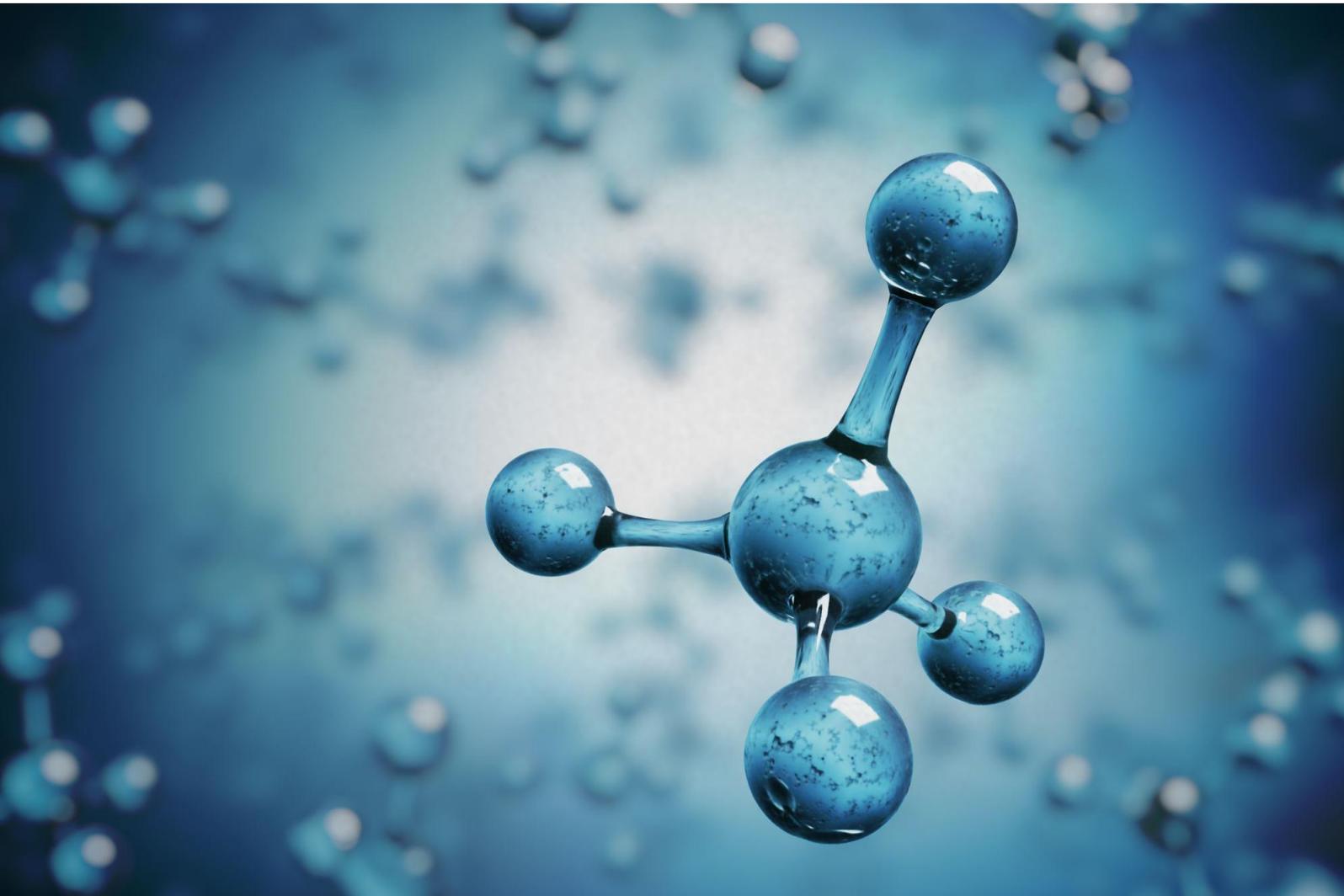


Modern Slavery *Statement*

Provided under the *Modern Slavery Act 2018* (Cth)



April 2025



1. THIS STATEMENT

This Statement is made in accordance with the Australian *Modern Slavery Act 2018* (Cth) (“the Act”) for the period 1 October 2023 to 30 September 2024 (FY24) (“the reporting period”). This joint Statement is made under Section 14 of the Act by Solenis Holding Limited (“Solenis”) as the “submitting entity”, on behalf of the reporting entities (collectively “we”, “us”, “the reporting entities”) under the Act for the reporting period.

In line with the Act, this Statement describes the steps taken by the reporting entities and their owned and controlled entities to assess and address modern slavery risks.

