Statement on Modern Slavery and Human Trafficking

The BASF Group ("BASF") is committed to the abolition of forced labour, slavery and human trafficking. This statement sets out the steps the BASF Group has taken during the financial year 2024 to seek to ensure that slavery and human trafficking is not taking place in any of its supply chains and in any part of its own business.

1. BASF's organisational structure, business and supply chains

BASF has companies in more than 91 countries and supplies products to numerous customers in nearly every part of the world. BASF's portfolio is arranged into six segments: Chemicals, Materials, Industrial Solutions, Surface Technologies, Nutrition & Care, Agricultural Solutions. BASF had sales of about €65,3 billion in 2024 and employed approximately 112,000 employees as of the end of the year.

As the world's leading chemical company, BASF combines economic success with environmental protection and social responsibility. This is reflected by BASF's corporate purpose "We create chemistry for a sustainable future". We live our corporate purpose by:

- Sourcing and producing responsibly
- Acting as a fair and reliable partner
- Connecting creative minds to find the best solutions for market needs

2. BASF policies in relation to slavery and human trafficking

BASF acts in accordance with clearly defined values and standards of conduct that comply with or go beyond laws and regulations and take internationally recognised principles into account. BASF commits to internationally agreed-upon standards:

- The ten principles of the UN Global Compact
- The UN Universal Declaration of Human Rights and the two UN human rights covenants
- The ILO's core labour standards and its Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy (MNE Declaration)
- The OECD Guidelines for Multinational Enterprises
- The UN Guiding Principles on Business and Human Rights

BASF is firmly against any form of forced labour, slavery, and human trafficking. BASF will not condone or tolerate any type of such conduct by its employees, suppliers, vendors, or other stakeholders.

[1] This statement is made in accordance with Section 54 of the UK Modern Slavery Act of 2015 and other applicable laws.

As set out in BASF's Global Code of Conduct, BASF made the decision to pursue sustainable value creation, which means striving to positively contribute to the protection and promotion of human rights and people's well-being. BASF strictly aims to avoid causing or contributing to adverse human rights impacts in its own operations and when working with third parties such as employment agencies providing agency workers engaged at BASF and when working with freelancers. Moreover, BASF seeks to ensure that the conduct of all its employees and third-party workers is consistent with internationally agreed upon standards of human rights as well as international labour and social standards (ILSS).

As a participant in global value chains, BASF is dependent on partners and demand that they likewise respect human rights and the associated ILSS. BASF requires that its suppliers, contractors and vendors comply with all applicable laws, including those relating to labour practices and forced labour. Accordingly, BASF's Supplier Code of Conduct reflects the expectation that suppliers fight forced labour. Embedded in BASF's Supplier Code of Conduct is the Commitment Letter on ILSS[2], which reflects BASF's expectations of third parties to commit to respecting ILSS, including no forced labour. If BASF becomes aware of credible information about any form of forced labour, human trafficking or slavery by its suppliers or vendors, it will conduct a thorough investigation and, if appropriate, take corrective measures.

3. BASF's due diligence processes in relation to slavery and human trafficking

3.1 BASF's own operations

3.1.1 Management process

BASF's Group-wide guidelines on the respect of ILSS for BASF employees and for agency workers and freelancers engaged at BASF are derived from the UN Guiding Principles on Business and Human Rights (UNGPs). As a founding member of the UN Global Compact, BASF is inspired by and supports the UNGPs and respective national equivalents. Based on the BASF ILSS guidelines, BASF systematically assesses actual or potential gaps with respect to local laws and political or cultural background in all countries in which BASF operates. BASF's ILSS guidelines include the prohibition of forced labour.

BASF evaluates its adherence to its voluntary commitments using the monitoring system implemented Group-wide, comprising the Global Compliance Hotline for BASF employees and third parties worldwide, the survey of its group companies according to a risk-based approach to inspect the prevailing working conditions on a regular basis and close dialogue with the stakeholders, such as employee representatives and international organisations.

In countries in which national laws, rules and customs deviate from international standards, BASF is challenged with finding appropriate solutions by engaging with the relevant stakeholders. If national law contains no or lower requirements, action plans will be drawn to close these gaps in a reasonable time frame. If any conflicts arise with national law, rules or national customs, BASF strives to act in accordance with the BASF values and internationally recognised principles without violating the law of the respective country.

An additional component of our corporate due diligence is our training concept, which includes target group-specific trainings, e-learning modules and a global platform for internal dialogue. Individual elements of BASF's Group-wide guideline on the respect of ILSS are also reviewed as part of internal control processes such as Responsible Care audits at BASF Group companies. In addition to these quality assurance measures, compliance with ILSS is an integral part of the standard questionnaire in the compliance management audits conducted by the Corporate Audit department.

3.1.2 Global Compliance hotlines

BASF has also set up a Global Compliance Hotline, which is provided by an external provider, offering the possibility to report concerns via online form or phone in over 80 countries. Employees can turn to the

---

2 The Commitment Letter is addressed to BASF's third parties such as temporary employment agencies providing agency workers to BASF, as well as to freelancers contracting with BASF. More information is available at: https://www.basf.com/global/en/who-we-are/organisation/suppliers-and-partners/sustainability-in-procurement.html

Compliance Hotline anonymously. The Compliance Hotline can also be used by third parties such as business partners or other stakeholders to raise concerns. BASF ensures that all concerns are processed and answered in a swift manner.

3.2 BASF's supply chains

Both new and existing suppliers are selected and evaluated beyond economic criteria. BASF looks closely at environmental protection, compliance with human rights, labour and social standards and anti-corruption policies. BASF's requirements are defined in the Supplier Code of Conduct.

BASF is a founding member of the Together for Sustainability (TfS) initiative of leading chemical companies for the global standardisation of supplier evaluations and auditing. With the help of TfS, BASF advances sustainability in the supply chain. Using TfS evaluations, BASF pursues a risk-oriented approach with clearly defined, company-specific follow-up processes. Suppliers with an elevated sustainability risk – such as slavery or human trafficking - are identified using risk matrices. Furthermore, BASF's procurement staff indicate the suppliers for whom they see a potentially elevated sustainability risk. BASF additionally checks various information sources to see if any suppliers have been mentioned in connection with negative sustainability incidents.

If suppliers have any concerns about illegal or improper conduct, they can use the BASF Compliance Hotline.

Conclusion

BASF Metals Ltd. Board of Directors and the corporate and functional units supporting it will work together to further the commitment to fight forced labour, slavery and human trafficking. This partnership will help ensure that human rights are being respected in BASF's workforce and supply chain.

We will continuously work to further develop and strengthen our efforts to respect and promote all proclaimed human rights including the right not to be subjected to forced labour, slavery or human trafficking.

This statement was approved by the Board of Directors of BASF Metals Ltd on 03/02/2026.



Adam Wilce

Director BASF Metals Recycling Ltd.