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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

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

## 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
Health & Safety of Employees	<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>
Working Conditions	<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>
Illegal Forms of Labor	<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>
Discrimination	<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>
Freedom of Association & Collective Bargaining	<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.