This Statement 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.

On 4 November 2024 Solenis acquired BASF’s flocculants assets for mining applications. We note that BASF Australia is a reporting entity for the purposes of the Act and submitted a statement for FY23. Solenis has not included the BASF acquisition as part of this statement as the acquisition precedes the reporting year in question.

2. OUR STRUCTURE, SUPPLY CHAIN AND OPERATIONS

2.1 OUR STRUCTURE

Solenis is headquartered at 2475 Pinnacle Drive, Wilmington, Delaware 19803, United States, and is privately owned by Platinum Equity Advisors LLC (“Platinum”), at 360 N. Crescent Drive, Beverly Hills, California 90210, United States. The registered address of Solenis Holding Limited, the submitting entity, is 280 Bishopsgate, London, United Kingdom, EC2M 4AG.

Solenis has three entities with operations in Australia whose activities are covered by this statement:

- Solenis Australia Pty Ltd, (ACN 169 325 151), registered at 1612-1624 Centre Road, Springvale, VIC 3171 Australia. – a wholly owned subsidiary of Solenis Holding Limited operating in Australia
- Innovative Water Care International Pty Ltd, (ACN 074 240 707) c/o Baker & McKenzie, Tower One - International Towers Sydney, Level 46, 100 Barangaroo Avenue, Sydney, NSW, 2000, Australia – a wholly owned subsidiary of Solenis Holding Limited operating in Australia
- Diversey Australia Pty. Limited, (ACN 080 527 117), Unit 8, 55-57 Newton Road, Wetherill Park NSW 2164 Australia– a wholly owned subsidiary of Solenis Holding Limited operating in Australia

2.2 OUR OPERATIONS

Solenis is a leading global producer of specialty chemicals focused on delivering sustainable solutions for water-intensive industries, including consumer, industrial, institutional, food and beverage, pulp and paper and pool and spa water markets.

The company’s product portfolio includes a broad 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.

The company has 70 manufacturing facilities strategically located around the globe and employs a team of over 16,500 professionals and our operations and products span approximately 160 countries. Solenis is a 2024 Best Managed Company Gold Standard honoree.

For additional information about Solenis, please visit [our website](#).

2.2.1 AUSTRALIAN OPERATIONS

The following table sets out operations in Australia of wholly owned subsidiaries of Solenis:

Company	Operational activities
Solenis Australia Pty Ltd	<p>Provides solutions for various industries, including pulp and paper, oil and gas, chemical processing, mining, biorefining, power, and municipal markets.</p> <p>Operations consist of 2 sites, 102 employees (Springvale site 19 employees, Kwinana site 27 employees) and 1 contract manufacturing for 249 customers</p>
Innovative Water Care International Pty Ltd	<p>Specializes in water treatment solutions, providing a range of products and services aimed at maintaining and improving water quality for various applications, including swimming pools, spas, and industrial water system.</p> <p>Operations consist of 0 site, 0 employee and 0 contract manufacturing for 0 customer, liquidation completed in Sep 2024</p>
Diversey Australia Pty. Limited	<p>Focuses on cleaning and hygiene solutions, providing products and services for sectors such as healthcare, hospitality, food and beverage, and facility management, including cleaning chemicals, equipment, and services.</p> <p>Operations consist of 1 site, 129 employees (within Springvale site 37 employees) and 4 contract manufacturing for 2507 customers</p>

2.3 SUPPLY CHAIN

During the reporting period, Solenis interacted with over 20,000 suppliers globally. We typically have long-term relationships with our suppliers and have worked with many of them for several years.

The reporting entities follow global procurement processes and utilize Solenis global procurement functions to source critical raw material inputs. The majority of the reporting entities' suppliers (approximately 60%) are located in Australia, followed by China, India, Japan, and Germany. We also undertake our own sourcing for raw material inputs and other business requirements.

Products and services procured globally in the reporting period included:

- Direct Materials, such as chemicals & packaging, bottles, cardboard, plastic packaging, and pallets
- General Expenses, such as professional services, customer equipment, and office supplies
- Logistics, such as freight, logistics services, and warehousing
- Technical Goods, such as laboratory equipment & supplies, and plant equipment
- Technical Services, such as construction & maintenance, industrial cleaning, health & safety services, and waste management
- Information Technology, such as hardware, software, and services
- Packaging, such as bottles, cardboard, plastic packaging, as pallets
- Energy & Utilities, such as electric, natural gas, and water & sewer

3. RISKS OF MODERN SLAVERY

3.1 DEFINING MODERN SLAVERY RISK

Our approach to defining and assessing risk is in alignment with the United Nations Guiding Principles on Business and Human Rights (UNGPs). We define “modern slavery risk”, in line with the UNGPs, the Act, and its official guidance as *the potential for Solenis to cause, contribute to, or be directly linked to modern slavery through its operations and supply chains*. We acknowledge that risk in this context refers to “risk to people” of experiencing conditions of modern slavery.

