourcing and sustainable practices are non-negotiable expectations in our supply chain. In addition, we expect our suppliers to commit to protecting the human and natural environment through the efficient use of resources and actions designed to prevent pollution, promote efficient energy usage, recycling and the sustainable use of natural resources, minimize waste as well emissions to air, soil and water, and minimize negative impact on biodiversity loss, deforestation, climate change, and water scarcity. Upon request, Suppliers shall also disclose information regarding greenhouse gas reduction commitment and provide any further requested information connected with Solenis products.
- **Product safety and sustainability:** We expect suppliers to identify and look for opportunities to reduce any negative environmental impacts of their manufacturing and their products during their life cycle, ensure their products are made and developed to the highest ethical and safety standards and follow applicable laws and regulations on product safety, including communication of hazards and information about the safe use of chemicals if applicable.
- **Sourcing of materials:** Many organizations are required to track the use of certain minerals known as “conflict minerals.” We will actively work with suppliers and strive to ensure that any minerals incorporated into our products and / or processes come from conflict-free sources. Our suppliers ensure that they do not supply products that contain conflict minerals which directly or indirectly finance or benefit armed groups and cause human rights abuses. Suppliers are required to supply information about their use of these minerals in products sold to Solenis upon commencement of business or as requested. (See the Solenis [Conflict Minerals policy, SL-POL-008.012.](#))

### 4.0 Reporting

The supplier must immediately report any non-compliance with this SCoC to Solenis. The supplier and any of its employees may report their concerns confidentially to [supplierrisk@solenis.com](mailto:supplierrisk@solenis.com). Non-compliance with the SCoC can also be reported in accordance with Solenis’ Reporting policy. Solenis employees can share their concerns with direct or indirect managers or with the Office of Ethics and Compliance: [ethicsandcompliance@solenis.com](mailto:ethicsandcompliance@solenis.com).

Anonymous reports can be submitted via “Share Your Concern” on our intranet or [at this link](#) at [solenis.com/governance](https://solenis.com/governance).

### 5.0 Owner

Chief Procurement Officer

## **6.0 Exceptions**

Solenis follows the UN 10 Global Compact principles and exceptions apply to the suppliers that are participants of this Global pact.

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Protocol number:	SL-PRT-001.003	Revision number:	2
Original effective date:	May 6, 2024	Pages:	20
Revised effective date:	Sep 01, 2025	Reviewed date:	Dec 18, 2025

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## SOLENIS PROTOCOL Supplier Risk Assessment

### 1. Introduction

#### Overview and Background

Solenis uses Suppliers to provide products or services in support of its business operations. Such outsourced relationships may benefit Solenis by reducing costs, improving performance, increasing business competitiveness and providing access to specific expertise. However, Senior Management recognizes that Solenis' reliance on Supplier relationships presents many risks that must be identified, assessed, and managed. Failure to manage these risks can expose Solenis to financial losses, litigation, or other damage or may even impair Solenis' ability to service existing customer relationships or establish new ones.

#### Protocol Purpose

This Protocol aims to establish standards and guidance relating to Solenis' management of its Supplier relationships and the associated inherent / residual risks presented by those Supplier relationships and their fourth parties. These risks are present when Solenis engages with Suppliers to provide products and services directly for the benefit of its internal operations, employees, or customers.

Solenis recognizes that the purpose of Supplier risk management is not to eliminate all risks, but to provide the structural means to allow Solenis to identify, prioritize, manage, mitigate or respond to the risks associated with Supplier activities, while protecting the integrity of Solenis' brand and reputation, enhancing Supplier relationships, driving innovation, and building a robust value chain that can avoid potential disruptions.

Additionally, while this Protocol considers a broad scope of potential Supplier risks, it also serves to support our commitment to provide for or cooperate in remediation where Solenis activities have caused or contributed to adverse human rights impacts, in line with our Human Rights Policy.

### 2. Scope

- **Risk Domains in the Scope of Solenis' Supplier Risk Program**

Solenis' Supplier risk assessment process encompasses multiple dimensions to safeguard business continuity, regulatory compliance, and sustainable growth.

For more details on Risk Domains in scope, please refer to the table below:

Risk Domain	Risk Domain Definition
<b>Environmental, Social, and Governance (ESG) Risks</b>	Evaluation of risk concerning sustainability processes and practices, ethical business conduct, and regulatory adherence. This also considers environmental risks such as climate change impacts, water use, and waste reduction, as well as social risks such as employee health & safety and labor practices.
<b>Anti Bribery – Anti Corruption (ABAC) Risks</b>	Evaluation of the threats that Suppliers may offer or accept bribes to influence decisions, engage in corrupt practices to gain unfair business advantages, or violate laws like the U.S. Foreign Corrupt Practices Act (FCPA) or the UK Bribery Act
<b>Financial Stability</b>	Evaluation of the risk concerning Supplier solvency, financial health, and credit exposure affecting long-term viability.
<b>Cybersecurity Threats</b>	Evaluation of the risk concerning Supplier threats regarding data breaches, vulnerabilities in information technology infrastructure, and non-compliance with cybersecurity standards.
<b>Geopolitical Risks</b>	Evaluation of supply chain dependencies, trade restrictions, and geopolitical disruptions impacting supply chain and procurement.
<b>Catastrophic Event Risk</b>	Evaluation of Suppliers' resilience in the face of natural disasters, pandemics, and other high-impact disruptions.
<b>Regulatory and Compliance Restrictions</b>	Continuous tracking of legislative changes, trade sanctions, and compliance requirements affecting Supplier operations.
<b>Country Risk</b>	Evaluation of the potential adverse impacts on individuals, business operations, or supply chains resulting from the political, legal, social, economic, environmental or human rights conditions of a specific country. This includes risks associated with the locations where the Supplier or its sub-suppliers operate.
<b>Industry Risk</b>	Evaluation of the inherent risk level associated with the industry in which the Supplier operates, based on recognized international standards and frameworks.
<b>N-Tiering Risk</b>	Evaluation of risks that arise not just from Solenis' tier-one Suppliers, but from their Suppliers
<b>Operational Performance Risks</b>	Evaluation of risks associated with Suppliers' delivery reliability (On-Time In-Full, OTIF) and quality performance metrics to ensure consistent service levels.
<b>Supplier Worker and Community Risks</b>	Evaluation of protections for Suppliers' workers and relevant stakeholders in the supply chain (e.g., local and Indigenous communities), including appropriate grievance and feedback mechanisms.

Figure 1: Details of Risk Domains in scope

- **Suppliers in the Scope of Solenis' Supplier Risk Program**

- All direct Suppliers identified as **Strategic or Critical** as per Solenis' Supplier Relationship Management program ([Global Procurement and Responsible Sourcing Policy](#)) that have delivered products to Solenis on a regular basis for the past 12 months
- All new direct Suppliers onboarded through Solenis' Coupa Supplier Portal (CSP) with an estimated annual spend **≥\$1M**
- Warehousing Suppliers (Indirect Category) for continuous monitoring of Environmental, Health, and Safety compliance.

Additional Suppliers may be incorporated into the risk management program's scope as deemed necessary to address emerging business needs or to comply with evolving regulatory and compliance requirements.

### 3. Technology applied to Solenis' Supplier Risk Management Program

At Solenis, we recognize that technology plays a pivotal role in Supplier risk management. To enhance its Supplier risk program, Solenis leverages the following technologies:

- **Interos (Risk Identification and Screening Platform):** Supported by Artificial Intelligence (AI), the platform screens Suppliers in scope by leveraging external sources as well as private databases made available through partnerships. They also provide N-Tiering risk visibility to secure resilience along Solenis' supply chain.
- **Coupa (Risk Management Platform):** Through automated flows and integrations, the Coupa risk management platform enables continuous monitoring, scalability, due diligence processes, and compliance reporting capabilities for Suppliers.
- **Kharon (Human Rights Due Diligence):** This enables a deep dive into Sanctions Screening & Human Rights Risks such as forced labor in global supply chains.
- **Tableau (Risk Reporting):** This enables the continuous flow of risk data to Procurement Professionals and Solenis Leadership for risk monitoring purposes to make more informed decisions.

### 4. Internal References

- a) [SL-POL-008.007 - Supplier Code of Conduct](#)
- b) [SL-POL-004.030 - Human Rights Policy](#)
- c) [SL-POL-008.000 - Global Procurement and Responsible Sourcing Policy](#)
- d) [SL-PRT-001.002 - Supplier Onboarding Protocol](#)
- e) [SL-PRT-001.004 - Contract Lifecycle Management Protocol](#)

### 5. Supplier Risk Assessment Process

Solenis' Supplier risk management process is comprised of six elements as described below:

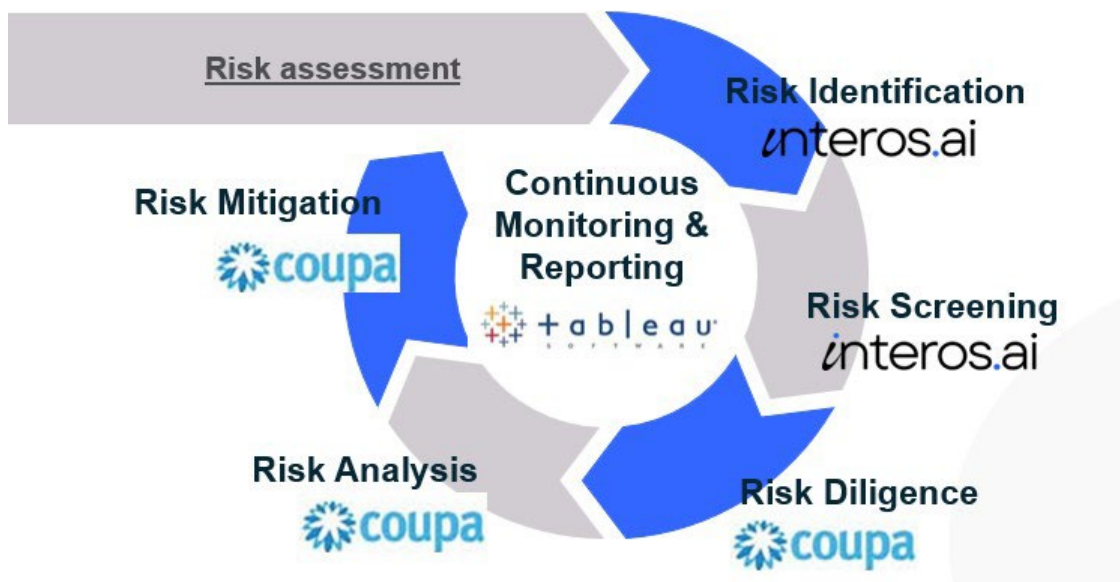


Figure 2: Supplier Risk Program Overall Process

Solenis’ Supplier Risk program assessments are part of the End-to-End Procurement lifecycle, from Supplier selection to onboarding, contracting, Supplier relationship management and ongoing monitoring for existing Suppliers.

Solenis applies a risk-based assessment approach that is proportionate to the nature and complexity of each Supplier business relationship. The process requires appropriate evidence to evaluate the effectiveness of internal controls.

Supplier assessments are primarily conducted through desk-based due diligence, including structured questionnaires, documentation reviews, and scoring methodologies applied via Solenis’ risk management platforms. These assessments are conducted using standards and methodologies from recognized industry frameworks and multi-stakeholder initiatives (see Appendix D – Abstract of ESG Risk Assessment Questionnaire for details). Where necessary, additional methods—such as on-site audits and interviews with key personnel—may be employed to validate and supplement the assessment when desk-based due diligence is insufficient or when elevated risks are identified, subject to feasibility.

Risk diligence, analysis, and mitigation steps are subject to and dependent on the outcome of the risk identification & screening process; therefore, they might not be necessary.

For more details on each step, outcome, and expected corrective actions along with the process, please refer to Appendix B.

## 6. Process Stakeholders: Roles & Responsibilities

At Solenis, mitigating Supplier risks requires a structured approach that clearly defines responsibilities and fosters collaboration across key functions. To ensure accountability and proactive risk management, Solenis established a framework that assigns distinct roles based on the different risk domains in scope, promoting cross-functional collaboration and engagement.

By defining responsibilities and reinforcing collaboration, we strengthen our ability to navigate Supplier risks, protect our operations, and uphold industry-leading standards in risk management. Each function plays an essential role, and through shared accountability, Solenis can ensure sustainable and long-term Supplier resilience. For more details on Roles and Responsibilities along the process, please refer to the RASCI matrix below:

RASCI Matrix - R - Responsible   A - Accountable   S - Support   I - Informed   C - Consulted										
Process Stakeholders										
Risk Domain in Scope	Corporate Sustainability Team	Ethics & Compliance Team	Information Technology Team	Legal Team	Procurement Professionals	Supplier Risk Management Team	Sustainable Procurement Team	Trade & Compliance Team	EHSS Team	Suppliers
ESG & ABAC	A (Supplier Diligence) S (Supplier Mitigation)	A (Supplier Diligence) A (Supplier Mitigation)	-	S (Support in Contract Review & Negotiation to mitigate risks across all domains)	S (Supplier Mitigation)	-	A (Supplier Diligence) A (Supplier Mitigation)	-		R (Responsible for filling Diligence Questionnaire and Executing Risk Mitigation Plans)
Financial	-	-	-		S (Supplier Mitigation)	A (Supplier Diligence) A (Supplier Mitigation)	-	-		
Cybersecurity	-	-	A (Supplier Diligence) A (Supplier Mitigation)		S (Supplier Mitigation)	-	-	-		
Geopolitical	-	-	-		A (Supplier Diligence) A (Supplier Mitigation)	-	-	-		
Catastrophic	-	-	-		S (Supplier Mitigation)	A (Supplier Diligence) A (Supplier Mitigation)	-	-		
Operational Performance	-	-	-		A (Supplier Diligence) A (Supplier Mitigation)	-	-	-		
N-Tiering	-	-	-		S (Supplier Mitigation)	A (Supplier Diligence) A (Supplier Mitigation)	-	-		
Trade Compliance & Restrictions	-	-	-		S (Supplier Mitigation)	-	-	A (Supplier Diligence) A (Supplier Mitigation)		
EHSS	-	-	-		S (Supplier Mitigation)	-	-		A (Supplier Diligence) A (Supplier Mitigation)	

Figure 3: Roles & Responsibility Rasic Matrix

## 7. Supplier Risk Assessment: Onboarding

Solenis considers the Supplier onboarding process a critical component in establishing sustainable growth and fostering reliable partnerships. The full onboarding procedure is detailed in the [SL-PRT-001.002 – Supplier Onboarding Protocol](#)

As part of the **Solenis Supplier Risk Management Program**, the onboarding process includes a comprehensive risk assessment for all direct Suppliers within scope. This assessment ensures that Suppliers entering into a business relationship with Solenis are appropriately screened, evaluated, and classified based on their potential risk exposure.

This initial risk evaluation is a foundational step in the Supplier Risk Management lifecycle, enabling the implementation of appropriate controls from the outset and supporting long-term risk mitigation strategies.

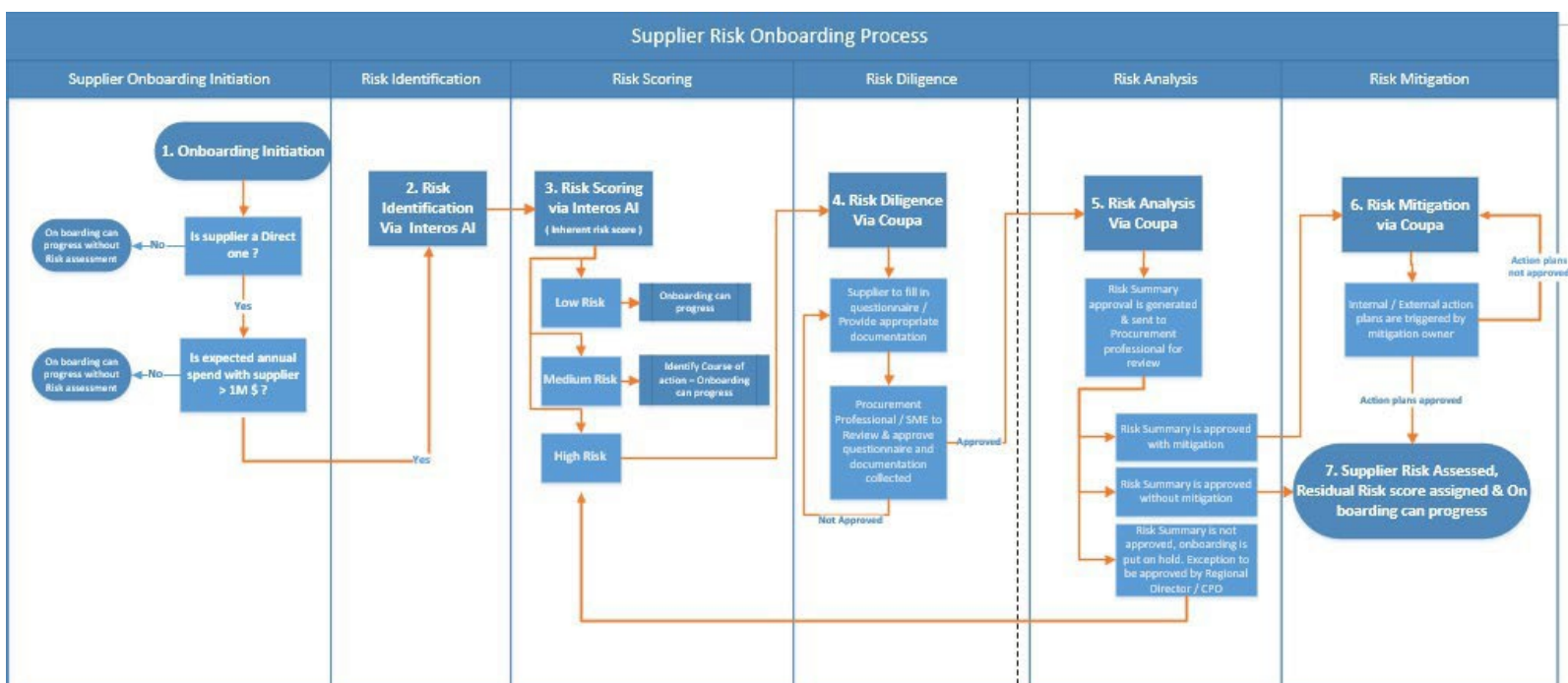


Figure 4: Risk assessment process for onboarding new Suppliers in scope

Below are the details of each step of the Supplier Risk Assessment onboarding process for new Suppliers in scope:

Steps	Risk Process Pointers
<b>1. Supplier onboarding Initiation</b>	New Supplier request is initiated by Procurement Professionals via Coupa Supplier Portal (CSP).
<b>2. Risk Identification</b>	If the New Supplier is a Direct Supplier with an expected annual spend >\$1M, the Supplier is enrolled into Interos for risk identification and screening.

<b>3. Risk Screening</b>	Screening process assigns a risk score (inherent risk score) to Suppliers in scope, which is calculated by combining scores of risk domains in scope and country risks. a) If all risk domains show as low risk, no further steps are required, and onboarding can progress without any additional risk due diligence.
	b) If all risk domains show as medium risk, appropriate actions will be identified and implemented in due course, following a thorough evaluation, including the relevance of the Supplier for Solenis business. In the meanwhile, onboarding can progress without any additional risk due diligence.
	c) If any of the risk domains show as high or extreme risk, additional Supplier due diligence is automatically triggered by Solenis risk management platform, and the Supplier is flagged as “New Supplier – Diligence required”.
	Regardless of the risk screening outcome, all Direct Suppliers located in critical or high-risk countries (as defined in Appendix C), operating in high-risk industries (as defined in Appendix C), or classified as Strategic Chemical suppliers, will be subject to an ESG due diligence review every 12 months, or sooner if there are significant business changes as outlined in Section 8.
<b>4. Risk Diligence</b>	Suppliers fill in questionnaires, and Procurement professionals / SMEs will review and approve / reject them to ensure the appropriate required information / documentation is collected, providing a recommendation for mitigation if necessary.
	For more details on Roles & Responsibilities, please refer to section 6.
	For more details on Diligences, please refer to Appendix D
<b>5. Risk Analysis</b>	Once all the questionnaires for a specific Supplier are completed and approved, Solenis’ Risk Management platform Coupa generates a Risk Summary Approval that is sent to a Procurement Professional (Supplier Owner) for review.
	a) If the Risk Summary is approved without mitigation, the residual risk is calculated by the platform, onboarding continues, the flag is removed, and the Supplier is included in the ongoing due diligence process.
	b) If the Risk Summary is approved with mitigation, a notification is sent to the Risk Mitigation Owner (as defined in the responsibility matrix in Figure 3, section 6) to initiate it.
	c) If the Risk Summary is not approved, Supplier onboarding is put on hold, and the risk Exceptions need to be approved in writing by the Regional Category Director and / or Chief Procurement Officer.
<b>6. Risk Mitigation</b>	Risk Mitigation Owner triggers internal or external action plans to manage the risk, using Coupa. Once mitigation plans are completed and approved, a health score (composite risk score) is assigned to the Supplier and onboarding can successfully progress. In parallel, the flag is removed, and Supplier is included in the ongoing due diligence process.

### Supplier Noncompliance

If any Supplier in scope fails to comply with the corrective action plans or otherwise fails to address action plans within agreed timelines, Suppliers can be put on “New Business Hold”. Procurement Professionals might also decide, after accurate evaluation, to identify alternative sources and stop the business relationship with Suppliers from meeting minimum requirements. In cases where the Supplier demonstrates persistent noncompliance, refuses to cooperate, or is involved in a material breach of Solenis policies, Solenis reserves the right to cancel outstanding orders, suspend future orders, and / or terminate the main Supplier contract.

## Human Rights - secondary level of due diligence

Any Supplier(s) that is identified with a potential risk of Human Rights violations during the initial screening or diligence process will prompt a detailed investigation through Kharon.

This additional assessment enables Solenis to assess Tier 1 Supplier risks as well as risks within the extended supply chain. This assessment occurs in two steps:

- a. Isolating Key Pathways: The first step involves identifying the key pathways from each source of risk. These pathways represent the connections and relationships that link an entity or individual to a particular risk.
- b. Weighting Relationships: Once the key pathways are isolated, the relationships within those pathways are weighted. This weighting process considers various factors such as:
  - Relationship Type: nature of the connection (e.g., ownership, control, financial transactions).
  - Direction of the relationship (e.g., direct or indirect involvement).
  - Distance: proximity of the relationship (e.g., first-degree connections versus more distant connections).

After weighting the relationships, an aggregate score is generated to reflect the overall exposure to a specific source of risk. Scoring methodology ranges from 0 to 100. Higher scores reflect stronger risk exposure, featuring direct and significant connections such as ownership and control. Lower scores reflect more moderate or indirect risk exposure.

If a Supplier has a score > 60, the Supplier will be contacted to gather additional details and evidence for a thorough risk assessment.

Where elevated risks remain unresolved or desk-based diligence is unable to verify Supplier practices, an on-site assessment or targeted engagement with the Supplier may be initiated to support further validation.

Where necessary, a dedicated mitigation risk management plan will be developed and implemented to address the identified risk(s). Should the Supplier fail to comply with the mitigation risk management plan, Solenis reserves the right to suspend the allocation of new business until the issue is fully resolved.

Overall Grade	Overall Score
Low Risk (Best in Class)	>80 and ≤100
Medium Risk (Trusted)	> 20 and ≤80
High Risk	≤20

## 8. Periodic Risk Assessments and Ongoing Monitoring

A Supplier's risk profile may change over time due to numerous external factors. Solenis Supplier Risk Management Program continuously monitors existing Suppliers' risks and performance with the aim of ensuring their compliance with applicable regulations and internal policies, creating a resilient supply chain.

**Scope:** This section applies to all direct Suppliers classified as Strategic or Critical as part of Solenis' Supplier Relationship program.

## Ongoing Monitoring process description

- Inherent Risk Scores are continuously monitored through Interos .
- Due diligence is initiated through risk-based automated workflows in Coupa under prescribed intervals for periodic reviews, but as a general rule, Suppliers will not go through the same diligence more than once a year.
- The ongoing monitoring process follows the same steps from 2 to 5 as shown in the 'New Supplier Risk Assessment Onboarding Process'(Figure 4).
- If any Supplier in scope fails to comply with the corrective action plans or otherwise fails to address action plans within the agreed time, Suppliers will be put on a new business hold. Procurement Professionals might also decide, after evaluation, to identify alternative sources of supply. For action plans related to ESG and human rights risks, if suppliers do not demonstrate progress towards their action plans within 45 days, Solenis will take escalatory steps and may decide to place the supplier on a new business hold or identify alternative sources of supply.
- For Human Rights due diligence, the same approach reported in section 7 is followed for Suppliers in scope.

