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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 activities, and expects its employees and third parties across our value chain to conduct 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 increase awareness of the human rights that may be relevant to Solenis' business and reaffirm the company's commitment to upholding human rights across all global operations, without exception.

2.0 Human rights

Solenis conducts its business in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labor, environment and anti-corruption. Solenis follows the norms and principles 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](#).

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](#)^{*} 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' position with respect to human rights conforms with the ILO conventions for minimum age and child labor. Solenis complies with all local laws and regulations related to hiring children (any person under the age of 15) and does not employ children or support the use of child labor. Solenis does not employ young persons (under the age of 18) at night or in hazardous conditions. The company also encourages the creation of educational, training or apprenticeship programs tied to education of young people.

2.6 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 in accordance with 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

^{*} Trademark owned by a third party



committed to establishing a constructive dialogue with their freely chosen representatives and bargain in good faith.

2.7 Data privacy

We are committed to protecting the personal information of all individuals and to leverage data as an enterprise asset and mitigate 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](#) policy, unless such policies conflict with stricter requirements of local laws.

3.0 Implementation

Solenis, as a global company, recognizes that protecting and upholding human rights presents unique challenges in different parts of the world. Solenis intends to drive toward the implementation of its human rights commitments by the company's suppliers for their own operations and those of their suppliers in turn.

Solenis promotes human rights awareness and respect along the value chain. The measures are detailed in Solenis' [Supplier Code of Conduct](#) and include:

- Contract commitments and enforcement with existing suppliers to ensure compliance with the principles contained within this policy and the Supplier Code of Conduct;
- Implementation of the supplier due diligence and certification process to identify and monitor human rights-related risks before and after suppliers are onboarded.

4.0 Reporting

Any instances of non-compliance with the policy should be reported in accordance with Solenis' [Reporting](#) policy. Concerns will be shared with direct or indirect managers or with the Office of Ethics and Compliance: ethicsandcompliance@solenis.com.

Anonymous reports can be submitted via "Share Your Concern" page on the Solenis intranet.

5.0 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 conflict of interest or cooperating in a compliance-related inquiry.

6.0 Scope

This applies to all Solenis employees.



7.0 Owner

Senior Vice President and General Counsel.

8.0 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