3.2 OPERATIONS RISKS

The reporting entities have not undertaken an assessment of our operational risks in Australia. However, based on inherent risk factors, we understand risks to be related to the potential for labour exploitation in:

- Our manufacturing sites
- Procured services at our facilities such as cleaning and security
- Labour hires

3.3 SUPPLY CHAIN RISKS

3.3.1 GLOBAL RISK PROFILE

Solenis undertook a scan of our supplier data in 2023 that considered potential risks of modern slavery, including geographic and industry/commodity risk considerations.

At a global procurement level, geographic information is collected based on the location of the supplier, which may be either the manufacturers of products and/or the distributors of products manufactured elsewhere. Solenis’ global strategic chemical suppliers are mainly located in Germany, France, the United States of America, the United Kingdom, and Brazil.

The 2023 assessment identified the following inherent risk factors:

Risk area	Sources	Risk factors
<p>Geographic risk: refers to the inherent risk of modern slavery in the country where goods are made or sourced from.</p>	<p>A range of sources considered included:</p> <ul style="list-style-type: none"> • Child labour risk: UNICEF • Walk Free’s Global Slavery index • Poverty rates: World Bank • Human trafficking risk: US Department of State 	<p>High risk countries include Belarus, Brazil, China, Colombia, Dominican Republic, Egypt, El Salvador, Guatemala, India, Indonesia, Jamaica, Malaysia, Mexico, Pakistan, Peru, Russia, Saudi Arabia, Serbia, South Africa, Thailand, Trinidad and Tobago, Tunisia, Turkey, United Arab Emirates, and Vietnam. Countries considered very high risk are Zimbabwe and Eritrea.</p> <p>Medium risk countries include Argentina, Bulgaria, Georgia, Ghana, Greece, Hong Kong, Hungary, Israel, Namibia, Panama, Poland, Romania, and Ukraine.</p> <p>Low risk countries include Australia, Belgium, Canada, Chile, Costa Rica, Cyprus, Czech Republic, Estonia, France, Ireland, Italy, Japan, Liechtenstein, New Zealand, Portugal, Singapore, Slovakia, Slovenia, South Korea, Spain, the United Kingdom, and the United States.</p>
Risk area	Identified high-risk category	Risk factors
<p>Category risk: refers to a procurement category and the risks to people for modern slavery-like conditions within the sector, industry, or products of that category.</p>	<p>Chemicals</p> <p>Manufacturing</p> <p>Construction</p> <p>Hospitality</p>	<p>The key <u>human rights related risks</u> in the chemical industry include occupational health and safety risks, potential exposure to poor working conditions or hazardous materials, and negative impacts on vulnerable groups such as through the exploitation of local raw materials and water sources. (GSI, WRO, Specialty Chemicals, OECD).</p> <p>Manufacturing, including contract manufacturing, carries a high risk of modern slavery, mostly in the production of materials in lower tiers of domestic or global supply chains and the extraction of raw materials. The manufacturing industry includes a range of skilled and low-skilled positions; low-skilled labour has an <u>increased risk of human trafficking</u> as many workers lack other employment options. These workers also lack leverage to negotiate for higher wages, safer working conditions, and reasonable working hours, and are vulnerable to significant job insecurity. There are also <u>high risks</u> of child labour in the manufacturing industry.</p> <p>The construction industry has widespread use of contractors and subcontractors, who often rely on the use of <u>vulnerable workers</u>, such as migrant workers, day-labourers, or temporary workers. These workers are more susceptible to trafficking and discrimination, excessive recruitment fees, and withholding of documents. The International Labour Organization estimates that approximately 16% of forced labour exploitation cases worldwide occur in the construction industry, and it is one of the most hazardous sectors for workers. Another key risk in the industry is related to <u>health and safety</u>; the major health and safety risks include fatal and non-fatal incidents, spreading of communicable diseases, and working excessively long hours.</p> <p>The hospitality industry includes facilities maintenance, cleaning, travel & entertainment services, and security</p>