## Annual Third-party Verification

Solenis will engage an independent third-party service provider to conduct an annual verification of Supplier screening data. This verification will assess the accuracy, completeness, and consistency of risk scoring inputs and outputs. The results will be reviewed by Procurement Excellence and incorporated into continuous improvement efforts within the Supplier Risk Management Program.

## Additional Risk Assessment as Necessary

Additional periodic assessments are considered under the following circumstances:

- Significant changes in a Supplier's business practices, financial position, reputation, or similar
- Increased reliance on the Supplier and its services
- Changes in applicable law or regulations impacting the Supplier's product
- Increased media attention, negative publicity, or industry scrutiny related to the Supplier
- Regulatory enforcement actions or industry-related guidance impacting the Supplier relationship
- Known instances of complaints or whistleblower reports from Supplier workers or community stakeholders.

## 9. Reactive Risk Management

While the primary goal of the Solenis Supplier Risk Program is to proactively manage risks and minimize operational impact, we recognize that certain events cannot be fully anticipated. Reactive risk management addresses unforeseen disruptions such as force majeure, supplier

bankruptcy, poor supplier delivery / quality performances, unplanned extraordinary maintenance, or natural disasters occurring in regions with historically low catastrophic risk.

To effectively mitigate these risks, Solenis aims to standardize the threat management and reporting process and evaluate supplier performance based on their readiness and responsiveness to such events, ensuring that suppliers are assessed not only on their ability to prevent disruptions but also on how effectively they respond when they occur.

The Procurement team is responsible for reporting incidents and managing mitigation action plans in close collaboration with internal stakeholders and suppliers. Coupa supports this process by enabling structured threat tracking, generating reactive risk reports, and deploying targeted supplier diligence questionnaires to assess preparedness and response capabilities. This ensures that even in reactive scenarios, Solenis maintains operational continuity and informed decision-making.

## 10. Use and maintenance of this protocol

This protocol is applicable for all Solenis' employees, independent contractors, and consultants. This protocol will be reviewed at least once per year by the Procurement Excellence team.

Solenis Leadership Council is responsible for oversight of Solenis' ESG strategy, including Supplier-related risks. This includes reviewing the effectiveness of the Supplier Risk Management Program in identifying and mitigating ESG risks across the supply chain and ensuring alignment with Solenis' sustainability commitments and policies.

## 11. Owner

Procurement Excellence Director - Global Procurement

## 12. Revision History

This is a history of notable changes to this protocol

Effective date	Section	Description of change
May 06, 2024	All	Document Creation
Dec 16, 2024	7; 8	Added deep dive on Human Rights Risk Due Diligence
Dec 3, 2025	All	Document revision following new risk program

## Appendix A – Definitions

<b>Continuous Monitoring</b>	The practice of regularly tracking Supplier performance, risk indicators, regulatory changes, and media alerts to detect emerging issues in real time
<b>Supplier</b>	Third-party entity providing products and/or services to Solenis. This includes Direct Suppliers, Subcontractors, Consultants & Indirect Suppliers
<b>Direct Supplier</b>	Third-party entity providing Solenis with purchasing materials, goods, or services that are directly incorporated into a final product or service offering (e.g., raw materials and components that Solenis requires to manufacture its products)
<b>Country Risk</b>	Evaluation of the potential adverse impacts on individuals, business operations, or supply chains resulting from the political, legal, social, economic, environmental or human rights conditions of a specific country. This includes risks associated with the locations where the Supplier or its sub-suppliers operate.
<b>Indirect Supplier</b>	Third-party entity supplying Solenis goods or services that support operations through non-core functions or services not directly related to product or service delivery (also referred to as "non-production" Suppliers)
<b>Industry risk</b>	Evaluation of the inherent risk level associated with the industry in which the Supplier operates, based on recognized international frameworks.
<b>SMEs (Subject Matter Experts)</b>	Individuals with in-depth expertise in a particular area (e.g., InfoSec, Legal, Compliance) who lead / support Supplier Diligence evaluations and mitigation plan execution.

## Appendix B – Supplier Risk Assessment Process Flow Details

Risk Process	Definition	Outcome	Correction Action Plan
1. Risk Identification	<p>Solenis employs a continuous, proactive process to identify and document potential risks that may affect Supplier performance or disrupt the supply chain. This process leverages Interos AI platform to monitor news sources and aggregate risk data from external risk scoring providers, enabling early detection and mitigation of vulnerabilities before they escalate.</p>	-	-
2. Risk Screening	<p>Solenis evaluates the nature and potential severity of risks to categorize Suppliers based on their inherent risk levels. Each in-scope Supplier is assigned a numerical score and classified into one of the following categories:</p> <ul style="list-style-type: none"> <li>- <b>Extreme Risk</b> – High-impact threats requiring action</li> <li>- <b>High Risk</b> – Significant vulnerabilities that must be addressed</li> <li>- <b>Medium to Low Risk</b> – Managed risks requiring ongoing monitoring.</li> </ul> <p>The screening is based on a proprietary methodology developed by Interos and reflects each Supplier’s inherent risk profile.</p> <p>Regardless of the risk screening outcome, all Direct Suppliers located in critical or high-risk countries (as defined in Appendix C), operating in high-risk industries (as defined in Appendix C), or classified as Strategic Chemical suppliers, will be subject to an ESG due diligence review every 12 months, or sooner if there are significant business changes as outlined in Section 8.</p>	<p><b>Risk Screening Outcome:</b> All Suppliers within scope are assigned an overall inherent risk score through Solenis’ risk screening platform, Interos. In addition to the aggregate score, Suppliers receive individual scores across specific risk domains, enabling a more granular assessment of potential vulnerabilities.</p>	<p><b>Corrective Action Plan:</b> When a Supplier receives a high or extreme risk score in any specific domain, a targeted due diligence process is automatically triggered through the Solenis Risk Management platform, Coupa.</p> <p>Each risk domain is supported by pre-built, domain-specific questionnaires, which are collaboratively developed by Category Leads, the Supplier Risk team, and Subject Matter Experts (SMEs). This tailored diligence ensures that elevated risks are thoroughly investigated and addressed.</p>
3. Risk Diligence	<p>To further assess identified inherent risks, Suppliers are required to complete pre-built questionnaires tailored to specific risk domains. These questionnaires are designed to collect detailed information and support deeper analysis.</p>	<p><b>Risk Diligence Outcome:</b> Suppliers are required to complete domain-specific questionnaires by providing detailed responses and uploading relevant supporting documentation, such as ISO certifications and evidence of regulatory compliance, as specified within each risk domain.</p> <p>All submissions are reviewed and approved in accordance with the responsibility matrix outlined in Figure 3, section 6. Completed questionnaires and supporting documents are securely stored within Solenis’ technology platform, serving as a documented record of compliance and due diligence.</p>	<p><b>Corrective Action Plan:</b> To ensure the timely completion of required assessments, automated reminders are sent to Suppliers until all domain-specific questionnaires are fully completed.</p> <p>Subject Matter Experts (SMEs) are responsible for reviewing submissions and have the authority to reject any questionnaire if the information provided is incomplete, inconsistent, or does not meet the specified requirements. Rejected submissions are returned to Suppliers for revision and resubmission, ensuring that all data meets Solenis’ compliance and quality standards.</p>

		<p>This step is entirely managed in Coupa.</p>	
<p>4. Risk Evaluation</p>	<p>Once diligences have been analyzed and approved, risks are evaluated to determine whether mitigation actions are required. This evaluation is conducted through a risk summary approval, which is automatically generated by Coupa.</p> <p>The assessment ensures that appropriate measures are taken based on the severity and potential impact of each identified risk, supporting proactive risk management and alignment with Solenis' compliance standards.</p>	<p><b>Risk Evaluation Outcome:</b> The designated Risk Evaluator—as defined in the responsibility matrix in Figure 3, section 6—is responsible for determining the appropriate outcome of the Supplier risk summary. This decision is made in consultation with Subject Matter Experts (SMEs) and considers multiple factors, including Supplier segmentation, geographic location, risk type, and the evidence collected during due diligence.</p> <p>Based on this evaluation, one of the following outcomes is assigned:</p> <ul style="list-style-type: none"> <li>• <b>Approved without Mitigation</b> – No further action required</li> <li>• <b>Approved with Mitigation</b> – Mitigation measures must be implemented</li> <li>• <b>Not Approved</b> – Risk summary is rejected and requires further action</li> </ul> <p>Upon completion, the technology platform calculates the residual risk using predefined criteria aligned with Solenis' risk appetite.</p> <p>This step is entirely managed in Coupa.</p>	<p><b>Corrective Action Plan:</b> If the risk summary is <b>approved</b> with mitigation, the Category Lead (CL) or SME will initiate a mitigation plan and define a dedicated action plan within the technology platform.</p> <p>If the risk summary is <b>not approved</b>, the Supplier will be formally notified and placed under a new business hold, meaning no new business can be awarded until the risk is mitigated.</p>
<p>5. Risk Mitigation</p>	<p>Solenis develops and implements targeted strategies to reduce the likelihood or impact of key risks. These mitigation plans are designed to address specific vulnerabilities and ensure continuity and resilience across the supply chain.</p>	<p>The designated Risk Mitigation Owner (as defined in the responsibility matrix in Figure 3, section 6), in consultation with SMEs, selects the appropriate mitigation strategy based on the “4Ts” framework and provides a business justification for the decision:</p> <ul style="list-style-type: none"> <li>- <b>Transfer</b> – Shift the risk through contracts or insurance</li> <li>- <b>Tolerate</b> – Accept and monitor low-priority risks</li> <li>- <b>Terminate</b> – Eliminate the source of the risk</li> <li>- <b>Treat</b> – Apply controls or actions to reduce risk impact</li> </ul>	<p><b>Corrective Action Plan:</b> Detailed action plans are assigned to relevant internal and external stakeholders, including Suppliers, with defined completion dates based on the severity of the risk identified. Automated reminders are issued through Solenis' technology platform, and all action plans are retained within the system as evidence of compliance. For action plans related to ESG and human rights risks, if suppliers do not demonstrate progress towards their action plans within 45 days, Solenis will take escalatory steps and might decide to place the supplier on a new business hold or</p>

		<p>A mitigation playbook is available to guide decision-making.</p> <p>This step is entirely managed in Coupa.</p>	<p>identify alternative sources of supply.</p>
<p><b>6. Continuous Monitoring</b></p>	<p>Solenis continuously monitors key risk indicators and Supplier performance criteria to ensure timely identification of emerging risks and to maintain alignment with performance expectations.</p>	<p><b>Outcome:</b> Solenis employees have continuous visibility into both the inherent and residual risk scores of all Suppliers enrolled in the program. Email alerts can be activated to notify users of any increase in a Supplier's inherent risk posture.</p> <p>Recurring due diligence is automatically triggered for Solenis' direct strategic Suppliers and for indirect Suppliers subject to Environmental, Health, and Safety (EHS) compliance requirements.</p>	<p><b>Corrective Action Plan:</b> Risk-based due diligence and mitigation plans can be manually triggered through the technology platform to ensure that contracted engagements align with Solenis' strategic and financial objectives, data security and privacy standards, and operational and contractual requirements.</p>

## Appendix C – Country & Industry Risk Classification

### **Country Risk Classification**

This classification is based on multiple international standards, guidance, and legislation to assess countries' exposure to human rights, labor, and supply chain risks. These sources include:

- OECD Conflict-Affected and High-Risk Areas
- Swedish National Agency for Public Procurement's Hållbar Upphandling risk assessment tools
- UK Foreign, Commonwealth & Development Office Human Rights Priority Countries List
- Global Rights Index by the International Trade Union Confederation (ITUC)

These sources are reviewed to identify patterns of concern across countries. Countries are grouped into the following categories:

#### **Critical Risk Countries:**

Countries consistently flagged across multiple sources for severe human rights violations, conflict involvement, and systemic governance issues. These countries pose significant risks for supply chain operations and require the highest level of due diligence.

#### **High Risk Countries:**

Countries with elevated risk across several issue areas and sectors. Suppliers operating in these countries require enhanced due diligence and ongoing monitoring.

#### **Medium Risk Countries:**

Countries with moderate levels of risk, where concerns may be sector-specific, emerging, or inconsistently reported. Suppliers operating in these countries warrant targeted due diligence.

#### **Low Risk Countries**

Countries are not flagged in any of the listed sources, suggesting minimal risk exposure under current assessments. These countries are typically considered safe for sourcing and operations, though ESG compliance and reputational risks should still be managed.

The Overall Risk Level provided in the table below reflects a consolidated view of each country's risk profile, as of October 2025.

Country	OECD CAHRAs Risk	Hallbar Upphandling Risk	UKFCDO Priority O:lundrlj!	FTUCRa (202,1)	Overall Risk Level
	✓ High	✓ High	✓ Listed	5+	Critical
	✓ High	✓ High	✓ Listed	5+	Critical
	✓ High	✓ High	✓ Listed	5+	Critical
	✓ High	✓ High	✓ Listed	5+	Critical
	✓ High	✓ High	✓ Listed	5	Critical
	✓ High	✓ High	✓ Listed	5	Critical
China	✓ High	✓ High	✓ Listed	5	Critical
Nigeria	✓ High	✓ High	✓ Listed	4	Critical
Pakistan	⚠ Moderate	✓ High	✓ Listed	4	High
Saudi Arabia	⚠ Moderate	✓ High	✓ Listed	4	High
Bangladesh	⚠ Moderate	✓ High	✓ Listed	5	High
Egypt	⚠ Moderate	✓ High	✓ Listed	5	High
Turkey	⚠ Moderate	✓ High	✓ Listed	3	High
Cambodia	⚠ Moderate	✓ High	⚠ Not Listed	4	High
Vietnam	⚠ Moderate	✓ High	⚠ Not Listed	4	High
Ethiopia	✓ High	✓ High	⚠ Not Listed	5	High
Ukraine	✓ High	✓ High	✓ Listed	4	High
India	⚠ Moderate	⚠ Medium	⚠ Not Listed	2	Medium
Indonesia	⚠ Moderate	⚠ Medium	⚠ Not Listed	3	Medium
Brazil	⚠ Moderate	⚠ Medium	⚠ Not Listed	4	Medium
Mexico	⚠ Moderate	⚠ Medium	⚠ Not Listed	4	Medium
South Africa	⚠ Moderate	⚠ Medium	⚠ Not Listed	3	Medium
United States	✗ Not Listed	⚠ Medium	✗ Not Listed	2	Medium
Philippines	⚠ Moderate	⚠ Medium	✓ Listed	4	Medium
Thailand	⚠ Moderate	⚠ Medium	⚠ Not Listed	4	Medium
Colombia	⚠ Moderate	⚠ Medium	✓ Listed	4	Medium
Kenya	⚠ Moderate	⚠ Medium	✓ Listed	4	Medium
Italy	✗ Not Listed	✗ Low	✗ Not Listed	i	LOW
Switzerland	✗ Not Listed	✗ Low	✗ Not Listed	i	LOW
Norway	✗ Not Listed	✗ Low	✗ Not Listed	i	LOW
Canada	✗ Not Listed	✗ Low	✗ Not Listed	i	LOW
Finland	✗ Not Listed	✗ Low	✗ Not Listed	i	LOW
Germany	✗ Not Listed	✗ Low	✗ Not Listed	i	LOW
Netherlands	✗ Not Listed	✗ Low	✗ Not Listed	i	LOW
Japan	✗ Not Listed	✗ Low	✗ Not Listed	i	LOW
Australia	✗ Not Listed	✗ Low	✗ Not Listed	i	LOW

- ✓ = Explicitly flagged by the framework
- ⚠ = High Risk, a concern for the company's financial health
- ✗ = Not Flagged
- High Risk = Flagged by most indicators or index score 61-79
- Medium Risk = Flagged by some indicators or index score 40-59
- Low Risk = Significant human rights impacts, index score <41

## Industry Risk Classification

This classification provides a comparative analysis of industry-based risks informed by international standards, guidance, and legislation. These sources include:

- OECD Conflict-Affected and High-Risk Areas
- Swedish National Agency for Public Procurement’s Hållbar Upphandling risk assessment tools
- UK Modern Slavery Act guidance
- ILO Standards
- German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG)

Each industry is assessed against these sources, culminating in a Unified Sector Risk Score, expressed on a scale from 0 to 100. This score reflects the overall risk exposure of each industry in relation to human rights, labor practices, and supply chain vulnerabilities.

### High-Risk Industries (Unified Score > 85):

These industries consistently score high across all standards, indicating elevated risk levels due to factors such as complex global supply chains, labor exploitation, and environmental impact.

### Moderate-Risk Industries (Unified Score 65–85):

These industries show moderate risk, often due to technological complexity, subcontracting, or exposure to vulnerable labor markets. These industries still face challenges, particularly in logistics and service delivery.

### Low-Risk Industries (Unified Score < 65):

These industries are considered lower risk but may still face scrutiny under specific standards or in certain jurisdictions.

Industries	OECD CAHRAs	Hållbar Upphandling	UK Modern Slavery act guidance	ILO	German Supply Chain Act	Unified Sector Risk Score
Extractives (Mining, Oil & Gas)	95	90	90	95	90	92
Apparel & Textiles	85	90	90	95	85	89
Agriculture & Food	85	90	90	95	85	89
Electronics & ICT	85	75	70	85	80	79
Construction & Infrastructure	75	85	70	95	80	81
Chemical Industry	75	70	75	80	75	75
Transportation & Logistics	65	70	70	80	70	71
Tourism & Hospitality	65	70	70	80	70	71
Healthcare & Pharma	60	70	65	60	65	64
Technology Platforms	50	40	60	60	60	54
Finance & Insurance	40	40	40	40	40	40

**Appendix D – Abstract of ESG Risk Assessment Questionnaire**

<b>ESG Risk Assessment Questionnaire</b>		
<b>Component</b>	<b>Component Summary of Questions</b>	<b>Weight %</b>
<b>General Information and Sustainability</b>	<p>ESG Components covered here help identify Sustainability certifications and requirements of Suppliers (EcoVadis, Carbon Disclosure Program [CDP], S&amp;P Global ESG Score, CSRD, Responsible Purchasing policy are some of the major questions covered through this component.</p> <p>Sustainability Components prompts the Supplier to answer about their alignment with UN Global Compact Principles, any statement or commitment for Corporate Social Responsibility and if they have published a Sustainability report to track ESG progress achieved so far.</p>	<b>20%</b>
<b>Occupational Health &amp; Safety (OH&amp;S)</b>	<p>OH&amp;S Component outlines key practices related to occupational health and safety across operations, products, and services. It covers the existence of formal OH&amp;S policies, communication in local languages, regular assessments and improvements, employee risk evaluations, and monitoring of health metrics. It also addresses training programs, provision of personal protective equipment (PPE), ISO 45001 certification, and any reported breaches within the last three years.</p>	<b>10%</b>
<b>Environment</b>	<p>The environment component outlines the organization’s commitment to environmental responsibility across key areas, including waste disposal, recycling, energy use, transportation, deforestation, biodiversity, packaging, emissions, water management, resource and chemical use, and ozone-depleting substances. It also addresses the use of Environmental Management Systems (EMS), relevant certifications (e.g., ISO 14001, ISO 50001, FSC, RSPO), and Supplier environmental evaluations. Additionally, it highlights the importance of transparency in the supply chain, adherence to environmental legislation, and collaboration opportunities to reduce environmental impact and carbon footprint.</p>	<b>15%</b>
<b>Labor Standards &amp; Human Rights</b>	<p>The Labor Standards &amp; Human Rights component outlines the organization’s commitment to upholding international labor standards and human rights. It includes policies on working conditions, prohibition of child and forced labor, freedom of association, fair wages, and decent work environments, as well as grievance and feedback mechanisms for workers and affected stakeholders. It also addresses Supplier risk assessments, training and support for sustainable practices, conflict minerals, and relevant certifications such as SA 8000. The organization ensures compliance through documented processes, transparency, and continuous improvement across its operations and supply chain.</p>	<b>20%</b>

<b>Equity &amp; Diversity</b>	<p>Equity &amp; Diversity component outlines the organization’s commitment to promoting a diverse, inclusive, and respectful workplace. It includes procedures to prevent discrimination and harassment, measures to monitor workforce diversity, and initiatives to support underrepresented groups through training, development programs, and inclusive networks. These efforts aim to foster an equitable environment for all employees.</p>	<b>2%</b>
<b>Supplier Diversity Program</b>	<p>Supplier Diversity Component highlights the need to gain awareness into Supplier efforts of including Diverse Suppliers in their portfolio and if they have an ongoing Supplier Diversity program within their organization.</p>	<b>2%</b>
<b>Supply Chain and Supplier Code of Conduct</b>	<p>Supply Chain component outlines the organization’s expectations for Suppliers regarding ethical labor practices, non-discrimination, health and safety, and sustainability. It includes adherence to a formal Supplier Code of Conduct, Supplier compliance monitoring, sustainability performance assessments, and on-site audits. The organization also supports diverse Supplier engagement and requires confirmation of no direct or indirect business ties to entities operating in countries or regions with geopolitical risks.</p>	<b>20%</b>
<b>Community</b>	<p>Community Component outlines the organization’s commitment to charitable initiatives and community engagement. It includes support for employee volunteering during work hours and openness to collaborating with partners on social impact programs.</p>	<b>1%</b>
<b>Business Conduct</b>	<p>Business Conduct component outlines the organization’s commitment to ethical business practices, including the implementation of a formal Code of Conduct, a whistleblowing mechanism for stakeholders, a clear stance on political donations, and responsible management of proprietary information and intellectual property.</p>	<b>10%</b>

## Appendix E – Risk Scoring overview

Solenis evaluates supplier risk using a composite Supplier Health Score generated through the Coupa risk management platform. This score integrates three key criteria: inherent risk, the residual risk, and performance KPIs associated with each Supplier (Figure 5).

$$\text{Supplier Health score} = \text{Inherent Risk Score} + \text{Residual Risk Score} + \text{Supplier Performance KPIs}$$

Figure 5 : Solenis Risk Scoring Overview

The **Supplier Health Score** reflects the risk that remains after due diligence, risk mitigation measures, and controls have been applied. It is continuously monitored and calculated through the Coupa risk management platform using 4 factors:

- Supplier Inherent Risk Score
- Supplier Diligence / Mitigation Scoring
- Supplier Performance Score
- Coupa Community Score

The Supplier Health Score integrates both qualitative and quantitative factors to ensure a balanced, consistent approach that aligns with Solenis' risk appetite.

Overall Grade	Overall Score
Low Risk (Best in Class)	>80 and ≤100
Medium Risk (Trusted)	>20 and ≤80
High Risk	≥0 and ≤20

**Inherent risk** represents the level of exposure stemming from a Supplier's role, geography, industry, or service type before any mitigating controls are considered. It provides a baseline understanding of potential vulnerabilities. The Inherent Risk Score is continuously monitored and calculated through Interos, Solenis' risk scoring platform, which owns the calculation methodology. Risk level definition is applicable to the overall score (I-score) and to single risk domains. Risk Level scoring is aligned to the following methodology and visible under each Supplier profile, within both the Interos and Coupa platforms.

Overall Grade	Overall Score
Low Risk	>70 and ≤100
Medium Risk	>55 and ≤70
High Risk	>20 and ≤55
Extreme Risk	≤20

**Residual risk** represents the level of risk that remains after a Supplier has completed all required due diligence activities, SMEs have reviewed and approved the submissions, and the

Procurement team has validated the Supplier Risk Summary. Residual risk is automatically calculated by Coupa based on the information provided during the risk assessment.

- Each risk domain (e.g., financial, ESG, compliance) is evaluated through a diligence score.
- These scores are then combined using a weighted system, where each domain contributes differently to the overall risk profile.
- The result is a residual risk score, which reflects the remaining level of risk after considering all the available data.

Each Supplier’s risk level is scored according to a standardized methodology, which ensures consistency and transparency across evaluations. The resulting score is visible within the Supplier’s profile in the Coupa platform, enabling stakeholders to make informed decisions based on the Supplier’s risk posture.

