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## **SOLENIS POLICY**

### **Responsible Chemistry**

#### **1.0 Policy**

Solenis has a long tradition of product stewardship and a commitment to safe and sustainable operations that balance the needs of society, environmental responsibility and financial performance. Minimizing safety risks to our employees, customers and the communities where we operate is a core part of our commitment to sustainability. Solenis' customers are increasingly targeting and avoiding chemicals of concern as part of their sustainability goals. Proactive sustainable chemical management and identifying components with health or environmental concerns offer strategic advantages by anticipating regulatory rules, meeting customer specifications, and positioning Solenis as a leader in greener chemistry.

#### **1.1 Objective**

To meet these requirements, Solenis maintains a Substances of Concern List (SCL) to identify and categorize substances with intrinsic adverse environmental and toxicological properties. The SCL sets prohibitions or restrictions on chemical products, raw materials and single-use packaging with environmental, health, safety or regulatory concerns.

#### **1.2 Applicability**

The SCL applies to all chemical products sold, licensed or distributed by all business units of Solenis as well as to all raw materials, ingredients, single-use packaging components or byproducts used in Solenis' products.

#### **2.0 Product stewardship**

We work to be an industry leader and are committed to operating our global facilities and businesses in accordance with the principles of [Responsible Care](#)<sup>\*</sup>. Solenis' commitments to the environment, Responsible Care, health, safety and security are outlined in our [Responsible Care policy, SL-POL-005.000](#). 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 friendly manner. We provide product safety information throughout the value chain to enable our customers and end-users to understand and manage risk and to provide meaningful and relevant information to their respective stakeholders.

### 3.0 Substance of concern categories

The SCL consists of four tiers.

**Banned List:** Substances of the highest concern are in the Banned List because of their high toxicity to humans or the environment often with a tendency to accumulate. These substances shall not be put on the market.

**Phase Out List:** Substances with newly obtained data that meet banned list criteria and are not used in new developments. Solenis is actively working to eliminate these substances from its portfolio as quickly as feasible. When the phase-out work is completed, these substances would move to the Banned List.

**Risk Management List:** Substances with known human or environmental hazards for which the risks can be managed in product design or application.

**Watch List:** Substances where hazards are becoming known, and developments are being monitored for further action.

### 4.0 Process

The Solenis Product Regulatory team monitors regulatory developments and has the scientific knowledge to identify substances that would trigger inclusion into one of the four tiers of Categorization.

The SCL is reviewed at least twice per year and any substance added to the Candidate List of substances of very high concern for Authorisation (SVHC) of European Chemicals Agency and SIN (Substitute It Now) List of ChemSec (The International Chemical Secretariat) are directly added to the list. Solenis may also add substances that are not part of these lists to the SCL as a proactive measure to invest in safer chemistries and help ensure our products remain ahead of future regulatory restrictions.

For identified substances, a risk mitigation strategy is identified. In a quarterly meeting the substances are classified by the Substances of Concern Committee which consists of global representatives of Product Regulatory, Product Management, Global Technology, Strategy and Sustainability. For Phase Out List substances, the committee develops a plan to eliminate these in a timely manner and follow up regularly.

Any newly acquired company is evaluated to determine if their portfolio contains substances that appears on the Banned List or Phase Out List. A plan is developed on how to remove substances in a timely manner to comply with Solenis requirements.

Exceptions to this process must be reviewed as part of the Substances of Concern Committee meeting. All exceptions must be escalated and receive approval from the Substances of Concern Committee Governance Board which includes the Chief Sustainability Officer, Chief Technology Officer and General Counsel.

## 5.0 Use and maintenance of this policy

This policy is communicated to all employees and made available at all Solenis sites. The Product Regulatory Team will update the SCL at least twice per year. Updates will be made to ensure the policy reflects best practices in substance management. Any violation of this policy should be reported to management through our Share Your Concern channels or via email to [ethicsandcompliance@solenis.com](mailto:ethicsandcompliance@solenis.com).

[Global Standards of Business Conduct SL-POL-004.000](#)

## 6.0 Connected policies

**Safety:** The health and well-being of Solenis employees is vitally important. This policy is linked to our employee safety policy and shows our ongoing commitment to continually monitoring and improving safety standards. [Responsible Care Policy SL-POL-005.000](#).

**Procurement:** The Substances of Concern Policy will be communicated to all Solenis suppliers and is a part of the Responsible Sourcing and Supplier Code of Conduct policies to ensure suppliers report on any raw materials that may contain potential hazards. [Supplier Code of Conduct SL-POL-008.007](#), [Sustainable Procurement of Raw Materials SL-POL-008.005](#)

## 7.0 Scope

Compliance with this policy is the responsibility of every employee worldwide and is a condition of employment. Managers will lead by example as well as educate and train workers and stakeholders.

## 8.0 Owner

Vice President, Global Fast Track R&D and Product Regulatory.

## 9.0 Exceptions

Exceptions to this policy must be reviewed as part of the Substances of Concern Committee meeting. All exceptions must be escalated and receive approval from the Restricted Substance Committee Governance Board which includes the Chief Sustainability Officer, Chief Technology Officer and General Counsel.