	<p>services. The key human rights related risks include low wages and long hours, adverse environmental impacts, and <u>higher risks</u> of forced or child labour, as these services often rely on recruiting through contractors and subcontractors, and often employ vulnerable workers such as migrant or temporary workers.</p>
Logistics	<p>The logistics industry includes shipping, transportation, and warehousing services, and carries potential risks of modern slavery. <u>Ocean freight</u> in particular can have <u>high risks</u> of forced labour as workers may be deprived of their rights to annual or shore leave and repatriation, and may be forced to continue working beyond the terms in their employment contracts. Similarly, warehousing services are increasingly outsourced to third-party logistics companies and often rely on temporary or subcontracted labour, which comes with <u>higher risks</u> of exploitation or hazardous work conditions.</p>
Packaging	<p>The packaging industry has potential risks of forced and child labour in its upstream pulp and paper supply chains. The forestry and logging industry has been linked to <u>violations of Indigenous peoples' rights</u>, and in the US, forestry is one of several industries that uses incarcerated labour, with <u>documented cases</u> of unfair treatment and unsafe working conditions. Similarly, the plastic packaging and petroleum product industry can often include temporary workers who may be at <u>risk of forced labour</u>, excessive working hours, withheld wages, restricted freedom of movement, and unsafe or unhealthy working conditions.</p>
Waste management	<p>The waste management industry has <u>high risks</u> of insufficient labour standards, negative community impacts, and poor workplace health and safety. There is also a risk of forced labour, as the industry often relies on temporary workers or migrant workers recruited by sub-contractors who are more vulnerable to exploitation and abuse, including human trafficking.</p>

3.3.2 AUSTRALIAN RISK PROFILE

We believe our risk profile in Australian operations to be substantively similar to our global risk profile. In the preparation of this Statement, we undertook a limited additional analysis of the supply chain data of the three Australian entities. This included a review of procurement data to identify the risk levels of procurement spend based on geographic risk and category risk. The analysis drew from reputable data sources, such as the Global Slavery Index (GSI), Global Rights Index (GRI), Trafficking in Persons Report, List of Goods Produced by Child Labour or Forced Labour, Withhold Release Orders list (WRO), and commodity research by Verité. The risks described here are the potential or inherent risks based on the modern slavery risk profile of that country, sector, or industry. They are general in nature and do not represent specific issues or practices found in our products and services procurement.

Approximately 20% of procurement spend by the reporting entities was with high or very high-risk countries: China, India, Indonesia, Mexico, Thailand, Egypt, Turkey, and Malaysia. The

most high-risk commodities within this sample were certain chemicals, machinery and other equipment, packaging materials, and contract manufacturing, including of chemicals.

Where country and commodity risks combine, we identified the following areas of inherent risk:

- Chemicals from China and India
- Machinery and other equipment from China, India, Thailand, and Malaysia
- Packaging materials from China, Thailand, and Malaysia
- Contract manufacturing of chemicals in China and Turkey

Other high-risk commodities were identified, but linked to suppliers in lower-risk countries, including Australia, Belgium, Canada, Switzerland, Germany, Denmark, France, the United Kingdom, Italy, Japan, the Netherlands, New Zealand, Romania, and Singapore. These categories included chemicals, contract manufacturing (chemicals), packaging materials, and machinery and other equipment (including electrical equipment). Although the final distributor of these products may be based in Australia or other lower-risk countries, the inputs and manufacturing process of the products could have increased risks of modern slavery in other countries.

4. ACTIONS TAKEN TO ASSESS AND ADDRESS THESE RISKS

At a global level, Solenis has integrated responsible business conduct into our policies and management systems to promote respect for fundamental human rights and decent working conditions in connection with the production of goods and provision of services. Key global actions, policies and governance mechanisms are outlined the table below.

These policies and practices apply to the Australian reporting entities.

Action	Description
Governance	<ul style="list-style-type: none"> • At a global level, Solenis has two dedicated senior-level positions responsible for the governance of human rights and labour practices. Human rights are overseen by our General Counsel, and labour practices are overseen by our Chief Human Rights Officer. • A Sustainability Task Force drives efforts to effectively manage material issues across the global organization and supply chains, including human rights and labour practices. This is led by the Chief Sustainability Officer, and includes cross-functional workstreams to drive improvement in areas including governance, compliance, laws and regulations, and due diligence.
Policies	<ul style="list-style-type: none"> • <u>Human Rights Policy</u>: Applies to all employees and third parties of Solenis globally, and prohibits all forms of forced labour in compliance with relevant laws and alignment with internationally recognized standards. • <u>Child and Forced Labour and Human Trafficking Policy</u>: Prohibits the use of child or forced labour and sets out expectations for suppliers and contractors to comply. • <u>Conflict Minerals Policy</u>: Commitment to ensure that raw materials or other goods comply with US and EU regulations. • <u>Procurement Sourcing Policy</u>: Raw material suppliers are annually assessed on factors including human rights risk factors.