Overall Grade	Overall Score
Low Risk	≥0 and ≤30
Medium Risk	>30 and ≤45
High Risk	>45 and ≤80
Extreme Risk	≥80 to ≤100

**Supplier Performance KPIs (Key Performance Indicators)** are continuously monitored using key indicators that assess reliability, responsiveness, and consistency. A primary metric utilized is **On-Time In-Full (OTIF)**, which measures the percentage of deliveries that are received both on the agreed delivery date and in the correct quantity.

OTIF performance is reviewed monthly and benchmarked against predefined thresholds to proactively identify potential risks within the supply chain. The resulting risk level is scored using a standardized methodology, consistent with the approach outlined in Solenis’ **Supplier Relationship Management program** (refer to the **Global Procurement and Responsible Sourcing Policy**)

Overall Grade	OTIF %
Extremely Low Risk	100%
Low Risk	<100% and ≥98%
Medium Risk	<98% and ≥95%
High Risk	<95% and ≥90%
Extreme Risk	<90%

For more details on definitions of Risks Domain in scope refer to section 2.

**Appendix F – Point of contact**

Stakeholder	Name	Contact Email
Procurement Excellence	Solenis Supplier Risk Team	<a href="mailto:Supplerrisk@Solenis.com">Supplerrisk@Solenis.com</a>

Policy number: SL-POL-008.000  
 Original effective date: Sept. 24, 2024  
 Revised effective date: May 20, 2026

Revision number: 3  
 Pages: 18  
 Reviewed date: May 20, 2026

## SOLENIS POLICY Global Procurement & Responsible Sourcing

### 1.0 Policy purpose

The purpose of this policy is to describe the process for evaluation, selection, onboarding and performance management of Suppliers, Subcontractors, and Consultants based on their ability to meet Solenis requirements.

### 2.0 Scope

This policy applies to all third-party vendors globally who supply products and services to Solenis on a recurrent basis and for which we had spend for the last 12 months and for new vendors who will start supplying products and services to Solenis on a recurrent basis.

### 3.0 Sourcing process overview

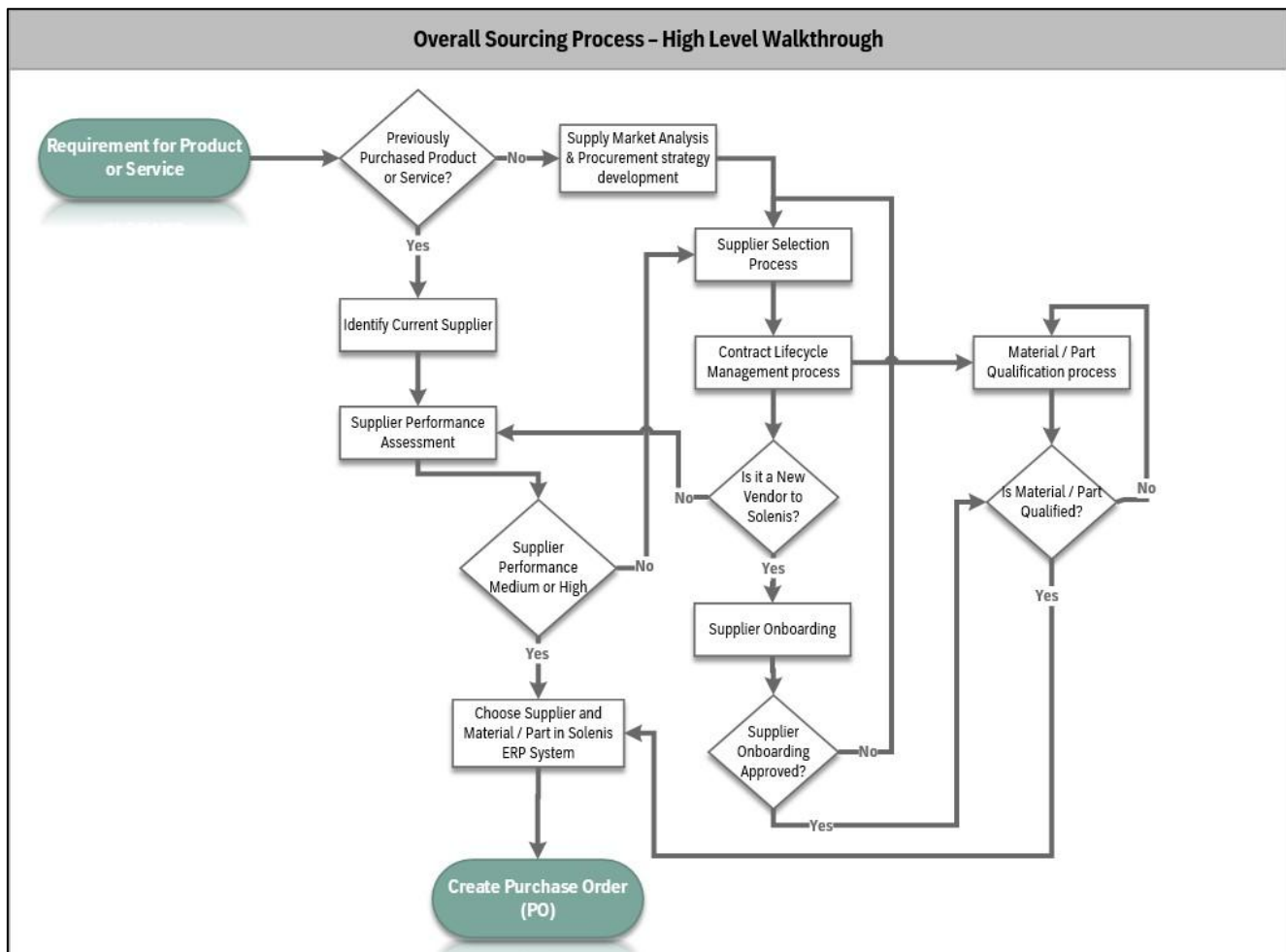


Figure 1 – Sourcing Process Workflow

## 4.0 Reference documents

### I. Internal references:

- [SL-POL-010.002 Responsible Chemistry Policy](#)
- [SL-POL-004.030 Human Rights Policy](#)
- [SL-POL-005.008 Deforestation & Biodiversity Policy](#)
- [SL-POL-008.007 Solenis Supplier Code of Conduct](#)
- [SL-POL-002.008 Financial Approval Authority](#)
- [SL-POL-009.001 Quality Policy](#)
- [SL-POL-008.012 Conflict Minerals Policy](#)
- [SL-PRT-001.003 Solenis Supplier Risk Assessment Protocol](#)
- [SL-PRT-001.002 – Onboarding a New Supplier](#)
- [SL-PRT-001.004 - Contract Lifecycle Management Protocol](#)
- [Solenis - Terms & Conditions](#)

### II. External references:

- ISO 9001:2015 – Quality management systems – Requirements
- ISO 14001:2015 – Environmental management systems – Requirements with guidance for use
- ISO 45001:2018 – Occupational health and safety management systems – Requirements with guidance for use
- ISO 13485:2016 – Medical devices – Quality management systems – Requirements for regulatory purposes
- RC 14001:2023 – Responsible Care® 14001 Technical Specification
- Regulation (EU) 2023/1115 of the European Parliament and of the Council of 31 May 2023 on making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010
- RPSO Principles and Criteria for Sustainable Cultivation of Oil Palms and Production of Sustainable Palm Oil and Oil Palm Products – Version 4.0

## 5.0 Definitions

<b>Solenis</b>	Represents all Solenis commercial units and majority-owned or controlled subsidiaries
<b>Supplier / Vendor</b>	Third-party entity providing products and/or services to Solenis. This includes Direct Suppliers, Subcontractors, Consultants & Indirect Suppliers
<b>Direct Supplier</b>	Third-party entity providing Solenis with purchasing materials, goods, or services that are directly incorporated into a final product or service offering (e.g., raw materials and components that Solenis requires to manufacture its products)
<b>Chemical Supplier</b>	Direct Supplier that provides chemical materials to Solenis
<b>Indirect Supplier</b>	Third-party entity supplying Solenis goods or services that support operations through non-core functions or services not directly related to product or service delivery (also referred to as "non-production" Suppliers)

<b>Strategic Supplier</b>	A Strategic Supplier is considered as a partner whose contribute to innovation, Solenis competitive advantage, and future growth opportunities through deep collaboration, shared goals and often multiyear contract
<b>Critical Supplier</b>	Supplier whose failure to deliver would cause significant disruption to operations, safety, or compliance continuity.
<b>Local Supplier</b>	Situated or located in same Region (per Solenis definition) as Solenis sourcing entity
<b>Consultant</b>	Third-party entity that evaluates Solenis' processes and provides guidance
<b>Supplier Onboarding</b>	Process to add a new Supplier to the Solenis Supplier database
<b>Request for Information (RFI)</b>	Process to gather specific information, such as product and services portfolio, capabilities, or financial information from a Supplier
<b>Request for Quotation (RFQ)</b>	Process to gather a quotation from a Supplier
<b>Spend under management</b>	Spend amount that is actively managed by the Procurement team
<b>Procurement Category</b>	Grouping of similar materials, goods, and services with common supply and demand Drivers, but may be sourced from different Suppliers
<b>R&amp;D</b>	Research & Development
<b>Contract Lifecycle Management (CLM)</b>	Encompasses all steps from contract creation to execution
<b>Contract Risk Assessment (CRA)</b>	A step of the Contract Lifecycle Management process where we review and assess potential risk linked to a contract
<b>Diverse Supplier</b>	A business that is at least 51% owned and operated by an individual or group that is part of an underrepresented community
<b>NPIR</b>	New Product Introduction Request
<b>RMR</b>	Raw Material Request
<b>RSPO</b>	Roundtable on Sustainable Palm Oil
<b>High Risk Clauses</b>	Contractual provisions that pose risk to operational exposure requiring a review to negotiate or mitigate potential liabilities

## 6.0 Global procurement engagement:

### I. Sustainable raw materials:

Sustainability is crucial to Solenis, not only in what we do at our plants and facilities, but in what we do to help our customers meet their own sustainability goals. We have developed a comprehensive sustainability strategy encompassing all the environmental, social, and governance elements of sustainability, which can be found at '[Sustainability - Strategic Vision](#)'. Solenis' sustainable procurement engagements are listed in the Solenis Supplier Code of Conduct.

At Solenis, we believe that sustainability is integral to our business operations. A key component of our sustainability strategy is the sourcing of sustainable raw materials. Solenis sources responsibly through building partnerships with Suppliers who share our commitment to environmental and social responsibility. Solenis prioritizes sustainable raw materials selection and considers alternatives, when possible, linked to:

- **Environment:**
  - **Renewable resources:** Prioritize materials that can be replenished naturally (e.g., timber from sustainably managed forests, renewable energy sources).

- **Reduced carbon footprint:** Minimize the greenhouse gas emissions associated with material extraction, processing, and transportation.
- **Water conservation:** Consider the water usage associated with raw material production and support Suppliers with efficient water management practices.
- **Waste reduction:** Minimize waste generated during the extraction, processing, and transportation of raw materials.
- **Social Responsibility:**
  - **Ethical labor practices:** Ensure that direct materials are sourced from Suppliers that comply with fair labor standards and applicable laws and provide safe working conditions.
  - **Respect for human rights:** Source direct materials from Suppliers that prohibit all forms of child and forced labor, slavery, or human trafficking in any of its facilities or operations.
  - **Community impact:** Seek to identify, prevent, or mitigate the negative impacts of raw material extraction on local communities, while supporting initiatives that promote sustainable livelihoods and social development.
  - **Local content:** Engaging local Suppliers contributes to sustainable economic development by promoting job creation and enhancing regional capabilities, while maintaining alignment with the organization's strategic and business requirements.

## II. Supplier Diversity

Solenis' is committed to supporting and empowering underrepresented communities by fostering economic development efforts, extending business opportunities, and showcasing the increasing importance of diverse Suppliers in our global value chain. Through Solenis' Supplier Diversity Program, Procurement professionals will identify and engage with certified diverse Suppliers where possible (as listed in the table below).

Our aim remains to continue growing the Supplier Diversity Program and provide equal business opportunities to under-represented Suppliers (starting with the US), as listed below:

- Minority-Owned (MBE)
- Women-Owned (WBE)
- Lesbian, Gay, Bisexual & Transgender-Owned (LGBT)
- Alaskan Native Corp or Tribally Owned (ANC)
- Veteran-Owned (VET)
- Service-Disabled Veteran-Owned (SDVET)
- Military Spouse Enterprise (MSE)
- Disadvantaged Business (DBE)
- Small Disadvantaged Business (SDB)
- Small Business (SBE)
- Small Business Administration 8(A)
- Business Development Program
- Women-Owned Small Business (WOSB)
- Economically Disadvantaged Women-Owned Small Business (EDWOSB)
- Historically Underutilized Business Zone (HUBZone)
- Airport Concessionaire Disadvantaged Business (ACDBE)
- Encouraging Diversity, Growth, and Equity

Supplier Diversity is part of Solenis **Supplier Selection** and **Supplier Onboarding** processes. The Procurement team works with non-Diverse Suppliers to support them in developing their own Supplier diversity program.

## 7.0 Procedure

### I. Supply Market Analysis and Procurement Strategy Development

For all spend under management, Procurement professionals will leverage market intelligence and trend data to identify potential suppliers, products and alternatives that will meet Solenis' requirements. The Procurement team will assess external factors such as geopolitical, economic, and regulatory factors that could impact the relevant market, and collaborate with internal stakeholders to collect data on specifications, customer requirements, and other business needs and expectations.

The Procurement team will identify and assess market players and their capabilities. This process includes understanding supply and demand trends and monitoring supplier base activity to inform the development of category-specific procurement strategies. Where relevant, strategy development will consider the key sustainability criteria for raw materials outlined in **Section 6.0**, as well as the risk domains identified in the [Supplier Risk Assessment & Management Protocol](#).

At Solenis we are constantly monitoring our direct material supply chain to ensure continuity of supply, mitigate shortages, ensure operational controls, and control costs to guarantee cost competitiveness of our finished products.

In order to enable this, we classify Direct Materials into three different categories:

- **Sole Source:** When Solenis purchases a material from only one qualified Supplier. This material may be highly specialized, a patented technology, have regional registration limitations, and on rare occasions, be produced by only one Supplier globally. Identifying alternatives for sole-source materials requires financial effort and lengthy validation/qualification time, involves cross-functional support and resources, and can include significant financial investment.
- **Single Source:** When Solenis purchases a material from one validated Supplier despite having multiple sources qualified by Solenis for the same material.
- **Multiple Source:** When Solenis purchases a material from multiple validated Suppliers.

We classify sole-sourced materials into two subcategories based on complexity:

- **High-Risk Sole Source:** High complexity, high investments, and very long validation time to identify an alternative.
- **Medium-Risk Sole Source:** Limited complexity, investments, and validation time to identify alternatives.

### II. Supplier Selection

The Procurement professional identifies project stakeholders and defines decision committee composition:

- For Direct Suppliers, stakeholders can be Quality, R&D, Regulatory, Sustainability, Environmental, Health & Safety or Product Management teams.
- For Indirect Suppliers, stakeholders can be Information & Technology, Marketing, Sustainability, Human Resources, Environmental, or Health & Safety.

Before engaging with a Supplier or initiating requests for quotation (RFQ), a formal Non-Disclosure Agreement (NDA) is signed and stored in the Solenis contract database.

The Procurement professional will always check if a Diverse Supplier is available in the market to respond to requests for information or quotation. This Supplier should be able to provide products that meet Solenis specifications and requirements.

Procurement professionals are encouraged to consider, where feasible, the inclusion of qualified local Suppliers in requests for information (RFI) and RFQ. Final sourcing decisions will be made following a comprehensive evaluation of relevant factors, including but not limited to foreign exchange rates, customs and transportation costs, applicable tax regimes, and prevailing sustainability regulations and guidelines.

Every request for information and quotation must contain the following elements. All Suppliers, Direct and Indirect, must agree with Solenis' Standard Terms and Conditions. Exceptions must be approved by Procurement professionals on a case-by-case basis. Specific requirements should be added depending on Supplier type as follows:

Specification / Requirement	For Direct Suppliers	For Chemical Suppliers
<p><b>Sustainability Requirements</b></p>	<ul style="list-style-type: none"> <li>• Acknowledge the Solenis' Supplier Code of Conduct               <ul style="list-style-type: none"> <li>○ <u>Acceptable Exception</u>: Supplier's Business Code of Conduct aligned with Solenis expectations following Procurement Excellence or Legal teams' review</li> </ul> </li> <li>• Be certified by a recognized ESG ratings provider or agency, such as EcoVadis and the Carbon Disclosure Program (CDP).</li> <li>• If the Supplier does not have any recognized sustainable certification, Procurement team will screen ESG supplier risk scoring through our risk screening platform (as described on <a href="#">Supplier Risk Assessment &amp; Management Protocol</a>)</li> <li>• If the product/service quoted is linked to a specific regulation (e.g. Regulation (EU) 2023/1115 on deforestation-free products, Regulation (EU) 2017/821 on conflict minerals) Suppliers must provide requested evidence of compliance</li> <li>• <u>As Optional</u>, we ask our Suppliers to: Commit to set SBTi (Science Based Targets Initiative) GHG Emissions reduction or similar science-based targets.               <ul style="list-style-type: none"> <li>• Water Target Reduction</li> </ul> </li> </ul>	<p>On top of stated requirement for Direct Suppliers, Chemical Suppliers must:</p> <ul style="list-style-type: none"> <li>○ Acknowledge Solenis' Biodiversity Policy</li> <li>○ Be a member of RSPO &amp; offer RSPO certified alternatives if the quoted product contains 'Palm Oil'</li> <li>○ <u>As Optional</u>, we ask our Suppliers to:</li> <li>○ Participate in American chemistry council's (ACC) Responsible Care Initiative</li> <li>○ Have a Carbon Disclosure reporting certificate or equivalent</li> <li>○ Have a Water reporting certification (CDP water or equivalent)</li> </ul>

<b>Regulatory Requirements</b>	<ul style="list-style-type: none"> <li>• Supplier to acknowledge “Substance of Concern Policy”</li> <li>• Iso 9001 certification</li> </ul>	<ul style="list-style-type: none"> <li>• Vendor Regulatory Request Form (VRR)</li> <li>• Safety Data Sheet (SDS)</li> <li>• For relevant countries: other compliance statements when applicable or requested</li> </ul>
<b>Commercial Requirement</b>	<ul style="list-style-type: none"> <li>• Lead Time must be formally agreed through a Statement of Work or a Contract</li> </ul>	
<b>Product Specifications</b>		<ul style="list-style-type: none"> <li>• Technical Data Sheet (TDS)</li> <li>• Certificate of Analysis (CoA)</li> </ul>

Procurement professionals will involve relevant stakeholders to define assessment criteria and evaluate Supplier answers and capabilities to comply with product specifications, required service levels, and Solenis’ policies and commitments. Procurement professionals will plan and conduct Supplier negotiations and assess Supplier risk. The decision committee will finalize Supplier selection based on project team recommendations and Supplier compliance with legal requirements, Solenis’ policies, and customers’ requirements. Procurement professionals are responsible for communicating the business award to the selected Supplier.

During the onboarding of suppliers within the scope of the Solenis Risk Management Protocol, any identified risks must be addressed promptly. Procurement professionals are responsible for collaborating with internal subject matter experts to define and implement appropriate mitigation strategies.

All identified risks and corresponding actions must be documented within our risk management platform, Coupa. Where applicable, suppliers should be actively involved in the development and execution of risk mitigation plans to ensure alignment and accountability.

### III. Contract Lifecycle Management (CLM)

Procurement professionals, in partnership with the Solenis Legal team, will initiate conversation with the Supplier to gather information to draft a new contract. Solenis’ standard contract templates should be used. In case of changes, Solenis’ Legal team will assist with ‘redlining’ and finalizing the contract draft (Appendix 0 - Figure 1 for Contract Lifecycle Master Workflow).

While Solenis contract templates are the preferred standard, supplier-proposed templates may be accepted provided they incorporate all critical protective clauses following a Legal review.

Before finalizing a contract, Solenis thoroughly analyzes the agreement to confirm it aligns with internal standards and addresses Supplier-specific risks identified during risk assessment process Refer to the [‘Contract Lifecycle Management Protocol’](#) for more details.

Solenis contract templates cover key areas such as:

- Compensation and performance standards
- Security, confidentiality, and data handling
- Contingency and business recovery plans
- Termination, dispute resolution, and liability limits
- Compliance, subcontractor use, and indemnification
- Ongoing Risk Monitoring and Contract Lifecycle Management

To identify potential contractual risks, a Contract Risk Assessment (CRA) must be conducted. The CRA evaluates key areas, including Commercial (Supply Security, Financial, and General Clauses), Legal, and Sustainability provisions (refer to Appendix 1 for detailed CRA clauses). This process is led by the Procurement professional, who reviews the contract to ensure all potential risks are identified and addressed.

Contracts will go through CRA based upon meeting at least 1 of the following criteria:

- Estimated annual spend value equals or is higher than \$1M
- Presence of High-Risk clauses (**Black Clauses**)

The contract is signed by the Supplier representative and Procurement professional as per Financial Approval Authority process (FAA-SL-POL-002.008). The Procurement professional is responsible for storing the final signed contract and related documents in Solenis' contract database (Appendix 0 – Figure 3 for Contract Approval Workflow).

Upon receiving automatic notification of upcoming contract expiration, the Procurement professional will investigate to renew or terminate the contract (Appendix 0 – Figure 2 for Renewal or Termination workflow). Before renewing a contract, the Procurement professional should:

- Align with the Global Procurement category strategy
- Review Supplier performance during the term of contract to ensure alignment with Solenis' expectations (section 9 - Supplier Performance Monitoring)
- Align with internal stakeholders to update Solenis' requirements
- Engage in negotiations with the Supplier to renew the contract, involving the Legal team if any changes are requested to the contract.

As part of our Supplier Relationship Management (SRM) program, compliance with contractual terms and obligations must be systematically reviewed during supplier performance evaluations.

In the event of any deviation, Procurement professionals are responsible for initiating a formal risk assessment within Coupa, in accordance with the Reactive Risk Management Process outlined in the Supplier Risk Assessment & Management Protocol. Appropriate mitigation actions must be identified and implemented, with supplier engagement as needed to ensure resolution and alignment with company standards.

#### **IV. Supplier Onboarding**

New Suppliers are onboarded per the process workflow highlighted below:

For a detailed review, please refer to the:

- [SL-PRT-001.002 – Onboarding a New Supplier](#)
- [Supplier Information Management Form \(SIM Form\)](#)

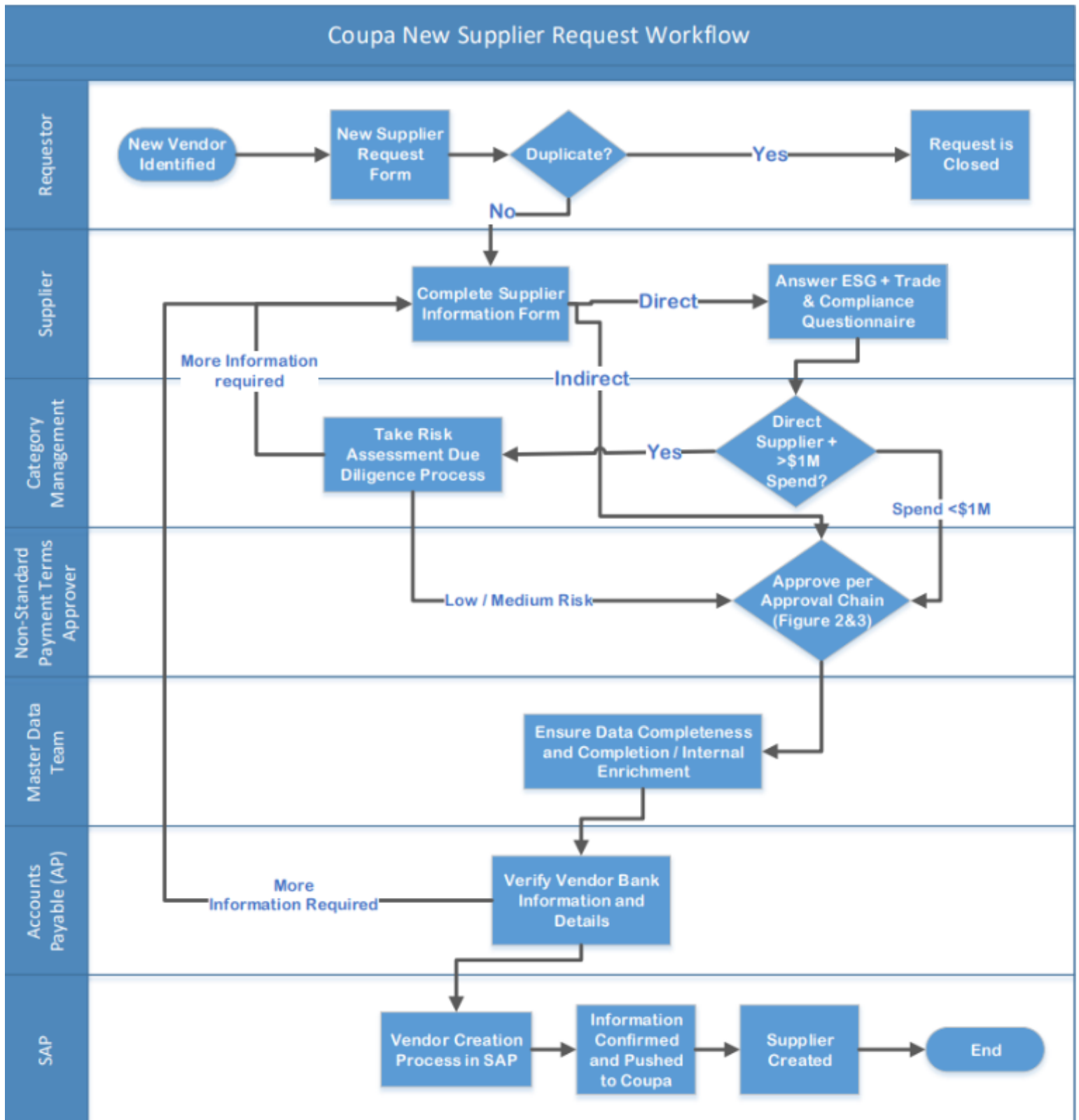


Figure 2 – Onboarding a New Supplier

Only requests reviewed and approved by Procurement will be processed. Supplier onboarding requests are not approved if:

- **Document(s) are missing / incorrect** – the Procurement professional contacts the Supplier to ask for the missing documents and then routes them to the Procurement operations team for evaluation and verification.
- **Misaligned Contact** – the Procurement professional provides the correct Supplier contact to Procurement operations.
- **No standard terms and conditions** – Procurement professional approval has to be requested for any Terms and Conditions deviation from Solenis standard.
- **Risk Assessment Outcome Not Acceptable** – Procurement Excellence involves the Procurement professional to define risk mitigation plan.
- **Failure to meet minimum ESG requirements** – Suppliers who do not hold recognized ESG certifications or fail to demonstrate compliance with Solenis' Sustainability Supplier requirements (eg:- Supplier Code of Conduct), or who require an on-site risk assessment may be excluded from onboarding.

## V. Material Qualification

In parallel with the Supplier Onboarding process, the Procurement professional initiates material qualification process through the NPIR process. Before creating RMR, the Procurement professional should ensure that Specifications of the material, service, and / or process listed in the CoA (Certificate of Analysis) are aligned with requested product specifications.

## 8.0 Supplier Risk Assessment

Solenis has implemented a comprehensive Supplier Risk Assessment Program to ensure responsible sourcing, regulatory compliance, and supply chain resilience. This framework applies to all existing Strategic and Critical Direct suppliers, as well as new Direct suppliers with an annual spend  $\geq$  \$1M, and selected indirect suppliers (e.g., warehousing).

### I. Key Principles

- **Risk-Based Approach:** Assessments are proportionate to nature, complexity, and the risk embedded in the supplier relationship.
- **Due Diligence:** Includes desk-based reviews, structured questionnaires, and—where necessary and upon feasibility—on-site audits.
- **Technology-Enabled:** Risk screening, assessment, mitigation and monitoring are supported by industry leading technology platforms like Interos, Coupa, Kharon, and Tableau.

### II. Risk Domains in Scope

Solenis Risk Program evaluates suppliers across multiple risk domains, including:

- ESG (Environmental, Social, Governance) including Human Rights & Labor Practices
- Anti-Bribery & Corruption
- Financial Stability
- Cybersecurity
- Geopolitical , Country Risk & Industry Risk

- N-Tiering (visibility into sub-suppliers)
- Operational Performance (e.g., On-Time In Full)
- Regulatory Compliance

### III. Risk Assessment Lifecycle

Solenis Supplier Risk Assessment process encompasses 5 steps, all supported by industry leading platforms to secure compliance and reporting

- Risk Screening (Inherent Risk Score)
- Risk Diligence (Collection of questionnaires & documentation)
- Risk Evaluation (Residual Risk Score)
- Risk Mitigation (Action plans led by Solenis Subject matter experts, involving suppliers where necessary)
- Continuous Monitoring (annual reviews, alerts)

### IV. Noncompliance with Solenis Supplier Risk Protocol

If any Suppliers in scope fails to comply with the corrective action plans or otherwise fails to address action plans within the agreed time, Solenis will take escalatory steps and may decide to place the supplier on a new business hold or identify alternative sources of supply.

Details of the framework are embedded into Supplier Risk Assessment & Management Protocol.

## 9.0 Supplier Relationship Management

The Supplier Relationship Management (SRM) program aims to enhance procurement processes and foster stronger partnerships with identified Suppliers. This program involves segmentation of Solenis' Direct Suppliers based on importance and strives to monitor performance regularly, conduct internal scoring evaluations, and collaborate on initiatives for continuous improvement as well as review compliance with contractual terms and obligations. On a yearly basis, Global and Regional Category team members review Suppliers' segmentation.

There are three Supplier SRM categories:

- **Strategic Suppliers:** High-value, high-impact partners essential for long-term success, innovation, and competitive advantage, necessitating deep collaboration and joint value creation.
- **Critical Suppliers:** High-risk Suppliers vital for operations due to supply chain dependencies, quality standards, or regulatory compliance.
- **Transactional Suppliers:** Low-value, low-risk Suppliers providing standard goods or services with minimal engagement beyond basic procurement.

## 10.0 Supplier Performance Management

We are monitoring our Suppliers' performance to ensure Suppliers' compliance with company policies and expectations, including, but not limited to, quality, timely delivery, commercial competitiveness, sustainability, risk management, and driving continuous improvement in the supply chain.

Procurement professionals use Supplier performance assessments to assess Supplier performance, compliancy and to strengthen the partnership with Solenis.

Scorecards are available for Strategic & Critical Chemical Suppliers. The list of suppliers in scope is refreshed on a yearly basis.

Scorecard KPI's and scoring mechanisms are refreshed on a yearly basis, before the end of the second quarter of each Fiscal Year.

Performance Scoring is structured in 3 Performance Tiers:

<b>Score of 49 &amp; Below:</b>	Does not meet expectations
<b>Score Between 50 - 79:</b>	Gaps identified in performance
<b>Score of 80 &amp; Above:</b>	Meet or Exceed expectations

### o Supplier Performance Scoring Mechanism

Performance Indicator	Metric Domain	KPI Measurement	Excellent	Good	Fair	Poor	Very Poor	KPIs Weight 2026
Service 35%	Quality	Quantity of Rejected Inbound Material	0%	0,01- 2 %	2,01- 5 %	5,01- 10 %	> 10 %	50.0%
	Deliveries	OTIF (On-Time in Full)	>95%	90-95%	85%-89%	80%-84%	<80%	50.0%
Commercial 35%	Cost Saving Ideation	Supplier Initiated Cost Savings	>3%	3% -2%	2% - 1%	1% - 0%	< 0%	28.0%
	Payment terms	Actual vs Targets	>105	76-105	61-75	45-60	<45	72.0%
Sustainability 30%	Ecovadis	Global ESG Certification / Sustainability survey	Platinum	Gold	Silver	Bronze	Other	25.0%
	CDP	CDP Rating / Score	A+ / A / A-	B+ / B / B-	C+ / C / C-	D+ / D / D-	Other	25.0%
	Code of Conduct	Code of Conduct signed	Solenis CoC signed	Supplier CoC aligned with Solenis principles (approved by Solenis)		Supplier CoC in line with Solenis principles (not approved by Solenis)	No CoC	25.0%
	Supplier Diversity Program	Supplier Diversity Program Implemented		Yes		No		25.0%

Solenis' Procurement Professionals will work with Suppliers on performance scoring below 80 to improve their score, providing suppliers with their overall performance insights, as well as helping them understand their performance and improvement opportunities by creating dedicated action plans into our Risk Management tool. Where appropriate, Solenis may offer targeted support, such as technical guidance, training, or collaborative programs, to help Suppliers strengthen their

capabilities and align with Solenis' expectations.

The **Supplier Sustainability Performance Benchmark** is provided to the Supplier in the Sustainability section of the Scorecard.

The benchmark is based on supplier sustainability performance reported in scorecard: Supplier Code of Conduct compliance and available internal or external ESG performance data, including EcoVadis ratings and CDP disclosures (Climate, Water and Forests).

The purpose of this benchmark is to help suppliers compare their sustainability performance with peers and encourage further progress in sustainable engagement.

If a Supplier consistently scores below 49 and shows no improvement despite the action plans initiated, the allocation of new business may be suspended until the score improves. In addition to business suspension, Solenis reserves the right to cancel outstanding orders, suspend future orders, and/or terminate the Supplier contract in cases of material breach of Solenis policies or refusal to implement agreed corrective actions within a reasonable timeframe.

Corrective actions are required when performance falls below defined thresholds:

- **If Quality Performance (Service) Score ≤80:**
  - Procurement Professionals, with the support of the Quality Team, will work with the Supplier to identify the quality issue's root cause and define a corrective action plan. In the event of repetitive quality issues, an on-site audit may be conducted.
- **If Delivery Performance (Service) score is <80:**
  - Procurement professionals, in partnership with the Supply Chain team, will work with the Supplier to identify the root cause of the issue and define a corrective action plan for improved delivery performance.
- **If Sustainability Performance score is <80:**
  - Procurement Excellence will work with the Procurement professional and the Supplier to define an improvement action plan on sustainability performance.
  - A documental or on-site assessment may be initiated to support further validation of Supplier practices, upon need.
- **If Commercial Performance (Combined) score is ≤80:**
  - The Procurement professional will partner with the supplier to identify cost reduction opportunities through Supplier-lead innovations, value engineered projects or negotiations (including Payment Terms extension).

## V. Voice of Supplier Survey

Solenis' Voice of Supplier survey gives our partners the opportunity to provide feedback on various components, including Supplier relationship & communication, Solenis' **Process Efficiency, Payment & Terms, Innovation & Future opportunities**, and **Sustainability Initiatives**. Suppliers can provide feedback to Solenis with no impact on future Business opportunities. This effort allows Solenis to identify areas of improvement and strengthen our relationship with our Suppliers. The survey is launched on an annual basis.

The Procurement team reaches out to Suppliers who have identified areas of improvement and provided constructive feedback to identify and work on improvement areas (**Refer to Appendix 2, for Voice of Supplier Survey questions**).

### 11.0 Use and maintenance of this policy.

This policy will be reviewed at least once per year by the Procurement Excellence team.

### 12.0 Training

On an annual basis all members of the Global Procurement organization will acknowledge this policy review through the Solenis Learning Management System.

### 13.0 Owner

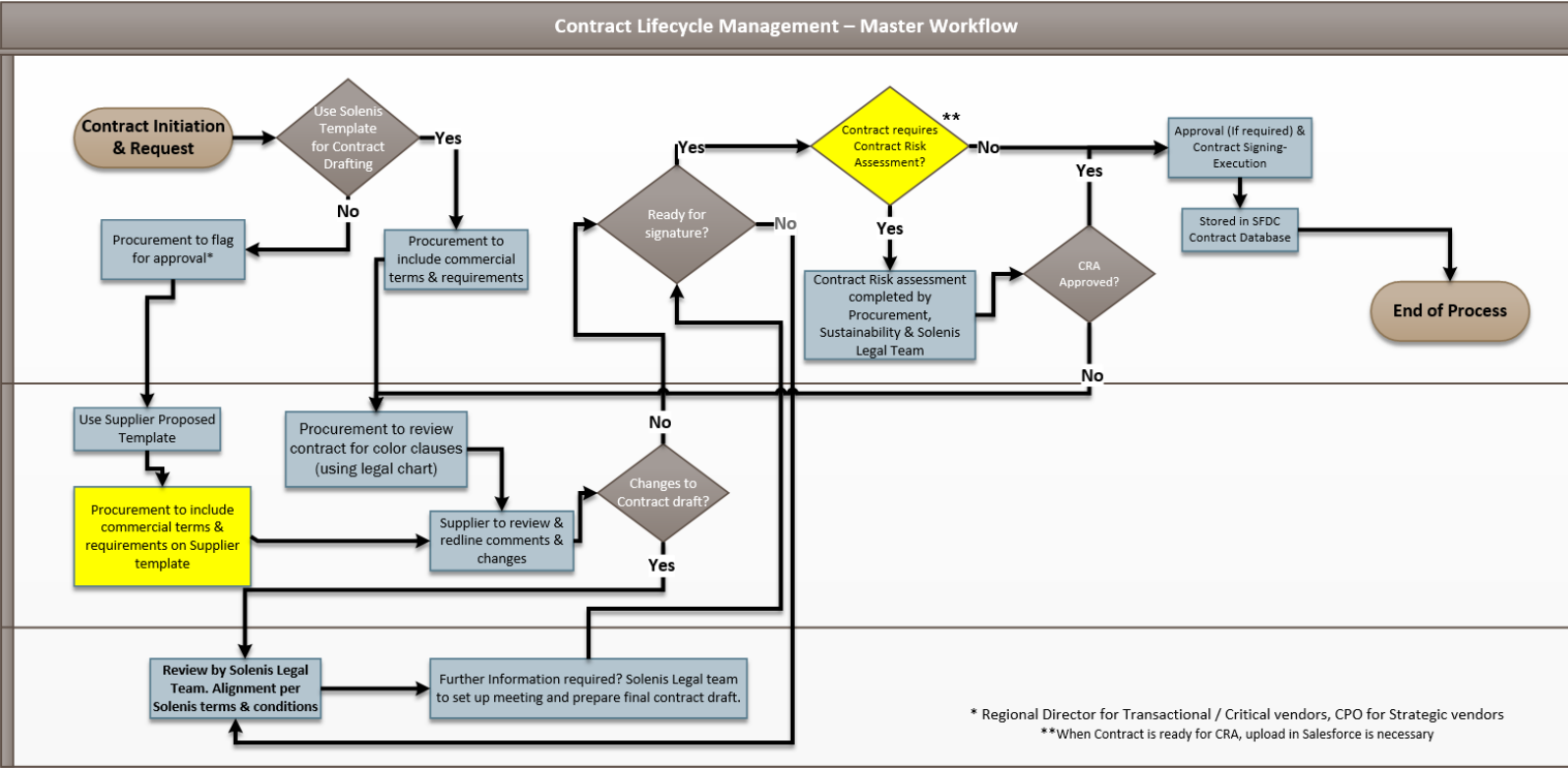
Procurement Excellence Director, Global Procurement

### Revision history

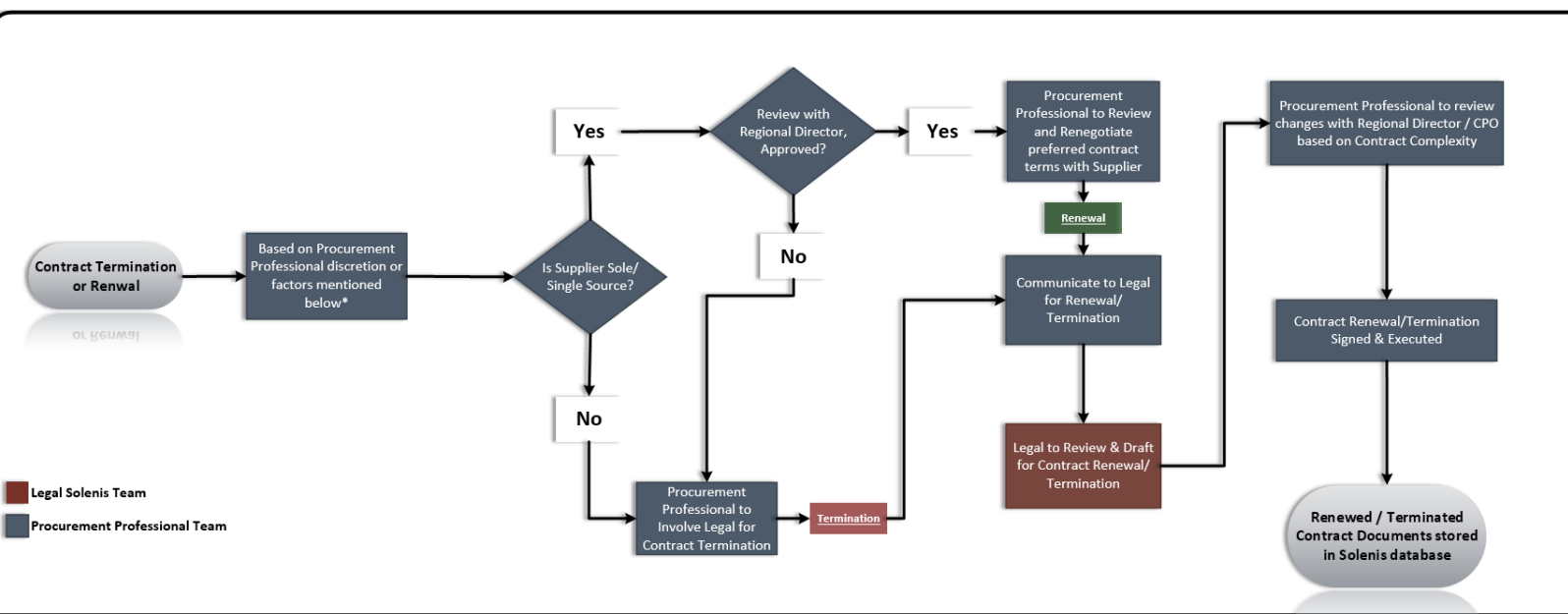
This is a history of notable changes to this policy:

Effective date	Section	Description of change
Dec. 16, 2024	5.0 7.0 8.0 9.0	Added Definition 'Strategic Supplier', 'Critical Supplier' Added 'Sole Source,' 'Single Source', Multiple Source' Added 'Supplier Relationship Management Program' Added New scoring mechanism for Supplier Performance
Aug. 5, 2025	6.0 7.0	Added 'Local content' in Social Responsibility section. Added reference to inclusion of qualified local Suppliers in 'II. Supplier Selection.'
Dec. 3, 2025	7.0 8.0	Added New Risk Management steps and workflow Added CRA (Contract Risk Assessment) Flow + Appendix 1 (Clause Details) Reviewed Overall Policy (Per Annual Guidelines)
May 20, 2026	7.0 10	Reviewed requirements for supplier onboarding Updated Supplier performance management

**Appendix 0 | Figure 1- Contract Lifecycle Management (CLM) Workflow**



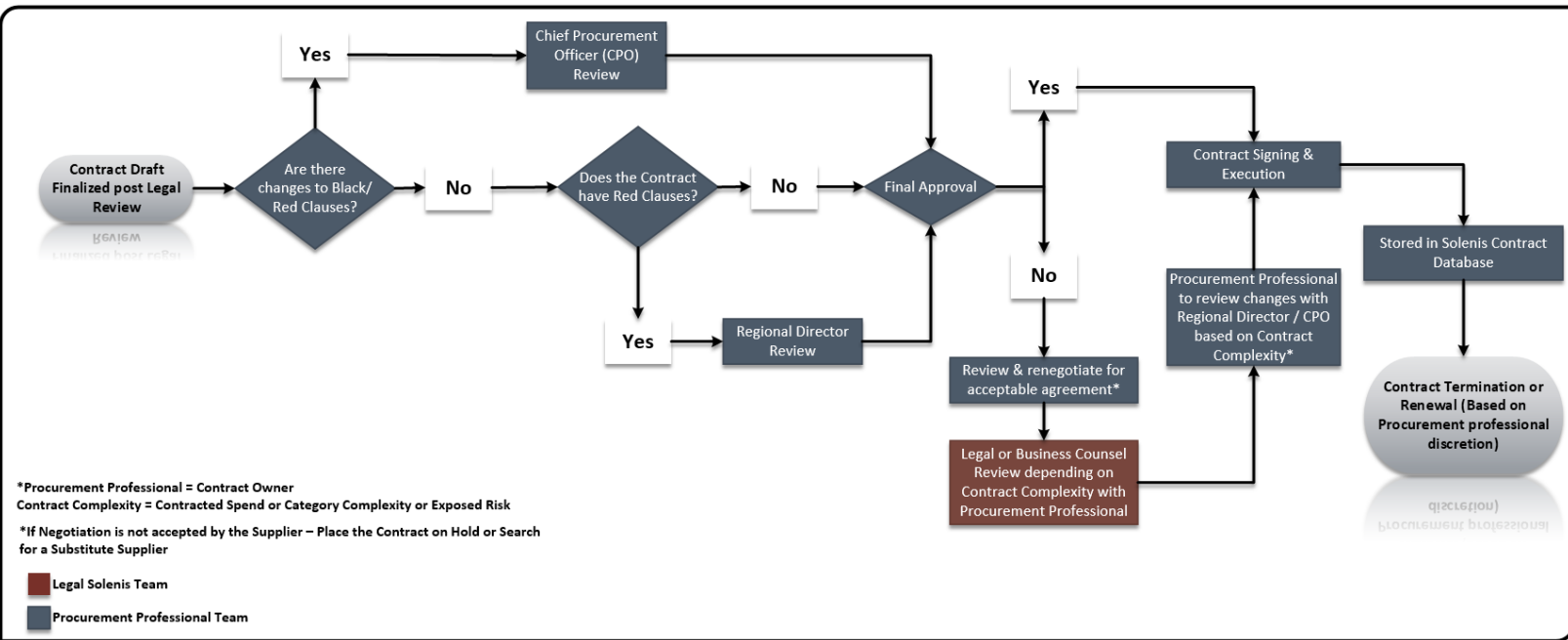
**Appendix 0 | Figure 2 – Contract Lifecycle Management - Termination & Renewal Workflow**



**\*Highlighted Factors that could affect Termination or Renewal of a Contract:**

- **Supply Performance** – If the Supplier performed as expected or above through the contract period and delivered material / services on time in full, meeting required quality
- **Price Discrepancy** – If there was a price mismatch or request to change prices besides what was agreed in the contract, or if the Price offered did not meet Solenis' requirement
- **Volume Requirements / Over Supply** – If volume requirements are not fixed or changes, compared to initial drafting and finalizing of contract terms
- **Core Expectations** – If the Supplier has disagreed to any mandatory Solenis requirements (Code of Conduct / Red Clauses)
- **Contract Terms** – Disagreement in Payment terms / Availability of Supplier / Liability Clause / Pricing methodology / Unable to meet Volume commitments
- **Other Factors** – As Determined by the Procurement professional per the Contract agreement or Supplier Relationship

**Appendix 0 | Figure 3 – Contract Lifecycle Management - Approval s Review Workflow**



**Appendix 1 | Contract Risk Assessment (CRA) – Clause Bifurcation**

Clause / Risk Segment	Contract Clause Sub-Segment	Risk Assessment Contract Clause
Commercial	Supply Security	<ul style="list-style-type: none"> <li>• Sole Source / Single Source (<i>Not Applicable</i>)</li> <li>• Change Notification (<b>Red</b>)</li> <li>• Intent to Withdraw (<b>Red</b>)</li> <li>• Quality Assurance (<b>Red</b>)</li> <li>• Non-Conformities (<b>Red</b>)</li> <li>• Force Majeure (<b>Red</b>)</li> <li>• Productivity Clause (<b>Green</b>)</li> <li>• Performance Guarantee (OTIF) (<b>Yellow</b>)</li> <li>• Quality Performance Guarantee (<b>Yellow</b>)</li> </ul>
	Financial Risk	<ul style="list-style-type: none"> <li>• No Take or Pay? (<b>Black</b>)</li> <li>• Volume Requirements (<b>Black</b>)</li> <li>• Payment Terms (<b>Yellow</b>)</li> <li>• Price Adjustment Methodology (<b>Black</b>)</li> <li>• No Rebate Linked Risk? (<b>Yellow</b>)</li> <li>• Currency Provisions (<b>Yellow</b>)</li> <li>• Meet or Release Clause (<b>Green</b>)</li> </ul>
	General Clauses	<ul style="list-style-type: none"> <li>• Contract Termination Clause (<i>Not Applicable</i>)</li> <li>• Category Strategy Alignment (<i>Not Applicable</i>)</li> </ul>
Legal	Legal Clauses	<ul style="list-style-type: none"> <li>• Warranties (<b>Red</b>)</li> <li>• Remedies (<b>Red</b>)</li> <li>• IP Rights (<b>Red</b>)</li> <li>• Change of Control Clause (<b>Red</b>)</li> <li>• Assignment Rights (<b>Red</b>)</li> <li>• Governing Law (<b>Red</b>)</li> <li>• Most Favored Nation (<b>Green</b>)</li> <li>• Termination For Convenience (<b>Red</b>)</li> <li>• Supplier Duty to Cooperate with Audits (<b>Red</b>)</li> <li>• Insurance and Coverage Amount (<b>Red</b>)</li> </ul>
Sustainability	Sustainability Clauses	<ul style="list-style-type: none"> <li>• CoC (Code of Conduct) Acknowledgement (<b>Red</b>)</li> <li>• Vendor CoC (Reviewing Vendor CoC) (<i>Not Applicable</i>)</li> <li>• Compliance with Laws (<b>Red</b>)</li> <li>• Supply Chain Diligence: Sub-Supplier Management (<b>Red</b>)</li> <li>• Periodical Assessments (<b>Green</b>)</li> </ul>

**Appendix 2 | Solenis Voice of Supplier Survey - Questionnaire**

**Solenis Voice of Supplier Survey**

<b>Supplier Relationships Communication</b>	How would you rate overall communication with our company?
	How frequently do you receive updates or feedback from our team?
	Are the points of contact in our company clear and accessible?
	How would you rate the overall partnership with Solenis?
	What could Solenis do to improve our communication?
<b>Process Efficiency</b>	How would you rate the efficiency of our procurement processes such as ordering, forecasting...?
	Does Solenis clearly communicate our expectations regarding product/service quality?
	How can we help you meet our quality standards more effectively?
	How satisfied are you with the clarity of our purchasing requirements (product specifications, volume...)?
	How often does Solenis provide constructive feedback on your performance?
	Are there any specific bottlenecks or inefficiencies you've experienced while working with Solenis?
	How can we improve our processes to make your interactions with Solenis smoother?
<b>Payments Terms</b>	Timeliness of Solenis Payments
	Invoice Management Visibility
	Contact with Solenis Accounts Payable Team
<b>Innovations Future Opportunities</b>	Do you feel that Solenis provides opportunities for innovation or collaboration on new projects?
	How can we work together to be more competitive in the market?
	How would you rate Solenis processes based on integrity and fostering positive relationships?
<b>Sustainability Initiatives</b>	Rate your awareness on "Canadian Transparency Act / Norwegian Transparency Act / EUDR Regulations"?
	Which Solenis Sustainability initiatives are you aware of?
	Is there any sustainability-related initiative you'd like to propose to Solenis for partnership (e.g., VAVE workshop, charity events, GHG emissions reduction initiatives, etc.)
	Will you be willing to share best practices linked to sustainability with Solenis?
	Are there any sustainability-related requirements you have received from Solenis that you are unfamiliar with or have questions/or concerns about?