	<ul style="list-style-type: none"> • <u>Supplier Code of Conduct</u>: Provides minimum standards for all suppliers globally and establishes expectations for human rights.
<p>Procurement & management of supply chain risk</p>	<ul style="list-style-type: none"> • <u>Supplier Risk Management Program</u>: Framework for identifying, assessing, and mitigating risks, including individual programs for direct raw material suppliers, indirect suppliers, and on-site contractors. • <u>Pre-qualification risk assessment</u>: Suppliers must be screened for risks in human rights, labour conditions, and legal compliance including document verification. Suppliers must agree to the Supplier Code of Conduct or alternate criteria (e.g., UN Global Compact). Suppliers are reviewed annually. • <u>Raw materials</u>: In line with Solenis’ policy, raw material suppliers must maintain an EcoVadis Bronze-level assessment or higher. Non-compliant suppliers must implement corrective actions with evidence of improvements. • <u>Supplier Relationship Management</u>: Solenis maintains supplier performance scorecards for direct material suppliers to identify areas for improvement. • <u>Capacity building</u>: Where prospective or renewing suppliers do not meet Solenis’ standards, we provide education and support them to create action plans. • <u>Engagement</u>: Solenis proactively engages with our suppliers and partners to increase awareness and foster compliance, including regular meetings and feedback channels.
<p>Grievance and Remediation</p>	<ul style="list-style-type: none"> • <u>Grievance Mechanism</u>: Our 24-hour anonymous and confidential reporting platform, Share Your Concern, is accessible to all employees, business partners, 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 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. • <u>Investigations Policy</u>: Our Investigations Policy outlines 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 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.

5. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

Solenis has set clear and defined sustainability targets and performance indicators to measure progress globally. Solenis annually tracks and measures supplier engagement through the Supplier Risk Management Program.

Solenis discloses performance data concerning governance, risk management, due diligence, and compliance initiatives pertaining to human rights and decent working conditions in our externally assured Annual Sustainability Report, which includes a dedicated Environmental, Social and Governance (ESG) Data Table and Global Reporting Initiative Content Index.

Priority sustainability topics have been mapped, and Key Performance Indicators identified to measure global progress against these goals.

6. CONSULTATION

Limited consultation with the reporting entities took place during this reporting period to develop and approve this statement. We acknowledge this as an opportunity for improvement in future.

7. PRINCIPAL GOVERNING BODY APPROVAL

This statement was approved by the board of Solenis Holding Limited in their capacity as principal governing body of Solenis Australia on 10th of April 2025.

This statement is signed by Alma Charlotta Kanto Öqvist in their role as the Chief Sustainability Officer of Solenis Holding Limited on 10th of April 2025.

DocuSigned by:
Alma Charlotta Kanto Öqvist
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Alma Charlotta Kanto Öqvist

Chief Sustainability Officer

10th of April 2025

8. APPENDIX TABLE OF MANDATORY CRITERIA

Criteria	Description	Requirement	In this Statement
1	Identify the reporting entity	Entity is required to identify the reporting entity that is covered by the statement - this includes Entity owned and operated subsidiaries.	Section 2, page 2
2	Structure, operations and supply chain	Entity is required to describe the structure, operations and supply chains of the reporting entity. During this process, the entity should specifically describe what components of their activities and relationships are categorized under own operations and supply chains.	Section 2, page 2
3	Risk of modern slavery in your operations	Entity is required to describe the risks of modern slavery in its activities. The entity is only required to identify how risks of modern slavery may be present in the entity's own operation; it is not required to report on actual cases of modern slavery.	Section 3, page 4
	Risk of modern slavery in your supply chain	Entity must report on the risks of modern slavery in the products and services that contribute to the entity's own products and services sourced in Australia or overseas. This extends beyond direct suppliers.	Section 3, page 4
4	Actions taken to address risks	Actions taken to assess and address the identified risks including due diligence and remediation activities, policies, training, reviews, grievance mechanisms etc.	Section 4, page 7
5	Assessing effectiveness	As reporting years progress it is expected each annual statement will address how actions taken are being measured for effectiveness in remedying findings or causes of modern slavery.	Section 5, page 8
6	Consultation	The internal consultation process in preparing the Statement must be described including chain of responsibility.	Section 6, page 9
	Principal governing body approval	In the form prescribed by the Act	Section 7, page 9