Policy number: SL-POL-008.012  
Original effective date: Aug. 1, 2014  
Revision number: 3  
Revised effective date: Aug. 26, 2022  
Pages: 2

## **SOLENIS POLICY Conflict Minerals**

### **1.0 Policy**

Solenis, its commercial units and majority-owned or controlled subsidiaries (“Solenis”) will ensure procurement of our raw materials, intermediates or other goods are in compliance with the conflict minerals rule under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Conflict Minerals Rule) issued by the U.S. Securities and Exchange Commission (SEC) as well as the EU Conflict Minerals Regulation.

### **2.0 Definition of conflict minerals**

In 2012, the SEC issued the final conflict minerals rule, requiring reporting of the presence of tin, tungsten, tantalum and gold (3TGs) and other minerals determined by the U.S. government to be financing conflict in the Democratic Republic of the Congo or adjoining countries.

In 2017, the European Union passed a new regulation that ensures members import these minerals from responsible sources only.

### **3.0 Conflict mineral program**

Solenis supports the goal to end violence and human rights violations in regions of conflict. In order to ensure that our raw materials meet this goal, Solenis from time to time performs a self-assessment to determine our risk profile relative to any raw materials which may be considered as a conflict mineral. As a result of our self-assessment, we will make requests to suppliers for more information relative to possible use of conflict minerals in the production of Solenis’ raw materials, intermediates or other goods.

Solenis has implemented this policy to prevent sourcing of conflict minerals in the future and reserves the right to deny future business to suppliers who are unable to meet these requirements.



#### 4.0 Owner

Chief Procurement Officer

#### 5.0 Scope

This policy applies to Solenis in the United States and the European Union

#### 6.0 Exceptions

There are no exceptions to this policy.

#### Revision history

This is a history of notable changes to this policy.

Effective date	Section	Description of change
Jan. 19, 2021	1.0	Changed Entity from Solenis International LP to Solenis UK Industries Limited
Feb. 12, 2021	4.0 and Title	Changed owner title to Chief Procurement Officer and renamed Conflict Minerals
Aug. 26, 2022	1.0 2.0 5.0	Changed Entity from Solenis UK Industries Limited to Solenis and added the EU new regulation information Included EU in the definition Modified the scope to include the EU

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Policy number:	SL-POL-005.000	Revision number:	3
Original effective date:	Aug. 1, 2014	Pages	3
Revised effective date:	January 26, 2026	Reviewed date:	January 26, 2026

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## **SOLENIS POLICY**

### **Responsible Care\* - Environmental, Health, Safety and Security**

#### **1.0 Policy**

Solenis (including all subsidiaries) is committed to protecting the environment and ensuring the health, safety, and security of our workers, their families, customers, and the communities where we work and live. Further, we are committed to the prevention of work-related injury and ill health for our workers, eliminating hazards and occupational health and safety risks, and ensuring consultation and participation of workers and, where they exist, workers' representatives. We strive to provide exceptional product stewardship in support of our customers, suppliers, and the markets that we serve. We aim to be an industry leader in these areas, and we are committed to operating our global facilities and businesses in accordance with the principles of Responsible Care.

#### **2.0 Responsible Care Goals**

Solenis' core values, principles, and commitments are reflected in these Responsible Care goals:

**Operate with zero harm (incidents).** We believe that all injuries, occupational illnesses, and incidents are preventable, and we are committed to operating with a zero-harm (incident) culture. Our culture engages all workers and promotes safety and environmental stewardship for our workers and their families. We design, build, and operate our facilities to be safe, secure, and environmentally and community-friendly.

**Ensure compliance.** We are committed to ensuring compliance with applicable environmental, health, safety, and security laws, regulations, technical specifications, and internal standards while adhering to high ethical standards.

**Reduce environmental, health, safety, and security impact.** We are committed to continuously improving our processes and to providing products and services that, throughout their life cycle, involve minimal risk to people and the environment, while best meeting the needs of our customers. We are committed to continually reducing the impact of our operations and products in support of global sustainability efforts. We strive to eliminate or reduce emissions, discharges, pollution, and waste from our operations, and to promote energy efficiency and resource conservation throughout the value chain.

#### **3.0 Transparency**

We maintain an open and active dialogue with our workers and communities about environmental, health, safety, security, and product stewardship issues. We work with governments, policymakers,

advocacy groups, and value-chain partners to develop and promote laws, regulations, and practices that improve human health and the environment.

#### **4.0 Global management system**

Our Responsible Care management system provides the foundation to achieve our Responsible Care goals. We are committed to continually improving our processes and performance across our global businesses. We measure and regularly report our performance to our stakeholders.

#### **5.0 Product stewardship**

We work with our customers, suppliers, carriers, and distributors to ensure product safety and enhance product stewardship. We develop and produce products that can be manufactured, distributed, used, and recycled or disposed of in a safe, secure, and environmentally sound manner. We provide product safety information throughout the value chain so our customers and end-users can understand and manage risk, and provide meaningful, relevant information to their respective stakeholders.

#### **6.0 Responsible party**

Conforming to this policy is the responsibility of every worker as a condition of employment. Solenis management will lead by example and educate and train workers and stakeholders.

#### **7.0 Scope**

This applies to Solenis (all its subsidiaries).

#### **8.0 Owner**

The chief operations officer is responsible for the implementation of, and amendments to, this policy.

#### **9.0 Endorsement**



John E. Panichella, CEO

#### **10.0 Exceptions**

There are no exceptions to this policy.

\* "Responsible Care" is a registered trademark of the American Chemistry Council.

## Revision history

This is a history of notable changes to this policy.

Effective date	Section	Description of change
Jan. 1, 2019		“Employee” has been replaced by “worker”
July 6, 2023	Sec. 1, 2, 7 and 8	Added <ul style="list-style-type: none"><li>• All subsidiaries including Diversey</li><li>• Customer</li><li>• and consultation and participation of workers, and, where they exist, workers’ representatives</li><li>• pollution</li><li>• New owner of the policy is the chief operations officer</li></ul>
January 26, 2026	Sec. 1	<ul style="list-style-type: none"><li>• Revised “all subsidiaries including Diversey...” to “all subsidiaries...”</li></ul>

# Responsible Care® Global Charter

**Responsible Care** is the global chemical industry's unifying commitment to the safe management of chemicals throughout their life cycle, while promoting their role in improving quality of life and contributing to sustainable development.

*As a signatory to the Responsible Care Global Charter my company will actively strengthen the Responsible Care initiative worldwide and is committed to:*

**0**

**A Corporate Leadership Culture** that proactively supports safe chemicals management through the global Responsible Care initiative

**8**

**Safeguarding People and the Environment** by continuously improving our environmental, health and safety performance; the security of our facilities, processes and technologies; and by driving continuous improvement in chemical product safety and stewardship throughout the supply chain

**e**

**Strengthening Chemicals Management Systems** by participating in the development and implementation of lifecycle-oriented, sound-science and risk-based chemical safety legislation and best practices

**(**

**e**

**Influencing Business Partners** to promote the safe management of chemicals within their own operations

**G**

**Contributing to Sustainability** through improved performance, expanded economic opportunities and the development of innovative technologies and other solutions to societal challenges

Solenis LLC

September 1, 2022

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Only the English language version is the official document

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Policy number:	SL-POL-004.003	Revision number:	N/A
Original effective date:	April 3, 2020	Pages:	5
Revised effective date:	N/A	Reviewed date:	July 11, 2023

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## SOLENIS POLICY Investigations

### 1.0 Policy

Solenis is committed to growing based on a core-value foundation of integrity, respect and accountability. The cornerstone of this foundation is our [Global Standards of Business Conduct](#).

Success at Solenis depends on our steadfast focus on creating a Deliberate Ethics<sup>sm</sup> Culture. Deliberate Ethics is a mind-set of being intentional about driving and maintaining a high-performance culture while staying true to our core values and keeping the Global Standards of Business Conduct top of mind. Solenis' Deliberate Ethics Culture helps ensure the company and its employees continue to adhere to honest and fair dealings with our customers, communities, fellow employees, suppliers and investors.

Internal investigation is a method by which Solenis examines the facts and reaches conclusions regarding the allegations of suspected or known misconduct or violations of the applicable laws and the Global Standards of Business Conduct and supporting Solenis' policies or procedures.

Investigations focus on determining the existence of non-compliance, taking appropriate remedial actions to correct non-compliance, recovering any lost assets and correcting any control deficiencies to prevent repeated instances of non-compliance.

It is essential that investigations are handled in an appropriate, confidential and expeditious manner to ensure that: (a) individuals are treated fairly, justly and with respect during the investigation process, (b) the risk of litigation against the company is appropriately managed and minimized, (c) the opportunity for asset recovery is maximized and (d) improvements in controls are identified to prevent future recurrences.

### 2.0 Definitions and abbreviations

**Concerns** – allegations of suspected or known violations of the law, the Global Standards of Business Conduct and / or Solenis' policies or procedures.

**Investigation(-s)** – a privileged and confidential internal inquiry process, by which the company with or without the involvement of a third party, seeks to establish facts and reach conclusions regarding reported concerns and recommend remediation or disciplinary measures.



**Investigation Process** – a progression of steps for Investigators to follow within the scope of each individual Investigation, as further specified in the Investigation Protocol that supports this Investigations policy.

**Investigator(-s)** – a Solenis employee(-s) charged by Solenis' Office of Ethics and Compliance, Legal Department, to conduct an Investigation.

**OEC** – Solenis' Office of Ethics and Compliance.

**SERC** – Solenis' Employee Review Committee.

### **3.0 Investigation process**

OEC oversees Investigations and the Investigation Process. OEC may begin an Investigation at its sole discretion or in response to a report, submitted pursuant to Solenis' [Reporting policy](#), after assessing the information and credibility of the allegations in such report.

OEC conducts Investigations by itself or may delegate to or work jointly with another Solenis department, including Human Resources.

The Investigation Process may vary depending on the nature of reported Concerns, extent or gravity of suspected misconduct and complexity of the issues involved. Generally, the Investigation Process consists of document collection and interviews. OEC may choose to involve external consultants or forensic specialists to assist with any part of the Investigation Process.

Depending on the findings, an Investigation may result in remediation measures, including training or any corrective actions to address relevant control gaps or process deficiencies. An Investigation may also result in a disciplinary action, including employee termination, if the findings indicate that a violation of Solenis' Global Standards of Business Conduct occurred.

If the Investigation findings contemplate a disciplinary action, the OEC shall refer the matter to SERC which shall review the findings and agree, reject or make its own recommendations with respect to appropriate disciplinary actions.

### **4.0 Expeditious process**

Although there are no formal time requirements for when the OEC must conclude a given Investigation, the company commits to conducting the Investigation Process expeditiously, taking into account such issues as evidence preservation, disclosure obligations, statute of limitations, as well as all other relevant time constraints, limitations, circumstances and considerations that may apply.

### **5.0 Cooperation**

The OEC appreciates and depends on the cooperation of its employees when conducting Investigations. Solenis employees are required to cooperate with Investigations.



Cooperation includes participation in Investigation interviews, during which employees are expected to provide full and truthful information to the best of their knowledge or recollection in response to specific queries made by Investigators. Cooperation also includes preservation and orderly hand-over of documents or data in any format, as may be instructed by the Investigators.

An employee refusal to cooperate in an Investigation may result in disciplinary measures, including employment termination.

## **6.0 Data preservation and collection**

Preservation of relevant hard-copy documents, electronic data and other physical material is critically important upon indication of a potential issue that may trigger an Investigation.

Employees may receive a preservation or document hold notice from the OEC or the Legal department and will be required to ensure that potentially relevant material, indicated in the notice, is preserved. Employees may be interviewed to determine whether they possess data relevant to an Investigation, where it is stored, and how best to collect it.

The OEC may take immediate steps to preserve all data related to an Investigation, including relevant inactive data residing on backup tapes, archival media, cloud-based storage or elsewhere. The OEC may collect potentially relevant evidence (including hard-copy documents, data and other tangible items) from any source that the company owns, possesses or controls. In certain instances, as determined by Investigators, data preservation and collection may occur without notice to employees.

Information from sources owned by Solenis belong to the company. Solenis cannot guarantee that employee personal emails, documents, text messages or other data will not be collected, reviewed, or produced to a third party, including government agencies.

Employees are prohibited from deleting or destroying any data relevant to an Investigation. Destruction or tampering with the relevant data may lead to disciplinary action and, in some cases, may result in criminal liability for the individuals involved.

## **7.0 Confidentiality**

Solenis has a strong interest in maintaining the confidentiality of any information related to the Investigation Process.

Under this policy and unless instructed otherwise by the Investigators, Solenis employees are not authorized to disclose, discuss or share internally or externally, outside Solenis, any information, including recollections or personal impressions about the Investigations that the employees are or were involved in or may have become aware of.

## **8.0 Attorney-client privilege**

Communications related to an Investigation are considered confidential and subject to attorney-client privilege. Such privilege shall exist between the OEC, the Legal department and Solenis,



for the purpose of providing legal advice to Solenis' Board of Directors. Communications between the Investigators and Solenis employees invited to participate in the Investigation Process, particularly in Investigation interviews, shall not create attorney-client relationship and privilege between the Investigators and such employees.

Because Solenis controls the privilege, the company may share the information gathered during the Investigation Process with Solenis' Board of Directors and third parties, including government authorities, if necessary, without the employees' consent.

## **9.0 Policy violations**

Violation of any of the requirements under this policy may result in disciplinary action, including employment termination. Under certain circumstances, a policy violation, particularly if it concerns destruction of the relevant evidence, may lead to criminal liability for the employees involved.

## **10.0 Training and communication**

Training on this policy will be provided as necessary.

## **11.0 Other relevant policies and protocols**

- [Global Standards of Business Conduct](#);
- [Reporting policy \(SL-POL-004.013\)](#);
- Investigations Protocol (Internal Document for OEC, Legal department);
- Investigations Toolkit (Internal Document for other Solenis departments, that may be involved in the Investigation Process).

## **12.0 Owner**

Senior Vice President and General Counsel.

## **13.0 Exceptions**

There are no exceptions to this policy.

## **14.0 Scope**

This applies to Solenis.

## Revision history

This is a history of notable changes to this policy.

Effective date	Section	Description of change

Policy number: SL-POL-004.013      Revision number: 3  
Original effective date: April 3, 2020      Pages: 4  
Revised effective date: Feb. 23, 2024      Reviewed date: Feb. 8, 2024

## SOLENIS POLICY Reporting

### 1.0 Policy

Solenis is committed to growing based on a core-value foundation of integrity, respect and accountability. The cornerstone of this foundation is our [Global Standards of Business Conduct](#).

Success at Solenis depends on our steadfast focus on creating a Deliberate Ethics<sup>SM</sup> Culture. Deliberate Ethics is a mindset of being intentional about driving and maintaining a high-performance culture while staying true to our core values and keeping the Global Standards of Business Conduct top of mind. Solenis' Deliberate Ethics Culture helps ensure the company and its employees continue to adhere to honest and fair dealings with our customers, communities, fellow employees, suppliers and investors.

Reporting on or sharing concerns regarding suspected or known misconduct or violations of the applicable laws or the Global Standards of Business Conduct and supporting policies or procedures is the key element of Deliberate Ethics Culture.

The purpose of this policy is to reinforce Deliberate Ethics Culture by providing a safe and reliable means for Solenis employees and others to report concerns they may have about conduct impacting Solenis. By following this policy, Solenis employees can raise concerns, confidentially and anonymously, if desired, and free of any retaliation, discrimination or harassment.

### 2.0 Definitions and abbreviations

**Concern** – any information related to actions, practices or process irregularities, suspected or known to be in violation of Solenis Global Standards of Business Conduct, supporting policies and procedures and/or applicable laws.

**OEC** – Solenis' Office of Ethics and Compliance.

**Reporter** – any individual, whether or not a Solenis employee, who shares a Concern.

### 3.0 Responsibility to report

Each Solenis employee has the responsibility to report or share in good faith any Concerns, including Concerns about actual or suspected violations of Solenis Global Standards of Business Conduct, Solenis policies and procedures or any laws or regulation governing Solenis operations.

Appropriate subjects to report under this policy include but are not limited to financial improprieties,

accounting or audit matters, ethical violations or other similar illegal or improper practices, including but not limited to:

- Harassment or discrimination
- Fraud
- Theft
- Bribery or kickbacks
- Misuse of company assets
- Conflicts of interest.

#### 4.0 Good-faith reporting

A Solenis employee sharing a Concern must act in good faith in believing the information disclosed or shared indicates a violation of ethical standards. Any unfounded allegation that proves to have been made maliciously, recklessly or knowingly to be false may be viewed as a serious offense and result in a disciplinary action, up to and including termination of employment.

#### 5.0 How to report or share a Concern

All Concerns should be reported as soon as practicable and consistent with this policy:

- **Certification of compliance with the Global Standards of Business Conduct:**

Each Solenis employee has the obligation to share or report any Concerns during the annual company-wide Global Standards of Business Conduct certification process.

- **Solenis managers and directors, representatives of the Human Resources, the Legal department or the Office of Ethics and Compliance:**

When appropriate, a Concern can be shared by discussing the situation with a manager, who must then convey the relevant information to the Human Resources, Legal department or the OEC for further consideration. A Concern can also be shared directly with the Human Resources, the Legal department or the Office of Ethics and Compliance.

- **Confidential reporting system:**

Reporters may submit a Concern in writing by:

- (i) clicking the “Share Your Concern” link on Solenis’ InSite intranet home page; and
- (ii) after being redirected to the “Share Your Concern” page, by clicking on the interactive “Submit a report or share a concern by webmail” button, which will then take Reporters to the reporting portal (“Lighthouse”).

Lighthouse will guide Reporters through the necessary submission steps and give Reporters an option to remain anonymous. Lighthouse will also allow Reporters to follow up on any of the previously submitted Concerns, while preserving Reporters’ anonymity.

Reporters may also share a Concern by telephone. The “Share Your Concern” page provides the necessary details:

- (i) For calls in the U.S. and Canada, Reporters can use the following toll-free number: +1 833 203 3981;

- (ii) For calls from other countries, Reporters can use the list of access codes provided on the “Share Your Concern” page and also listed below in [Annex 1](#) to this policy. As with the sharing of Concerns by webmail, the telephone option also allows Reporters to remain anonymous.

(iii)

Should a Reporter choose to reveal his or her identity, Solenis will take the necessary steps to protect the Reporter’s identity and keep the substance of the reported Concern confidential to the extent it is consistent with the need to conduct an adequate investigation.

Solenis protects Reporters from any form of retaliation for sharing Concerns.

## **6.0 Ask an ethics and compliance question**

OEC encourages any Solenis employee who is unsure if misconduct or violation has occurred or does not believe that reporting a Concern is warranted, to ask the OEC a question.

A Solenis employee can ask a question by following the “Share Your Concern” link on the Solenis InSite home page and, when on the “Share Your Concern” page, by clicking the button “Ask an Ethics and Compliance Question.”

As with reporting or sharing a Concern, Solenis shall take reasonable steps to protect the identity of the employee asking a question, unless the employee specifically waives confidentiality of the communication.

## **7.0 Response to a reported Concern**

Anyone who becomes aware of a Concern must promptly notify their manager or any representative of the Human Resources Department, the Legal Department or the OEC. The OEC will acknowledge receipt of the Concern, unless the Concern was submitted anonymously or no return address or contact details are provided.

The OEC shall conduct a prompt, discreet and objective review or investigation based on the shared Concern. Any investigation shall be conducted in accordance with Solenis’ [Investigations policy \(SL-POL 004.003\)](#). A full investigation may not be possible if a Concern conveyed anonymously is vague or general.

At its own discretion and subject to legal and/or other constraints, the OEC may share with the Reporter the information about the outcome of an investigation.

## **8.0 No retaliation**

A Reporter who in good faith reports or shares a Concern or participates in a review or investigation of a Concern shall not be subject to harassment, retaliation or adverse employment consequences because of such participation. This protection extends to individuals who report in good faith, even if the allegations are not substantiated.

Any individual who retaliates against someone who in good faith has shared a Concern or participated in a review or investigation of a Concern will be subject to discipline, up to and

including termination of employment.

Anyone who believes that an individual has been subject to harassment, retaliation or adverse employment consequences as a result of making a good faith report or participating in a review or investigation of a Concern should contact the OEC: [ethicsandcompliance@solenis.com](mailto:ethicsandcompliance@solenis.com).

## 9.0 Policy violations

Violation of any of the requirements under this policy may result in disciplinary action, including employment termination.

## 10.0 Training and communication

Training on this policy will be provided as necessary.

## 11.0 Other relevant policies and protocols

- [Global Standards of Business Conduct](#);
- [Investigations policy \(SL-POL 004.003\)](#).

## 12.0 Scope

This policy applies to Solenis, its commercial units and majority-owned or controlled subsidiaries.

## 13.0 Owner

Solenis' General Counsel is responsible for implementation of, and amendments to, this policy.

## 14.0 Exceptions

There are no exceptions to this policy.

## Revision history

This is a history of notable changes to this policy.

Effective date	Section	Description of change
April 3, 2020	Throughout	This replaces the previous Whistleblower and Non-retaliation policies in their entirety.
Feb. 12, 2021	Throughout	Reviewed; company name updated.
Nov. 28, 2022	5.0	Replaced Lighthouse toll-free number.
Feb. 8, 2024	5.0 and Annex 1	Revised throughout; company name updated; inclusion of Annex 1 in the document.
Sep. 1, 2025	Annex 1	Revised to update toll-free numbers per country.

## Annex 1 to Solenis' Policy on Reporting (SL-POL-004.013)

<b>Country</b>	<b>Direct number</b>	<b>Language</b>	<b>Press</b>
Argentina	0800-345-5408	English	1
Australia	1-800-768-120	Spanish	2
Austria	0800-018-227	French	3
Bangladesh	880 (0) 9610-991077	Chinese	4
Belgium	0800-262-67	German	5
Brazil	0-800-591-6043	Italian	6
Canada	833-203-3981	Portuguese	7
Chile	800 914 722	Japanese	8
Colombia	01800-913-5293	Arabic	9
Czechia	800-880-804	Hungarian	01
Denmark	80 25 42 15	Polish	02
Dominican Republic	1-809-200-9606	Dutch	03
Egypt	20 150 169 205	Czech	04
Finland	0800 415829	Taiwanese	05
France	0805-080039	Korean	06
Germany	0800-183-0724	Tagalog	07
Ghana	233 24 242 6323	Vietnamese	08
Greece	800 848 1316	Indonesian	09
Guatemala	502 2458 1142	Finish	001
Hong Kong	800-906-523	Russian	002
Hungary	06 80 019 675	Hindi	003
India	000 800 0501 552	Hebrew	004
Indonesia	001-803-015-205-6011	Turkish	005
Ireland	1-800-948-326	Thai	006
Israel	1-809-349-106	Burmese	0001
Italy	800 743 075	Other	000
Kenya	0800-221-421		
Republic of Korea	00308 491 0178		

(Continue on next page)

Country	Direct number
Malaysia	1-800-81-3595
Macao	0-800-047
Mexico	800-681-5340
Netherlands	0800- 023-3064
New Zealand	0800 823 509
Nigeria	234 20 1 227 9141
Norway	800 62 472
Pakistan	92 51 8108918
Peru	0800-78317
Philippines	1-800-1-322-0072
Poland	0-0-800-141-0023
Portugal	800 180 273
Puerto Rico	833-203-3981
Russian Federation	8 (800) 100-63-14
Saudi Arabia	800 850 150
Singapore	800 49 22 583
Slovakia	0-800-606-674
South Africa	080 098 2093
Spain	900-963267
Sri Lanka	94-072-0987140
Sweden	020-12 74 52
Switzerland	0800 561 024
Taiwan	00-801-148-471
Tanzania	0800 12 0042
Thailand	1800014801
Turkey	800-493-126-4001
Uganda	0800 113230
United Arab Emirates	800 0320692
United Kingdom	0-808-189-0041
United States of America	833-203-3981
Vietnam	120-32121

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Language	Press
English	1
Spanish	2
French	3
Chinese	4
German	5
Italian	6
Portuguese	7
Japanese	8
Arabic	9
Hungarian	01
Polish	02
Dutch	03
Czech	04
Taiwanese	05
Korean	06
Tagalog	07
Vietnamese	08
Indonesian	09
Finish	001
Russian	002
Hindi	003
Hebrew	004
Turkish	005
Thai	006
Burmese	0001
Other	000

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Policy number:	SL-POL-003.001	Revision number:	3
Original effective date:	Aug. 1, 2014	Pages:	3
Revised effective date:	Jan. 31, 2023	Reviewed date:	Jan. 31, 2023

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## **SOLENIS POLICY**

### **Anti-harassment**

#### **1.0 Policy**

Solenis is committed to maintaining a work environment where people are treated with respect. In keeping with this commitment, Solenis will not tolerate the harassment of or by employees, applicants or others, including any supervisor, co-worker or non-employee.

It is Solenis' goal to ensure that behavior never rises to the level of unlawful behavior. Accordingly, this policy prohibits behavior that is not consistent with the workplace Solenis expects, even though it may not rise to the level of unlawful harassment, discrimination or retaliation.

#### **1.1 Definition of harassment**

Harassment consists of unwelcome or vexatious conduct, whether verbal, non-verbal or physical, that is based on a person's actual or perceived age, disability, gender, national origin, race, color, religion, sexual orientation, pregnancy, veteran status, genetic information or other category protected by law, and that affects an individual's employment or creates an intimidating, hostile, abusive or offensive working environment.

#### **1.2 Definition of sexual harassment**

Sexual harassment is a type of gender-based discrimination that includes, but is not limited to:

- making unwelcome sexual advances or requests for sexual favors or other verbal or physical conduct of a sexual nature as a condition of an employee's continued employment or advancement within the organization;
- making submission to or rejection of such conduct the basis for employment decisions affecting the employee; or
- engaging in offensive, abusive or threatening behavior that interferes with an individual's work performance or creates an intimidating, hostile, abusive or offensive working environment.

Conduct prohibited by this policy need not be motivated by sexual desire and includes gender-based harassment of a person of the same sex. Sexual harassment also includes engaging in a course of vexatious commentary or conduct against an employee in the workplace because of sex, sexual orientation, gender identity or gender expression where the course of comment or conduct is known or reasonably should be known to be unwelcome.

### 1.3 Examples of harassing behavior

Harassing behavior can be verbal, nonverbal, or physical. Examples of inappropriate behaviors include, but are not limited to:

- **Verbal** – sexual innuendo, suggestive or discriminatory comments, insults, threats, jokes about personal or physical traits, jokes of a sexual or demeaning nature, or sexual propositions.
- **Nonverbal** – suggestive or insulting noises, leering, whistling, obscene gestures, threatening gestures, and the posting or possession at the workplace of literature, calendars or pictures that are suggestive, revealing, demeaning or pornographic.
- **Physical** – unwelcome touching, pinching, brushing, rubbing or groping of the body, unnecessary closeness, threatening or intimidating actions, coercing sexual activity, and assault.

#### 1.3.1 Examples of situations to avoid:

- using belittling nicknames, even in humor
- insults
- bullying
- verbal aggressions
- discriminatory or racist comments
- criticizing an employee in a public area or in an open space, with intention to humiliate or alienate the employee from coworkers
- isolating or denying someone's presence
- belittling or trivializing someone's thoughts
- opposing or challenging everything someone says
- intolerance toward religious holidays, customs or traditions
- discrediting or spreading rumors about the victim.

### 1.4 Workplace relationships

A supervisor may not date or have any form of sexual relationship with an employee who reports through his or her management chain, even when the relationship is consensual. Activity of this sort will subject all involved to disciplinary action, up to and including termination.

### 1.5 Reporting a problem

It is every employee's responsibility to help maintain a work environment free from harassment. Employees who believe they have experienced or observed harassment must report the harassment immediately to their supervisor, their human resources representative, the Office of Ethics and Compliance and/or via Share Your Concern page on the intranet.

Each complaint will be investigated on a priority basis, with the investigation generally coordinated by the local human resources department, pursuant to Solenis' Investigations policy. Although Solenis must collect all relevant information as part of a complete investigation, every effort will be made to conduct the investigation on a confidential basis, with disclosure made only where required to conduct the investigation and/or implement any corrective action. If an investigation



confirms that harassment has occurred, Solenis will take prompt corrective action, including discipline up to and including termination. Decisions reached will, as appropriate, be communicated to those involved.

### 1.6 Retaliation is prohibited

Solenis encourages employees to raise questions or concerns regarding discrimination or harassment with their local Human Resources department. In accordance with the [Reporting policy](#), Solenis will not authorize or permit any form of retaliation against any employee who has made a good faith claim or report of harassment or who in good faith has provided information to Solenis during the investigation of a claim or report of harassment. Employees who believe that they have been retaliated against should immediately contact their supervisor, their Human Resources representative, the Office of Ethics and Compliance and/or via Share Your Concern page on the intranet.

### 2.0 Scope

Nothing in this policy is intended to create a contract of employment. This policy applies to all Solenis employees, vendors, contractors and consultants, with the exception of the employees who are subject to a collective bargaining agreement, to the extent the agreement contains provisions that conflict with this policy

### 3.0 Owner

Solenis' Chief Human Resources and Communications Officer is responsible for implementation of and amendments to, this policy.

### 4.0 Exceptions

There are no exceptions to this policy.

### Revision history

This is a history of notable changes to this policy.

Effective date	Section	Description of change
June 1, 2017	1.5	Update employee hotline and lighthouse.com contact information
	1.6	Revise to direct user to SL-POL-004-013 Non-retaliation
Jan. 31, 2022	Throughout	Revised throughout
Jan. 31, 2023	Throughout	Annual review; minor formatting revisions.

# Solenis 2025 Human Rights and Modern Slavery Due Diligence Report

## EXECUTIVE SUMMARY & KEY ACHIEVEMENTS

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Solenis is committed to ensuring and respecting human rights, including decent working conditions and combatting modern slavery, forced labour and child labour risks across our operations and supply chains. This report sets out Solenis commitments, policies and actions regarding human rights and modern slavery for 2025. During the reporting year, we made key progress to mature our approach to human rights:

- Solenis constructed a corporate-level **Human Rights Management Plan** that integrates existing policies, practices, and governance, and defines roles and responsibilities for the identification, management, and oversight of human rights issues
- We established a **cross-functional human rights working group** with responsibility for reviewing relevant policies and practices for alignment with international standards and best practices
- We built the **capacity of our employees** by developing and disseminating materials on human rights and modern slavery
- A range of key supply chain policies were updated, including the **Supplier Code of Conduct**, our **Global Procurement & Responsible Sourcing Policy** and our **Supplier Risk Assessment Protocol**.
- We undertook a human rights gap assessment to identify priority areas for improvement and to strengthen alignment with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- We developed a corporate-level **Human Rights Remedy Framework** that provides a structured and consistent approach for responding to, investigating, remediating and learning from concerns

These actions have strengthened foundations and established a systematic and outcomes-focused approach to human rights due diligence across Solenis' operations and supply chains. Additional policies, procedures, due diligence practices, certifications, and remediation mechanisms relating to human rights in our operations and supply chain are published in the **Sustainability and Regulatory Library** on our website.

Any person has the right to obtain information from Solenis regarding this report and how our approach to human rights and modern slavery due diligence:

- The **“Contact Us” page** on our website provides a direct communication pathway or questions and concerns can be shared via phone: United States and Canada: +1 833 203 3981 For other countries, click **[here](#)** for the access code and phone numbers.

Alternately, our confidential and anonymous online portal can be accessed **[here](#)**.

## 1. INTRODUCTION

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This Human Rights and Modern Slavery Due Diligence joint report “this report” has been prepared and submitted by Solenis Holding Limited (“Solenis” – United Kingdom, Company Number 14910669) and the entities that it controls, in accordance with the following requirements (“the Acts”):

- **Australia:** *Modern Slavery Act (Commonwealth) 2018, constituting a “Modern Slavery Statement” and a “joint statement” for the purposes of that Act*
- **Canada:** *Fighting Against Forced Labour and Child Labour in Supply Chains Act*
- **Norway:** *Norwegian Transparency Act (Åpenhetsloven)*
- **UK:** *Modern Slavery Act 2015*

Solenis Holding Limited is registered at 280 Bishopsgate, London, United Kingdom, EC2M 4AG, and is privately owned by Platinum Equity Advisors LLC (“Platinum”), headquartered at 360 N. Crescent Drive, Beverly Hills, California 90210, United States.

This report covers the reporting year October 1, 2024, to September 30, 2025 (“the reporting period”). This is a joint report made pursuant to the Acts by Solenis (Solenis Holding Limited (“Solenis” – United Kingdom, Company Number 14910669) on behalf of the entities listed in the Reporting Entities Appendix of this report “the reporting entities”. It outlines the steps and measures we have taken to prevent and reduce the risks of human rights risks, child labour, forced labour, modern slavery and human trafficking in our operations and supply chains. Any references to “we”, “Solenis”, “the Company”, “us”, “our” or description of risks, actions or relevant information are made with regard to all reporting entities, including those acquired through acquisition during the reporting period, unless otherwise stated. While the relevant Acts apply to specific jurisdictions, we report globally for completeness and continuity with prior reporting.

This report contains forward-looking statements. These are based on assumptions and expectations at the time of publication that are, by nature, subject to change in the future. These statements cannot be guaranteed or relied upon.

Solenis acquired NCH Corporation (NCH) in November 2025. Full integration into Solenis’ reporting processes is expected in future reporting years.

### 1.1 CONSULTATION AND REPORT DEVELOPMENT

This Report was developed through a multistep process, informed by:

- Review of legislative requirements across Australia, Canada, Norway, the United Kingdom, and the optional [International Reporting on Modern Slavery, Forced Labour and Child Labour Template](#).
- Review of Solenis’ available policies, management systems standards, procedures, supplier management tools and contracts, training resources, and records, along with grievance and reporting mechanism records.
- Input and review from relevant Solenis’ Human Rights Working group, subject matter experts, and senior leadership who provided context and confirmation of FY25 activities, ongoing challenges, and priorities for FY26.
- Independent analysis, review and support from an independent third party.

Solenis consulted with reporting entities in the development of the report as follows:

- Solenis, LLC consulted with all reporting entities it owns or controls through engagement with local legal and functional teams, who provided input on operations, practices, and FY25 activities relevant to modern slavery and human rights risks.

- Relevant corporate functions, including Legal, Human Resources, Procurement, Sustainability, and EH&S, contributed to and reviewed the content of this Report. The Solenis Human Rights Working Group and subject-matter experts provided oversight and validation.
- Senior leadership and the appropriate governing body of Solenis, LLC reviewed and approved this Report prior to publication. See Appendix for consultation, approval and attestation detail.

## 2. OUR STRUCTURE, OPERATIONS, ACTIVITIES, AND SUPPLY CHAINS

### 2.1 OUR STRUCTURE, OPERATIONS & ACTIVITIES

Solenis is a leading global provider of water and hygiene solutions committed to building a safer and healthier world through sustainable innovation. Key industries served include consumer, industrial, institutional, hospitality, food and beverage, and pool and spa water markets.

Solenis is headquartered in Wilmington, Delaware. Globally, the Company has 16,371 employees and 62 manufacturing sites. Our operations span approximately 160 countries and six continents, including the employees based in the reporting entities:

- 450 employees in Canada
- 859 employees in the UK
- 201 employees in Australia
- 122 employees in Norway

Solenis' product portfolio includes a wide array of water treatment chemistries, process aids, functional additives, cleaners, disinfectants, and state-of-the-art monitoring, control and delivery systems. These technologies are used by customers to improve operational efficiencies, enhance product quality, protect plant assets, minimize environmental impact, and create cleaner and safer environments.

Our global customers include paper mills, chemical processing plants, municipal water treatment plants, food and beverage facilities, healthcare, educational and hospitality institutions, managers of commercial and residential pools, and beyond.

Product / Service Line	Offerings
Commercial Cleaning	Building Care, Consumer Brands, Dilution Control Equipment, Diversey Consulting, Fabric Care, Floor Care, Infection Prevention, Kitchen Care, Personal Care, and TASKI Cleaning Machines.
Digital Solutions	Analyzers, Controllers, HexEval™ Performance Monitoring Program, Internet of Clean, OPTIX™ Applied Intelligence, and Solenis™ Cloud.
Food and Beverages	Bottlecare, Cleaning in Place, Conveyor Lubrications, Engineering, Equipment, Membrane Cleaning, Open Plant Cleaning, and Services.
Industrial Processes	Biorefining Process Aids, Corrosion Inhibitors, Defoamers, Microbiological Control Agents, Mineral Processing Aids, Oil & Gas Processing Aids, and Scale Inhibitors.
Pulp and Paper	Barrier Coatings, Colorants, Contamination Control Agents, Pulp Mill Additives, Retention & Drainage Aids, Sizing Agents, Strength Additives, Surface Treatments, and Tissue Making Additives.
Water Treatment	Boiler Water Treatments, Clearpoint™ Biofilm Detection & Control, Cooling Water Treatments, Raw Water Treatments, Recovery Boilery Treatments, Reverse Osmosis Membrane Treatments, and Wastewater Treatments.

For additional information about Solenis, please visit our website at [www.solenis.com](http://www.solenis.com)

## 2.2 OUR SUPPLY CHAIN

Solenis' supply chain consists of direct (materials suppliers) and indirect (consultants and services) Tier 1 suppliers. Our supply chain is integrated globally, and reporting entities are part of a global procurement process. While primary engagement is focused on Tier 1 suppliers, Solenis recognizes that salient human rights risks may also arise beyond Tier 1. Solenis therefore considers, where relevant, upstream supply chain tiers (including Tier 2 and Tier 3 through an N-tiering approach) as part of its risk screening approach.

In FY25, the reporting entities interacted with approximately 2,027 Tier 1 suppliers, including 700 goods and raw materials suppliers, and over 1,300 service providers.

The majority of our reporting entities' spend was with suppliers located in Canada, the United Kingdom, the United States, and Australia (32%, 23%, 22%, and 13%, respectively). The goods and services procured by the reporting entities, listed by order of spend, include:

- **Chemicals**, including chloralkali chemicals, polymers, surfactants, oils & solvents, and biocides, as well as contract manufacturing and tolling services.
- **Logistics**, including road and rail transportation, air and ocean freight, logistics services, and warehousing.
- **Commercial Services**, including Environmental, Health & Safety services, facilities maintenance and cleaning services, security services, and catering.
- **Construction**, including building materials, electrical and HVAC services, and third-party contractors.
- **Packaging**, including pallets, drums, bottles, labels, and corrugated cardboard.
- **Materials & Equipment**, including office and lab equipment and supplies, electrical and lighting materials, PPE, uniforms, and plant equipment maintenance, repair, and operations.
- **Information Technology**, including hardware, software, and services.
- **Fleet Management**, including leasing costs, repair and maintenance, and fuel.
- **Real Estate Services**, which consists primarily of leased office spaces.
- **Energy & Utilities**, including electricity, water, and gas.
- **Professional Services**, including audit and tax services, marketing and communications, and temporary labour and recruitment.

## 3. GOVERNANCE, POLICIES AND STANDARDS

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### 3.1 GOVERNANCE OVERSIGHT AND ACCOUNTABILITY

Solenis maintains robust sustainability governance practices to ensure material topics are managed at the highest level and we continue to evolve our approach to sustainability and human rights. Key mechanisms relevant to modern slavery and human rights governance are established in our Human Rights Management Plan and set out in the table below.

Our **Board of Directors** provides oversight, accountability, and strategic direction for Solenis' efforts to prevent and address modern slavery, forced labor, and human trafficking across our global operations and supply chains. Senior-level development and oversight of our human rights policies and assessment of modern slavery risks is embedded within Solenis' broader sustainability governance structure, led by the Chief Sustainability Officer and supported by multiple governance bodies including Solenis' Sustainability Task



Force Leadership Team and the **Human Rights Cross-Functional Working Group** (established during FY25).

The Working Group convenes relevant subject-matter experts from reporting entities and the global organization to evaluate risks, concerns, and coordinate actions on mitigation actions. Any escalation measures are routed through the Sustainability Leadership Team to the Executive Leadership Team and, when appropriate, the Board. Remediation responsibilities are shared among Human Resources, Legal, Employee Health & Safety, and the Office of Data Privacy, as detailed in Solenis' Internal Operations Human Rights Risk Assessment Policy. Supply chain human rights risks are governed through Solenis' Risk Management Program and managed by the Procurement Excellence team.

This governance framework applies to all entities owned or controlled by Solenis, LLC, including the reporting entities. Reporting entities implement Solenis' global policies and controls and escalate material risks through proper reporting channels, the Sustainability and Human Rights governance forums, the Executive Leadership Team and, as appropriate, to the Board. Risk assessment findings are integrated into our enterprise risk and sustainability processes, with responsibility across the organization.

## GOVERNANCE ROLES AND RESPONSIBILITIES RELEVANT TO MODERN SLAVERY AND HUMAN RIGHTS

Governance Body	Roles and Responsibilities
Board of Directors	<ul style="list-style-type: none"> <li>Provides oversight, accountability, and strategic direction for Solenis' efforts to prevent and address modern slavery, forced labor, and human trafficking across our global operations and supply chains</li> <li>Responsible for effective implementation and integration of our policies, controls and human rights practices</li> <li>Reviews and approves our Human Rights and Modern Slavery Due Diligence Report</li> </ul>
Operating Council	<ul style="list-style-type: none"> <li>Directs Solenis' business strategy and oversight</li> <li>Sets sustainability priorities and monitors progress</li> <li>Provides final review of annual sustainability results</li> </ul>
Solenis Leadership Team	<ul style="list-style-type: none"> <li>Leads the strategic planning process</li> <li>Reviews key initiatives supporting strategic goals</li> <li>Reviews and updates operating plans</li> <li>Reviews and approves the materiality matrix and corporate development efforts</li> </ul>
Solenis Leadership Council	<ul style="list-style-type: none"> <li>Manages and leads Solenis' day-to-day business operations</li> <li>Reviews and approves the sustainability strategy, goals, and materiality matrix</li> <li>Builds company commitment to human rights and a sustainability culture</li> <li>Ensures that company leadership is accountable for sustainability goals and progress</li> </ul>
Sustainability Leadership Team	<ul style="list-style-type: none"> <li>Develops the sustainability strategy and sets global ESG (including human rights) goals</li> <li>Drives company culture and education around ESG (including human rights)</li> <li>Leads ongoing data gathering and review</li> <li>Provides regular updates to the Operating Council, Solenis Leadership Council and Solenis Leadership Team on progress</li> </ul>
Human Rights Cross-Functional Working Group	<ul style="list-style-type: none"> <li>Established in 2025 to embed respect for human rights throughout the organization</li> <li>Comprising leaders from Legal, Human Resources, and Procurement</li> <li>Collaborates to ensure human rights upheld across our policies and business practices</li> <li>Meets at least monthly and regularly provide updates and escalates any issues to the Solenis Sustainability Leadership Team</li> </ul>
Legal Team and Office of Ethics and Compliance	<ul style="list-style-type: none"> <li>Provides legal, regulatory and international standards guidance</li> <li>Advises on legal risks, cross-border issues, and rights-compatible approaches</li> <li>Manages the Share Your Concern platform</li> </ul>

	<ul style="list-style-type: none"> <li>• Conducts or oversees investigations</li> <li>• Responsible for process integrity and alignment with the Code of Conduct and ethical standards</li> <li>• Monitors compliance and collects risk-related data through sources, including internal investigations and annual employee certifications of the Global Standards of Business Conduct. Data is processed within our Enterprise Risk Management approach and continuously informs revision of our policies, processes, training, and communications.</li> <li>• Responsible for direct engagement with workers, contractors, and community stakeholders. Where applicable, workers' unions and councils are engaged.</li> </ul>
Office of Data Privacy	<ul style="list-style-type: none"> <li>• Provides compliance with data privacy regulations</li> <li>• Manages data breach responses</li> <li>• Conducts regular privacy assessments to safeguard personal and organizational data</li> </ul>
Human Resources (HR)	<ul style="list-style-type: none"> <li>• Leads in employee-related cases</li> <li>• Responds to workforce issues involving harassment, discrimination, or retaliation</li> <li>• Implements corrective actions and promotes respectful workplace practices aligned with human rights principles</li> <li>• Creates and implements policies and training materials on non-discrimination, equal opportunity and safe work environment topics</li> </ul>
Site & Operational Management	<ul style="list-style-type: none"> <li>• Acts as frontline for issue identification and implementation of prevention and mitigation actions</li> <li>• Identifies and escalates concerns</li> <li>• Cooperates with local investigations</li> <li>• Engages directly with workers, contractors and community stakeholders</li> </ul>
Health & Safety (H&S)	<ul style="list-style-type: none"> <li>• Addresses H&amp;S concerns</li> <li>• Conducts regular safety audits</li> <li>• Reviews H&amp;S processes and procedures</li> <li>• Responsible for compliance with occupational H&amp;S and H&amp;S awareness</li> <li>• Audits and reviews controls at least annually, and in some cases on a more regular basis, to identify risks by testing and reviewing the effectiveness of the listed mitigation measures (Outlined in Pages 6-14 of the Internal Operations Human Rights Risk Assessment).</li> </ul>
Procurement / Procurement Excellence Team	<ul style="list-style-type: none"> <li>• Conducts supplier due diligence</li> <li>• Exercises leverage and enforces corrective action plans</li> <li>• Supports supplier capacity building and manages escalation process when suppliers are non-cooperative</li> </ul>

### 3.2 COMMITMENTS, POLICIES AND SUPPORTING DOCUMENTS

We are committed to implementing the [UN Guiding Principles on Business and Human Rights](#) (UNGPs) as well as the [OECD Due Diligence Guidance for Responsible Business Conduct](#) (OECD Guidelines). The UN Global Compact's (UNGC) Ten Principles are also reflected in our approach to due diligence implementation to proactively identify, prevent, mitigate and remediate potential and actual adverse human rights impacts we may cause or contribute to through our own activities or through our business relationships. In alignment with the UNGPs and the OECD Guidelines, we will also use our leverage to prevent or mitigate adverse human rights impacts we may be directly linked to across our operations and supply chain.

Responsible business conduct is embedded across our policies and management systems to promote respect for fundamental human rights and decent working conditions, and to prevent and reduce the risks of child labour, forced labour, modern slavery and human trafficking across our activities. These policies and processes apply to all reporting entities.

The policies and key procedures set out below, including the Human Rights Management Plan, were developed following internal consultation and external engagement including third-party expert human rights advisors. Policies are reviewed at a minimum every three years, or when there is a significant change in the

business, regulatory or operating context. We recognize enhancing engagement with external stakeholders as a future improvement area.

Our Global Standards of Business Conduct are available in 22 languages. Policy communication, enforcement and integration occur through training, employee onboarding, established management systems and commercial controls (specified in this report). Externally, we communicate and share our policies related to human rights, child and forced labour, and further information related to [Human Rights in our Supply Chain](#) and our [Supplier Risk Management Program](#) through a dedicated supplier page on our website and within our Sustainability and Regulatory Library.

Policy	Relevance to the Management of Human Rights Risks
<p><b><u>Human Rights Policy</u></b></p>	<ul style="list-style-type: none"> <li>• Sets expectations for all employees and third parties to uphold fundamental human rights and prohibits forced labour, child labour, discrimination and unsafe working conditions.</li> <li>• Aligned with international standards, including the Universal Declaration of Human Rights (UDHR), the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social and Cultural Rights (ICESCR), and the ILO Declaration on Fundamental Principles and Rights at Work, and applies across Solenis' operations and supply chain.</li> </ul>
<p><b><u>Child and Forced Labour and Human Trafficking Policy</u></b></p>	<ul style="list-style-type: none"> <li>• Prohibits child labour, forced labour, slavery and human trafficking across all Solenis operations and facilities.</li> <li>• Extends these requirements to suppliers and contractors, ensuring consistent standards across the supply chain.</li> </ul>
<p><b><u>Human Rights Management Plan</u></b></p>	<ul style="list-style-type: none"> <li>• Developed in FY25 to consolidate our Internal Human Rights Risk Assessment and Supplier Risk Assessment Protocol into a single enterprise framework aligned with the UNGPs and ILO Core Conventions.</li> <li>• Introduces a Remedy Framework to strengthen learning from grievances and prevent future human rights impacts.</li> </ul>
<p><b><u>Labor Practices Commitment</u></b></p>	<ul style="list-style-type: none"> <li>• Defines Solenis' expectations for fair and compliant labour standards across operations and the supply chain, including freedom of association, living wage, working hours and Occupational Health and Safety.</li> <li>• Reinforces Solenis' commitment to building an inclusive, safe and sustainable workplace.</li> </ul>
<p><b><u>Global Standards of Business Conduct</u></b></p>	<ul style="list-style-type: none"> <li>• Establishes ethical and legal expectations for all employees globally, including responsibilities relating to human rights, compliance and responsible behaviour.</li> <li>• Forms the foundation of Solenis' global compliance program and is overseen by the Office of Ethics and Compliance.</li> </ul>
<p><b><u>Responsible Care framework</u></b></p>	<ul style="list-style-type: none"> <li>• Guides Solenis' environmental, health, safety and security practices across all operations to ensure high performance and responsible business conduct.</li> <li>• Supports continuous improvement in risk management, compliance and operational excellence.</li> </ul>
<p><b><u>Supplier Code of Conduct</u></b></p>	<ul style="list-style-type: none"> <li>• Sets minimum human rights, labour and ethical requirements for all suppliers, including prohibitions on child labour, forced labour and human trafficking.</li> <li>• Aligned with Solenis' internal policies and international frameworks and integrated into all supplier contracts.</li> <li>• Updated in FY25 to improve supplier awareness of our grievance mechanism, Share Your Concern</li> </ul>
<p><b><u>Global Procurement &amp; Responsible Sourcing Policy</u></b></p>	<ul style="list-style-type: none"> <li>• Requires sourcing only from suppliers that prohibit child labour, forced labour, slavery or human trafficking, supporting responsible and ethical procurement.</li> <li>• Updated in December 2025 to strengthen purchasing controls, local content requirements and supplier risk management processes.</li> </ul>
<p><b><u>Supplier Risk Assessment Protocol</u></b></p>	<ul style="list-style-type: none"> <li>• Updated to incorporate recent enhancements consolidated in the 2025 revision, strengthening Human Rights Risk Due Diligence and reinforcing a risk-based, lifecycle approach to supplier risk management.</li> <li>• Applies an enhanced, tiered risk management approach, with proportionate due diligence and targeted mitigation measures for higher-risk suppliers to support continuous improvement.</li> </ul>

<p><b><u>Conflict Minerals Policy</u></b></p>	<ul style="list-style-type: none"> <li>• Commits to ensuring that the procurement of raw materials, intermediates and other goods complies with the U.S. SEC Conflict Minerals Rule (Section 1502 of the Dodd–Frank Act) and the EU Conflict Minerals Regulation.</li> <li>• Supports responsible sourcing practices by requiring suppliers to avoid minerals that finance armed conflict and to maintain traceability and due-diligence measures across their supply chains</li> </ul>
<p><b><u>Internal Operations Human Rights Risk Assessment</u></b></p>	<ul style="list-style-type: none"> <li>• Enterprise-wide, risk-based process to identify, assess, and manage human rights risks within Solenis' own operations, reviewed at least annually.</li> <li>• Informs mitigation, remediation, and escalation through Solenis' governance and enterprise risk management processes, aligned with international standards.</li> </ul>
<p><b><u>Hiring Due Diligence Protocol</u></b></p>	<ul style="list-style-type: none"> <li>• Establishes mandatory controls across recruitment, hiring, and onboarding to prevent child labour, forced labour, human trafficking, discrimination, and pay inequity.</li> <li>• Applies globally to employees, contractors, and temporary workers, supported by audits, training, and formal reporting and remediation mechanisms.</li> </ul>
<p><b><u>Community Relations Policy</u></b></p>	<ul style="list-style-type: none"> <li>• Outlines how we engage and collaborate with the communities where we operate.</li> </ul>

## 4. HUMAN RIGHTS DUE DILIGENCE

Solenis is committed to conducting human rights due diligence, defined as our efforts to assess, prevent, and mitigate human rights risks, including forced and child labour risks, within our operations and supply chains, in compliance with laws and regulations.

As set out in our Corporate Human Rights Management Plan (The Plan):

- 'Risk' is defined as the potential impact of our business on stakeholders and rightsholders that could occur in the future.
- 'Adverse Human Rights Impact' is defined as a negative effect on the enjoyment of human rights, caused, or contributed to by Solenis or linked to our operations, products, or services. An 'actual impact' refers to one that has already occurred.

Our overarching due diligence process is further detailed in the following sections. As of 2024, and as defined in The Plan we have identified salient human rights issues across our own operations and supply chain. We define 'salient' as the human rights at greatest risk of severe negative impact through Solenis' activities or business relationships. The topics identified are: freedom of association and collective bargaining, working conditions (including compensation, workplace environment and working time), child labor or other illegal forms of labor (including forced labor and human trafficking), employee health and safety, discrimination (including equal opportunity and vulnerable group protection), employee data security, community well-being, health and safety; and environmental impacts on people (including a clean environment)..

## 5. OWN OPERATIONS DUE DILIGENCE

Assessment of human rights and modern slavery risks in our operations consists of a range of processes, including merger and acquisition (M&A) assessments, governed by the **Internal Operations Human Rights Risk Assessment Policy**.

### 5.1 OWN OPERATIONS RISK ASSESSMENT AND MANAGEMENT

- We assess risks in operations at least annually, or more frequently as warranted by business, regulatory changes, or if risks are identified.

- Risk assessment applies an evaluation framework based on ‘likelihood’ (defined as probability of the risk occurring), and ‘impact’ (defined as the potential consequences, or severity of risk to the business). The definitions are informed by Solenis’ double materiality assessment (DMA), which considered financial and non-financial risks and impacts and gathered stakeholder input. Criteria are monitored and reassessed based on global developments. Aligning the definition of impact, risk matrix, and severity criteria to the UNGPs (to consider scale/scope/irremediability) is an identified improvement area for the next reporting year.
- Where our human rights assessment processes identify human rights or modern slavery risk areas in our operations, we establish actions to mitigate risks and prevent adverse impacts. Where risks/potential impacts are identified, Solenis determines our relationship to these risks (in alignment with the UNGPs, i.e., cause, contribute, directly linked), the root causes and drivers (e.g., policy gaps, supplier practices, operational pressures), and potential consequences for affected individuals or communities. This may include engaging with relevant stakeholders to understand context and lived experience. This informs prioritization of risks and design of prevention and mitigation measures.
- Our **Human Rights Management Plan** establishes mitigation measures that we have implemented for a range of identified risks, including labor and community risks.
- These processes are applied across Solenis operations, including the reporting entities outlined in this Report, through site level assessments, ongoing employee and workforce monitoring reporting, and M&A due diligence activities.

Our **Internal Operations Human Rights Risk Assessment Policy** outlines the key risks identified through the risk assessment process and the corresponding mitigation strategies we have adopted.

- We understand there are inherent human rights-related risks in the chemical industry, including occupational health and safety risks in the production, handling, and transportation of materials, as well as the use of contractors or temporary labour during maintenance, shutdowns, or peak activity periods, and the integration of newly acquired entities through M&A.
- Modern slavery risks are covered through consideration of forced, compulsory, and child labour, human trafficking, or other coercive or exploitative practices (e.g., debt bondage), working conditions, discrimination, freedom of association, and health and safety. As noted above, freedom of association and collective bargaining, working conditions, child labor or other illegal forms of labor are defined salient topics. The risks of forced or child labour in our directly employed workforce are considered as low.
- Broader human rights risk considerations include impact on indigenous or vulnerable communities, failure to respect cultural or indigenous rights, inadequate grievance and remedy mechanisms, lack of transparency or stakeholder engagement, and security or community health and safety incidents.
- Implemented mitigation measures include adherence to global labor standards and local employment laws across all operations, requiring third-party labor providers to follow Solenis’ labor standards, regular payroll audits and competitive benchmarking studies, supporting fair and transparent processes for union formation, recognition and engagement with employee representatives or advisory councils, site-specific community relations plans and provision of Share Your Concern, our confidential and accessible grievance mechanism.

### 5.1.1 SITE-LEVEL RISK ASSESSMENT AND MANAGEMENT

Every Solenis production site that supplies a product to a particular customer completes, where needed, a SEDEX self-assessment questionnaire (SAQ), aligned with the SEDEX Members Ethical Trade Audit (SMETA) pillars. The SAQ covers human rights, child labour, forced and involuntary prison labour, modern slavery, ethical recruitment, and labour conditions. Where on site audit identifies improvement areas, we set out corrective actions. For example, in FY25, a site with identified areas for improvement in safe and hygienic

working conditions and policies regarding work hours was given 60 days to implement corrective actions, verified by a follow-up audit.

### 5.1.2 WORKFORCE ASSESSMENT AND MANAGEMENT

We are committed to respecting human rights across our workplace, including in relation to employees, officers, contractors and temporary workers, and apply a globally standardised **Hiring Due Diligence Protocol** to help mitigate risks of forced labour, child labour, discrimination and human trafficking. The protocol sets out our recruitment and onboarding processes in line with our Global Standards of Business Conduct and Human Rights Policy, which addresses key human rights concerns. Ongoing monitoring and prevention measures include the following (with further progress and metrics set out in section 9.2):

- Age verification (100% new hires screened); voluntary employee termination rights; coverage of employees (37%) by unions or collective bargaining; and third party labour rights requirements.
- Review of gender and pay equity; partnerships with organizations that support employment of individuals with protected characteristics, expanding access to inclusive employment opportunities
- Reporting and tracking of occupational health and safety hazards and near-miss events through the EH&S Velocity portal. In total, more than 20,000 hazard IDs (proactive safety enhancements) were submitted and actioned, leading to corrective actions focused on PPE compliance, housekeeping improvements to prevent slips, trips, and falls, and enhanced equipment safety controls and inspections
- Routine checks and awareness raising activities with regard to data privacy and Ethics/Compliance, including dedicated Data Privacy and Ethics and Compliance Weeks for enhanced training and knowledge-sharing
- Issuing of Solenis' annual culture survey, which achieved 96% employee participation and reflected an improvement in overall employee satisfaction to 80% (from 78% year-over-year), providing an additional channel for employees to raise concerns and enabling corporate and managerial functions to assess potential risks and trends across key areas
- In the 104 countries where Solenis employees are covered by unions or works councils, we conducted more than 525 meetings with representative bodies in FY25. These meetings covered human rights topics such as working conditions (health and safety, working hours, and workload), changes in compensation mechanisms, restricting, social plans, return in work programs, and in Spain, a legally mandated Equality Plan.
- Maintenance of the Share Your Concern Portal. Noting that during the reporting period, no human rights violations were reported through the portal in relation to hiring or employment practices.

### 5.1.3 MERGERS AND ACQUISITIONS (M&A)

Solenis assesses human rights and modern slavery risks that may arise through M&A transactions prior to finalizing any formal agreement. The due diligence process, as detailed in our Human Rights Management Plan covers:

- the target company's labour and human rights practices
- compliance with international labour standards, including wages, working hours, freedom from child and forced labour and legal employment status, and
- the presence or absence of formal grievance mechanisms.

Once the business transaction is complete, Solenis takes a series of prevention and mitigation actions. These actions ensure alignment with our human rights standards and where needed, we implement remediation, as described in our Human Rights Management Plan. In FY25, 100% of new business transactions were

assessed for human rights risks. All identified risks were mitigated, and no remediation actions were required. For FY26, we have added additional M&A due diligence to ensure 100% of M&A transactions undergo human rights due diligence during pre-acquisition review.

## 6. SUPPLY CHAIN DUE DILIGENCE

Our supply chain due diligence and risk management approach is supported by a combination of policies, management programmes, assessment protocols, and technology, which together provide a structured and consistent framework for identifying, assessing, and addressing modern slavery and broader human rights risks across our supply chain.

### 6.1 SUPPLY CHAIN RISK ASSESSMENT APPROACH

Solenis identifies potential human rights and modern slavery risks in its supply chain through its Supplier Risk Management Program and complemented by our Supplier Risk Assessment Protocol. This Program includes supplier risk identification, screening, deeper due diligence, analysis, mitigation, and continuous monitoring and reporting, as represented in below process flow diagram:



Solenis' supplier risk management is supported by industry-leading technology tools (Interos, Coupa, Kharon and Tableau), which enable external risk screening, multi-tier supply chain visibility up to Tier 3, risk based due diligence and mitigation activities, targeted human-rights deep-dive checks, and consolidated reporting.

In 2025, we updated the Protocol to incorporate a new 'deep dive on Human Rights Due Diligence' and a reinforced risk-based, lifecycle approach to supplier risk management. This is supported by our use of third-party technologies, such as:

- Interos (Risk Identification and Screening Platform): Supported by Artificial Intelligence (AI), the platform is used to conduct initial risk screening of in-scope suppliers using external data sources and proprietary databases accessed through strategic partnerships. Interos also provides N-tier supply chain risk visibility up to Tier 3, where relevant, to support early identification of potential human-rights and modern slavery risks in upstream supply chain tiers and to inform subsequent due diligence, escalation and mitigation activities.
- Coupa (Risk Management Platform): This enables supplier due diligence through the collection of ESG information, including human rights and modern slavery risks. It requires formal acknowledgement of our Supplier Code of Conduct and manages ongoing risk mitigation activities, including tracking corrective action plans.
- Kharon (Human Rights Due Diligence): This enables a deep dive into Sanctions Screening & Human Rights Risks such as forced labor in global supply chains.

- Tableau (Risk Reporting): This enables the continuous flow of risk data to Procurement Professionals and Solenis Leadership for risk monitoring purposes to make more informed decisions.

During the reporting period, key actions to assess risk and improve supplier due diligence included:

- Continuous risk screening of in scope suppliers through Interos as part of the Supplier Risk Management Program. This included more than 600 direct tier 1 suppliers and 40,000 Non tier 1 suppliers in the reporting year. Interos scope is global and supplier-based, and therefore not limited to the Solenis entities or countries covered by this report.
- Annual human rights risk assessments for targeted suppliers based on country and industry-level, as detailed in Appendix B and C of our Supplier Risk Assessment Protocol, using international standards, guidance, and legislation to assess country and sector exposure to human rights, labor, and supply chain risks (e.g., OECD Conflict-Affected and High-Risk Areas and ILO Standards). The full list of data sources used for country and industry risk classification and resulting risk scores is included in the Protocol.
- Ongoing supplier requirements to accept and comply with our Supplier Code of Conduct or maintain equivalent principles in their own code (submitted to Solenis Legal team review).
- In FY25, Solenis enhanced its Supplier Risk Management Program, transitioning from the legacy Global Risk Management Solutions (GRMS) platform to a more robust, integrated approach combining Interos risk intelligence and the Coupa supplier risk management platform.

## 6.2 INHERENT SUPPLY CHAIN RISK FACTORS

The review of FY25 supplier data identified potential inherent human rights risks related to suppliers' locations, sectors, and products or services supplied to Solenis.

The risks described here are potential or inherent based on key human rights and modern slavery indicators present in these countries and sectors. They are general in nature and do not represent specific issues or practices found in our procured products or services. In addition to this analysis, we continuously assess inherent risks as part of supplier screening.

### 6.2.1 GEOGRAPHIC RISK

Solenis' Tier 1 suppliers operate across multiple geographies with varying levels of human rights and modern slavery risk exposure. In accordance with the Supplier Risk Assessment Protocol (Annex C), and supported by third-party subject-matter expert (SME) review, a subset of countries has been identified for country-level risk assessment.

The following 18 countries are those assessed and classified within the Risk Protocol as presenting low, medium, or high/critical risk:

- Low-risk countries: Canada, Australia, Norway, Germany, Netherlands, Sweden, Japan, Finland, Italy, Romania.
- Medium-risk countries: the United States, Indonesia, India, Kenya, and Thailand.
- High / Critical-risk countries: China, Vietnam, and Turkey.

### 6.2.2 PRODUCT AND SECTOR RISK

Elevated risk indicators were identified in the following areas, and are aligned with Solenis' industry risk classification in the Supplier Risk Assessment Protocol:

Product	Industry	Relevance to Solenis	Risk Indicators
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Caustic soda	Extractives	Caustic soda is a commodity chemical, used in the production of our cleaning and water treatment products.	Identified as a high-priority sector under the UFLPA due to production in high-risk regions and associated forced-labour exposure.
Aluminium / bauxite	Extractives	Aluminium-based chemicals are used in water treatment and paper manufacturing products.	Solenis' aluminum-based products carry upstream risks stemming from bauxite mining. These risks include forced resettlement, low wages, and adverse impacts on local communities and land rights in major bauxite-producing regions.
Silica	Extractives	Silica is used in water treatment products and has similar risks due to upstream mining activities.	Risks include forced and child labour in extraction, health and safety issues across the supply chain, and sourcing from high-risk or conflict-affected areas. <sup>1</sup>
Electronics	Electronics & ICT	Solenis purchases IT hardware, including PCs, tablets, servers, and hardware accessories and parts to support day-to-day operations.	Documented upstream exposure to forced and child labour, including manufacturing in high-risk geographies, and conflict-mineral supply chains.
Petrochemicals	Chemical Industry	Petroleum-derived chemicals are used in Solenis products by way of synthetic polymers, surfactants, and chemical feedstocks.	Labour-rights risks in oil and gas extraction and potential significant community health impacts near petrochemical operations.
Rosin/forestry inputs	Agriculture	Rosin, used by Solenis in the form of rosin adducts and tall oil resins, is a natural pine resin whose byproducts are used in paper sizing agents, adhesives, and coatings.	Vulnerabilities include seasonal and migrant labour exploitation, recruitment-fee risks, subcontracting opacity, and Indigenous land-rights issues.
Ocean freight and logistic third-party services	Transportation & Logistics	Solenis' spend includes several modes of transportation, including road, rail, and air; however, ocean freight has higher risks of human rights risks.	High-risk indicators include recruitment-fee debt bondage, withheld wages, <sup>2</sup> excessive working hours, and reduced labour oversight due to flag-of-convenience practices. <sup>3</sup>
Third-party cleaning, facilities maintenance, and security	Hospitality	Solenis outsources these services as part of routine facility management.	High risk exposure is based on the presence of vulnerable migrant workers, wage theft, subcontracting, including in 'low risk' jurisdictions.

### 6.3 SUPPLIER RISK MANAGEMENT PROGRAM

The following table sets out the core practices in our Supplier Risk Management Program, which was enhanced substantially during FY25.

Stage	Action
<b>1. Supplier Risk screening, identification, and scoring</b>	<ul style="list-style-type: none"> <li>• Solenis classifies suppliers using the Interos platform (adopted during the reporting period), which sets out:               <ul style="list-style-type: none"> <li>○ Risk scoring based on the nature and potential severity of risks (including ESG, human rights, cyber, financial, geopolitical)</li> <li>○ 40k+ Non tier 1 suppliers screened in FY25</li> </ul> </li> </ul>

<sup>1</sup> [RBC risks and impacts in sand and silicate supply chains: Due Diligence for Responsible Sand and Silicate Supply Chains | OECD](#)

<sup>2</sup> [IHRB - Seafarers and Illegal Recruitment Fees: 2024 Insights](#)

<sup>3</sup> [The risks of modern slavery in maritime supply chains | Global law firm | Norton Rose Fulbright](#)

	<ul style="list-style-type: none"> <li>○ 600+ direct material suppliers representing &gt;70% of direct spend have been screened in FY25. Interos scope is global and supplier-based, and therefore not limited to the Solenis entities or countries covered by this report. As a result, supplier data reflects those included in the Supplier Risk Program based on defined risk criteria, irrespective of geography.</li> </ul>
<p><b>2. Enhanced risk diligence (high-risk suppliers)</b></p>	<ul style="list-style-type: none"> <li>• Following screening using the Interos Platform, any Tier 1 supplier that is identified with a potential risk of human rights violations will prompt a secondary in-depth due diligence investigation through Kharon, reported in Coupa.</li> <li>• Following monitoring: when a supplier receives a high or extreme risk score in the Interos screening platform, Solenis: <ul style="list-style-type: none"> <li>○ Initiates through Coupa deeper due-diligence using domain-specific questionnaires developed by Category Leads, the Supplier Risk team, and Subject Matter Experts;</li> <li>○ Requests additional supplier documentation;</li> <li>○ May conduct on-site assessments if desk-based verification is insufficient.</li> </ul> </li> <li>• Regardless of the risk screening outcome, all direct suppliers classified as Strategic Chemical suppliers, located in critical or high-risk countries operating in high-risk industries (as defined in Appendix C of our Supplier Risk Assessment Protocol), will be subject to an ESG due diligence review every 12 months, or sooner if there are significant business changes.</li> </ul> <p>Coupa platform was adopted during the reporting period.</p>
<p><b>3. Continuous Supplier risk monitoring</b></p>	<ul style="list-style-type: none"> <li>• Inherent risk scores are continuously monitored through Interos. Solenis utilizes the Interos risk screening platform to support continuous risk monitoring for: <ul style="list-style-type: none"> <li>○ ESG risks, including human rights</li> <li>○ Sanctions/UFLPA exposure;</li> <li>○ Other risks including geopolitical, cyber, and financial risks.</li> <li>○ Alerts flag elevated risk levels and Tier-1 red flags trigger deeper review.</li> </ul> </li> </ul>
<p><b>4. Corrective action and supplier management</b></p>	<ul style="list-style-type: none"> <li>• Solenis utilizes the Coupa risk platform to support risk mitigation as follows: <ul style="list-style-type: none"> <li>○ Solenis assigns detailed corrective action plans (CAPs) with defined timelines based on the results of the enhanced due diligence initiated by Coupa.</li> <li>○ Suppliers must provide evidence of improvement to maintain approved status, and automated reminders are issued through Coupa.</li> <li>○ For ESG and human rights-related risks, suppliers must demonstrate progress within 45 days, or we will take escalatory steps.</li> <li>○ Failure to improve may lead to new-business hold or identification of alternate suppliers.</li> </ul> </li> </ul>
<p><b>5. Contractual controls and compliance verification</b></p>	<ul style="list-style-type: none"> <li>• Solenis embeds human-rights expectations through standard sustainability clauses in supplier contracts, which include: <ul style="list-style-type: none"> <li>○ Mandatory adherence to the Solenis Supplier Code of Conduct and Human Rights &amp; Anti-Slavery Policy;</li> <li>○ Explicit prohibition of forced, compulsory, and child labour across suppliers' operations and supply chains;</li> <li>○ Requirement for suppliers to implement due diligence procedures on their own suppliers and subcontractors;</li> <li>○ Obligation to promptly notify Solenis of any actual or suspected breaches of anti-slavery requirements</li> <li>○ Suppliers must cooperate with audits, provide supply chain transparency, report breaches, and are subject to corrective actions up to and including contract termination for non-compliance</li> </ul> </li> <li>• We have implemented a risk exposure assessment for all supplier contracts in scope, to ensure potential risks are identified before supplier onboarding and then managed through our Contract Life Cycle Management process.</li> </ul>
<p><b>6. Supplier engagement (communication and support)</b></p>	<ul style="list-style-type: none"> <li>• Solenis engages suppliers through: <ul style="list-style-type: none"> <li>○ 652 direct suppliers onboarded to the Coupa Portal;</li> <li>○ 3 webinars on Coupa and supplier-risk processes including the biannual Supplier Risk webinar (inviting 149 suppliers);</li> <li>○ One-on-one supplier meetings;</li> <li>○ 139 annual supplier feedback surveys (Voice of Supplier)</li> <li>○ 94 supplier performance scorecards</li> </ul> </li> </ul>

<b>7. Leadership oversight and escalation route</b>	<ul style="list-style-type: none"> <li>• The Procurement Excellence Director and Leadership Council oversee the Supplier Risk Management Program.</li> <li>• An independent third-party verifies supplier-screening data annually</li> <li>• Findings inform continuous-improvement actions.</li> </ul>
<b>8. Link to grievance and remedy</b>	<ul style="list-style-type: none"> <li>• Suppliers and workers can report concerns via Share Your Concern (24/7 anonymous hotline + web portal).</li> <li>• Reports feed into Solenis' investigation and remediation processes (see Section 7.2).</li> </ul>

## 7. STAKEHOLDER ENGAGEMENT AND REMEDIATION

### 7.1 STAKEHOLDER ENGAGEMENT

Stakeholder engagement is integral to achieving our sustainability and human rights commitments. Our sustainability leadership reviews key stakeholders and our engagement approach annually. We proactively create dialogue with our stakeholders to assess and gain insight into the environmental, social, and governance issues that we face internally and externally, including human rights. Our [2025 Sustainability Report](#) provides further details.

#### 7.1.1 COMMUNITY AND EMPLOYEE ENGAGEMENT

In FY25, we developed and published our **Community Relations Policy**, which outlines, at a site level, how we proactively engage and collaborate with the communities where we operate. Each production location with 10 or more people is required to have a Community Relations Plan, reviewed at least annually by senior site leaders for results and updates. These plans reflect the needs of the local stakeholders and vary according to our operation profile. Local stakeholders are identified through a structured assessment process, including community mapping and engagement with local authorities and organizations.

- Vulnerable groups, such as low-income households, Indigenous populations, or marginalized communities, who may be at greatest risk of potential or actual human rights impacts from our operations, are prioritized for engagement.
- Community and employee engagement occurs through meetings, open houses and suggestion programs.
- Additional employee engagement occurs during meetings with unions and works council representatives.
- All external stakeholders have access via our Share Your Concern reporting platform (see Grievance Mechanisms for more details).

#### 7.1.2 SUPPLIER ENGAGEMENT

Solenis regularly engages with suppliers on human rights due diligence through one-on-one meetings and through supplier performance scorecards. We also request annual supplier feedback through online surveys (Voice of Supplier) to identify potential areas for improvement and collaboration opportunities.

#### 7.1.3 INDUSTRY AND CUSTOMER ENGAGEMENT

In addition to engaging with local affected communities and suppliers, Solenis actively engages with NGOs and industry initiatives focused on modern slavery and human rights. In FY25, we engaged with Sustenuto to demonstrate Gold Level conformance with the Social Fairness pillar of Cradle to Cradle (C2C) Certification. As part of this engagement, we updated our Human Rights Policy to reflect our commitment to respect human rights established in the International Bill of Human Rights.

We also collaborate with our customers to build an understanding of human rights risks. For example, we supported our hospitality customers and communities by conducting Anti-Sexual Exploitation of Children in Travel and Tourism (Anti-SECTT) awareness training programs for hospitality employees around the world. The program equips hotel staff with the tools to identify signs of child sexual abuse, intervene safely and effectively, and report concerns to local authorities. Since 2014, hundreds of hotel workers across more than 22 countries have received this training. It is developed and led by a senior Solenis employee who is also a child protection advocate with the International Child Protection Network (ICPN). Local representatives from our company are involved in setting up the training for their customers.

## 7.2 GRIEVANCE AND REMEDIATION

### 7.2.1 GRIEVANCE MECHANISMS

Solenis offers a dedicated grievance and reporting mechanism to effectively address concerns, in accordance with our **Reporting Policy**, **Share Your Concern**, our 24-hour anonymous and confidential reporting platform, is accessible to all employees, business partners, communities and any other stakeholder to submit reports on compliance-related matters, potential breaches of our Global Standards of Business Conduct and supporting policies, or potential legal violations. Stakeholders can submit written reports or find telephone numbers to make verbal reports, with translation services available in 34 local languages. Share Your Concern is managed by an independent third-party to preserve anonymity and provides the ability to follow up on any previously submitted reports. The platform is publicly available on our website, in the Global Standards of Business Conduct, and in supporting policies.

Employees are similarly encouraged to share concerns, initiate complaints, or ask questions by speaking with line managers, Human Resource managers, directly with our Office of Ethics and Compliance or Legal Department. We also provide specific internal resources for suppliers and their employees to ask questions, request information or report concerns confidentially through a dedicated e-mail resource.

### 7.2.2 REMEDIATION

When adverse human rights impacts are identified within Solenis' operations, we take appropriate and proportional remediation measures to address the issue, support affected individuals, evaluate due diligence processes, and prevent recurrence.

As laid out in our Human Rights Management Plan, once Solenis' level of **potential involvement** in an identified existing or potential harm is determined, we then implement proportionate measures to cease or prevent the impact and apply appropriate mitigation or remediation measures. This involves assessment of whether Solenis caused, contributed to, or is directly linked to the harm through its operations, supply chain, or business relationships, in line with UNGPs.

In FY25, we developed our **Remedy Framework** to strengthen responses to human rights and modern slavery concerns, with implementation planned for FY26. Our approach and framework are aligned with the UNGPs, and we recognize that effective remediation is a critical component of our broader human rights approach. Our Human Rights Remedy Framework will be annually evaluated based on 10 operating principles and KPIs, specified in our Human Rights Management Plan.

Alongside development of our Remedy Framework in FY25, we continued to follow our process for conducting internal investigations and taking remedial actions regarding non-compliances, misconduct, or violations in an appropriate, confidential, and expeditious manner, as guided by our **Investigations Policy**, Investigations Protocol and Investigations Toolkit.

Investigations can result in remediation measures to address violations and correct non-compliances, such as training or corrective actions, and may result in disciplinary action up to and including termination of

employment. Together, the Reporting Policy and Investigations Policy provide a framework for ensuring non-retaliation against those who initiate a complaint.

Our **Remediation Pathway** outlines the structured process we follow when a concern is raised, beginning with the submission of a grievance through our Share Your Concern platform or the other channels described above, and continuing through the initial response to investigation, remedy, engagement and prevention. Findings from our internal investigations process directly inform the scale and type of remedy implemented.

**Remediation measures** may include different forms of compensation or remedies for any violations, including, but not limited to, formal apologies or restitution, financial or non-financial compensation, disciplinary measures for responsible parties, training, reinstatement of affected workers, access to support services, or policy and process reforms to prevent recurrence. We provide specific examples of targeted remediation measures for human trafficking and forced or child labour in our Internal Operations Human Rights Risk Assessment and Due Diligence Protocol.

We did not receive any reports or incidents from employees or stakeholders through our grievance mechanism or other channels related to any form of modern slavery, child or forced labour or other human rights impact in FY25.

## 8. TRAINING AND CAPACITY BUILDING

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### 8.1 TRAINING FOR EMPLOYEES AND CONTRACTORS

Our **Annual Training and Communication Plan** sets out mandatory annual training requirements for all employees globally on key compliance areas, including key topics such as modern slavery covered under our Global Standards of Business Conduct, and our policies.

Employees are required to review and certify their compliance with mandatory trainings annually, as specified in our Human Rights Management Plan. Training materials cover the Global Standards of Business Conduct, EU General Data Protection Regulation and Global Workplace Harassment Prevention for Managers. Each year, employees must certify their compliance. The Office of Ethics and Compliance actively follows up on all outstanding certifications, and continuously looks for process improvement opportunities. Starting in 2024, these compliance trainings were also made available to contractors.

In FY25, employee completion rate of mandatory training was greater than 70%.

Additionally, we utilize the **Procurement Learning Journey**, a platform that summarizes all the skillsets and knowledge we expect our Global Procurement team members to grow and develop, which includes annual training on sustainability, human rights, supplier Code of Conduct policy and supplier risk management. The Procurement Learning Journey had a 100% attendance rate in FY25 and is reviewed annually.

In FY25, we launched a dedicated mandatory Human Rights Procurement Training module which includes six lessons covering human rights, supplier obligations and due-diligence expectations. Training was completed by 100% Global Procurement team (170 employees). Specific modern slavery topics included lessons on forced labour, best practice and excessive working hours. The training material was developed by our Office of Ethics and Compliance.

### 8.2 SUPPLIER CAPACITY BUILDING

We proactively engage with our business partners to increase risk awareness, build capacity and foster compliance. We launched and onboarded 652 suppliers to the Coupa Supplier Portal in FY25 which requires supplier acknowledgement of our Supplier Code of Conduct and completion of an ESG enrollment questionnaire. As part of the portal launch, we hosted 3 Coupa Supplier webinars increasing communication

and understanding of Coupa, including the biannual supplier webinar focused on our Supplier Risk Management Program (inviting 149 suppliers).

## 9. ASSESSING EFFECTIVENESS

### 9.1 PERFORMANCE GOVERNANCE AND CONTINUOUS IMPROVEMENT

Solenis monitors the effectiveness of its human rights and modern slavery approach through a combination of governance reviews, internal assessments, supplier-risk monitoring, and independent verification. Monitoring assessments are conducted at least annually for in-scope activities outlined in the Internal Operations Human Rights Risk Assessment and the **Supplier Risk Assessment Protocol**. Effectiveness is evaluated using criteria within the Human Rights Management Plan, aligned with the UNGP Reporting Framework, and applied during FY25.

At the operational level, findings from human-rights assessments, investigations and remediation activities are reviewed by relevant internal functions and incorporated into enterprise-risk and sustainability processes. Significant developments may be escalated to governing bodies as appropriate.

Within the supply chain, effectiveness is reinforced through the Supplier Risk Management Program, with oversight by the Solenis Leadership Council and accountability held by the Procurement Excellence Director. Solenis also engages a third-party service provider to conduct annual verification of supplier-screening data, with results used to inform continuous improvement efforts.

Performance is tracked using internal KPIs, supplier-engagement metrics, and external assurance of sustainability disclosures. Solenis discloses human-rights and modern-slavery-related information annually through its externally assured Sustainability Report, supported by an ESG Data Table and GRI Content Index.

### 9.2 KEY TARGETS, INDICATORS AND KEY ACHIEVEMENTS

Solenis has set the following targets to further strengthen the effectiveness of our human rights supply chain due diligence by 2030:

- 90% of our direct supplier spend meets our Sustainability requirements, including human rights-related, by acknowledging the Supplier Code of Conduct
- 70% of our direct supplier spend is covered by a recognized external or internal sustainability assessment (including human rights due diligence)

The table below sets out key achievements and relevant indicators or metrics for the reporting period (FY25):

Area	FY25 Results
Operations: human rights assessments	<ul style="list-style-type: none"> <li>• 100% of new hires screened for child labor risks</li> <li>• 100% of operations assessed within last three years</li> <li>• 100% of identified risks (where applicable) had mitigation actions implemented.</li> </ul>
Operations: incidents reported	<ul style="list-style-type: none"> <li>• No reports or incidents of forced labour, child labour, or other human rights impacts received through grievance channels or other mechanisms in FY25.</li> </ul>
Living wage progress	<ul style="list-style-type: none"> <li>• Continued reduction of identified living wage gaps through participation in engagement with the Fair Wage Network and monitoring of compensation levels.</li> </ul>
Supplier ESG assessments	<ul style="list-style-type: none"> <li>• +70% of direct spend suppliers screened for ESG risk (including child or forced labor)</li> <li>• 216 direct suppliers assessed for ESG risk (including child or forced labor)</li> </ul>

	<ul style="list-style-type: none"> <li>• 15 direct suppliers identified as potentially high-risk</li> <li>• 100% of these suppliers were engaged, and mitigation plans implemented</li> <li>• 48% of direct-spend suppliers covered by a recognized external or internal sustainability assessment.</li> </ul>
Supplier Code of Conduct acknowledgement	<ul style="list-style-type: none"> <li>• 53% of direct-spend suppliers acknowledged the Supplier Code of Conduct.</li> </ul>
Supplier onboarding (Coupa Portal)	<ul style="list-style-type: none"> <li>• 652 direct suppliers onboarded</li> <li>• 3 webinars on Coupa and supplier-risk processes including the biannual Supplier Risk webinar</li> </ul>
Supplier corrective actions	<ul style="list-style-type: none"> <li>• All identified potential high-risk suppliers (15) had mitigation plans implemented and monitored to completion.</li> </ul>
C2C Social Fairness engagement	<ul style="list-style-type: none"> <li>• Continued engagement with Sustenuto to demonstrate CradletoCradle (C2C) Social Fairness Gold level conformance.</li> </ul>
Anti-SECTT training for customers	<ul style="list-style-type: none"> <li>• Delivered Anti-Sexual Exploitation of Children in Travel and Tourism (Anti-SECTT) awareness training to hospitality clients.</li> </ul>
Grievances and remediation	<ul style="list-style-type: none"> <li>• No reports of modern slavery or child/forced -labour concerns identified</li> <li>• Remediation processes updated through development of the Remedy Framework (implementation planned FY26).</li> </ul>
Human Rights Due Diligence system improvements	<ul style="list-style-type: none"> <li>• Cross-functional human rights working group established</li> <li>• Introductory human rights/modern slavery materials disseminated</li> <li>• Human rights gap assessment completed</li> <li>• Human Rights Management Plan developed</li> <li>• Remedy Framework developed</li> <li>• Human rights assessments and direct targeted suppliers risk screening processes integrated into dashboards and continuous improvement cycles.</li> </ul>

For our disclosure performance against GRI, see Appendix 13.

## 10. FUTURE FOCUS AND COMMITMENTS

Building on this foundation, in FY26 we intend to:

- Publish and fully implement our corporate-level Human Rights Management Plan.
- Publish, fully implement our Human Rights Remedy Framework and track progress against defined KPIs.
- Works towards obtaining Living Wage Certification through Fair Wage Network by 2027. Achieving certification will independently validate that employees across our workforce are paid a living wage, reinforcing our broader objective of maintaining fair, equitable, and responsible compensation practices globally.
- Join the UN Global Compact Business and Human Rights Accelerator and Sustainable Procurement Roundtable to align our approach further with the UNGPs, demonstrating our continued investment in building a more responsible and people-centered operations and supply chain.

## 11. APPROVAL & ATTESTATION

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For the purposes of our reporting under:

- Section 11 of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*
- Section 54 of the UK's *Modern Slavery Act 2015*
- Section 14 of Australia's *Modern Slavery Act 2018*,
- Section 5 of the *Norwegian Transparency Act (Åpenhetsloven)*

Entities reporting under specific modern slavery and transparency laws are listed in full in Appendix 12. Operations and locations covered by such laws are as follows:

- Australia: Solenis Australia Pty Ltd, Diversey Australia Pty Limited
- Canada: Solenis Canada ULC, Diversey Canada, Inc., Innovative Water Care Canada, Inc.
- Norway: Solenis Norway AS, Lilleborg AS
- United Kingdom: Solenis UK Limited, Diversey Limited, Solenis Holding Ltd

This Statement was approved on March 25, 2026, by the combined Solenis Holding Ltd Board.

The Statement has been signed by the Chief Sustainability Officer as set out in the Attestation below.

In order to prepare the statement, we consulted with the reporting entities and relevant companies we own or control. Reporting entity governing body approval is set out below.

### 11.1.1 ATTESTATION

*In accordance with the requirements of Section 11 of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, Section 54 of the UK's Modern Slavery Act 2015, Section 14 of Australia's Modern Slavery Act 2018, and Section 5 of the Norwegian Transparency Act (Åpenhetsloven), I, in the capacity of Chief Sustainability Officer, attest that I have reviewed the information contained in the report on behalf of the governing body of the entities listed in Appendix 12. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed within this report.*

Signature: /s/ Dr. Lotta Kanto Öeqvist

Name: Dr. Lotta Kanto Öeqvist

Position: Chief Sustainability Officer

Date: March 25, 2026.

This Report is signed by the Chief Sustainability Officer on behalf of Solenis' Board of Directors, who delegated authority to the Chief Sustainability Officer, who has the authority to bind Solenis and sign on their behalf.

### 11.1.2 AUSTRALIA

*In accordance with section 13 of the Modern Slavery Act 2018 (Cth), this Statement constitutes the modern slavery statement for the financial year ending September 30, 2025. It was approved by the Boards of Directors of each reporting entity covered by this Statement and listed in Section 12.1, in their capacity as principal governing body in March 2026.*

Solenis Australia Pty Ltd

Signature: /s/ Theodore L. Kelly

Name: Theodore L. Kelly

Position: Board of Directors

Date: March 31, 2026.

Diversey Australia Pty Limited

Signature: /s/ Deborah Walker

Name: Deborah Walker

Position: Board of Directors

Date: March 25, 2026.

### 11.1.3 CANADA

For the purposes of reporting under the Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, this Statement was approved by the Board of Solenis Holding Limited, on behalf of all Canadian reporting entities in the Solenis Group listed in Appendix 12.2, on March 25, 2026.

An attestation, as required by the Canadian Act, is detailed above.

### 11.1.4 UNITED KINGDOM

This Statement was approved by the Board of Solenis Holding Limited on behalf of the *Modern Slavery Act 2015* reporting entities listed in Appendix 12.3:

Signature: /s/ Cornelis Floor Saarloos

Name: Cornelis Floor Saarloos

Position: Board of Directors

Date: March 25, 2026.

### 11.1.5 NORWAY

The 2025 Modern Slavery Transparency Statement was endorsed and approved by the Board of Directors of Lilleborg AS on behalf of the reporting entities listed in Appendix 12.4 on the date: March 30, 2026.

## 12. APPENDIX – REPORTING ENTITIES

### 12.1 AUSTRALIAN REPORTING ENTITIES

Reporting Entity	ACN	Registered Address	Activities, Operations, Ownership
Solenis Australia Pty Ltd	169 325 151	1612 Centre Road, Springvale 3171 Victoria Australia	Same as registered address
Diversey Australia Pty Limited	080 527 117	Unit 8, 55-57 Newton Road Wetherill Park NSW 2164	Same as registered address

### 12.2 CANADIAN REPORTING ENTITIES

Reporting Entity	BN	Registered Address	Activities, Operations, Ownership
Solenis Canada ULC	806311437	1741 Lower Water Street, Suite 600, Halifax, Nova Scotia B3J 0J2, Canada	Address: Same as registered address Designation: Manufacturing, Sales/Marketing/Distribution
Diversey Canada, Inc.	887983773	6150 Kennedy Rd. (Unit 3) Mississauga ON L5T 2J4, Canada	Address: Same as registered address Designation: Sales/Marketing/Distribution
Innovative Water Care Canada, Inc.	873480420	Brookfield Place, Suite 2100, 181 Bay Street, P.O. Box 874, Toronto, ON, L5T 2J4, Canada	Address: Same as registered address Designation: Purchasing/procurement, sales/marketing/distribution

### 12.3 UNITED KINGDOM REPORTING ENTITIES

Reporting Entity	Company Number	Registered Address	Activities, Operations, Ownership
Solenis UK Limited	09017628	Pyramid Close, Weston Favell, Northampton, United Kingdom, NN3 8PD	Alfreton Trading Estate, Wimsey Way, Somecotes, Derbyshire
Diversey Limited	03459907	Diversey Limited Pyramid Close, Weston Favell, Northampton, United Kingdom, NN3 8PD	Diversey Limited Pyramid Close, Weston Favell, Northampton, United Kingdom, NN3 8PD
Solenis Holding Ltd		280 Bishopsgate, London, United Kingdom, EC2M 4AG	280 Bishopsgate, London, United Kingdom, EC2M 4AG

### 12.4 NORWEGIAN REPORTING ENTITIES

Reporting Entity	Org Number	Registered Address	Activities, Operations, Ownership
Solenis Norway AS	913499654	c/o Intertrust (Norway) AS, Wergelandsveien 7, 0167 Oslo, Norway	Gråterudveien 15, 3036 Drammen, Norway (Office)

Lilleborg AS

925745855

Hoffsveien 21  
0275 Oslo

Hoffsveien 21, 0275 Oslo, Norway (Office + Lab)

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## 13. APPENDIX – DISCLOSURE ALIGNMENT WITH INTERNATIONAL FRAMEWORKS

Solenis annually discloses performance data related to governance, risk management, due diligence, and compliance initiatives pertaining to human rights, child labour and forced labour. These disclosures are included in the Company's externally assured FY25 **Annual Sustainability Report**, which contains a dedicated Environmental, Social and Governance (ESG) Data Table and Global Reporting Initiative (GRI) Content Index.

We have mapped our priority sustainability topics and identified Key Performance Indicators (KPIs) to progress year over year. Alignment with international sustainability frameworks support transparency and comparability of effectiveness results. The table below provides a summary of human rights and modern slavery-related indicators disclosed in alignment with GRI standards. In parallel, Solenis also tracks performance indicators aligned with Responsible Care®, a global chemical industry framework that promotes safe chemicals management, product stewardship, and transparent engagement.

Framework Reference	Indicator Description	FY25 KPI Results
<b>GRI Standards</b>		
<b>GRI 2-25/2-26</b>	Processes to remediate negative impacts; Mechanisms for seeking advice and raising concerns	See Page 79 of our Annual Sustainability Report
<b>GRI 3-3</b>	Management of material topics	See Page 49 of our Annual Sustainability Report
<b>GRI 405-1/2</b>	Diversity of governance bodies and employees; Ratio of basic salary and remuneration of women to men	See Pages 111 and 66 of our Annual Sustainability Report
<b>GRI 406-1</b>	Incidents of discrimination and corrective actions taken	Not published externally
<b>GRI 407-1</b>	Operations and suppliers in which the right to freedom of associate and collective bargaining may be at risk	See Page 67 of our Annual Sustainability Report
<b>GRI 408-1/409-1</b>	Child labor / forced or compulsory labor, where material.	See Page 78 of our Annual Sustainability Report
<b>GRI 410-1</b>	Security personnel trained in human rights policies or procedures	Not published externally
<b>GRI 411-1</b>	Incidents of violations involving rights if indigenous peoples	Not published externally
<b>GRI 413-1</b>	Operations with local community engagement, impact assessments, and development programs	See Page 69 of our Annual Sustainability Report
<b>GRI 413-2</b>	Operations with significant actual and potential negative impacts on local communities	Nothing material to report
<b>GRI 414-1</b>	New suppliers screened using social criteria	See Page 25 of our Annual Sustainability Report
<b>GRI 414-2</b>	Negative social impacts in the supply chain	See Page 24 of our Annual Sustainability Report