

# Solenis 2025 Human Rights and Modern Slavery Due Diligence Report

## EXECUTIVE SUMMARY & KEY ACHIEVEMENTS

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Solenis is committed to ensuring and respecting human rights, including decent working conditions and combatting modern slavery, forced labour and child labour risks across our operations and supply chains. This report sets out Solenis commitments, policies and actions regarding human rights and modern slavery for 2025. During the reporting year, we made key progress to mature our approach to human rights:

- Solenis constructed a corporate-level **Human Rights Management Plan** that integrates existing policies, practices, and governance, and defines roles and responsibilities for the identification, management, and oversight of human rights issues
- We established a **cross-functional human rights working group** with responsibility for reviewing relevant policies and practices for alignment with international standards and best practices
- We built the **capacity of our employees** by developing and disseminating materials on human rights and modern slavery
- A range of key supply chain policies were updated, including the **Supplier Code of Conduct**, our **Global Procurement & Responsible Sourcing Policy** and our **Supplier Risk Assessment Protocol**.
- We undertook a human rights gap assessment to identify priority areas for improvement and to strengthen alignment with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- We developed a corporate-level **Human Rights Remedy Framework** that provides a structured and consistent approach for responding to, investigating, remediating and learning from concerns

These actions have strengthened foundations and established a systematic and outcomes-focused approach to human rights due diligence across Solenis' operations and supply chains. Additional policies, procedures, due diligence practices, certifications, and remediation mechanisms relating to human rights in our operations and supply chain are published in the **Sustainability and Regulatory Library** on our website.

Any person has the right to obtain information from Solenis regarding this report and how our approach to human rights and modern slavery due diligence:

- The **“Contact Us” page** on our website provides a direct communication pathway or questions and concerns can be shared via phone: United States and Canada: +1 833 203 3981 For other countries, click **here** for the access code and phone numbers.

Alternately, our confidential and anonymous online portal can be accessed **here**.

## 1. INTRODUCTION

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This Human Rights and Modern Slavery Due Diligence joint report “this report” has been prepared and submitted by Solenis Holding Limited (“Solenis” – United Kingdom, Company Number 14910669) and the entities that it controls, in accordance with the following requirements (“the Acts”):

- **Australia:** *Modern Slavery Act (Commonwealth) 2018, constituting a “Modern Slavery Statement” and a “joint statement” for the purposes of that Act*
- **Canada:** *Fighting Against Forced Labour and Child Labour in Supply Chains Act*
- **Norway:** *Norwegian Transparency Act (Åpenhetsloven)*
- **UK:** *Modern Slavery Act 2015*

Solenis Holding Limited is registered at 280 Bishopsgate, London, United Kingdom, EC2M 4AG, and is privately owned by Platinum Equity Advisors LLC (“Platinum”), headquartered at 360 N. Crescent Drive, Beverly Hills, California 90210, United States.

This report covers the reporting year October 1, 2024, to September 30, 2025 (“the reporting period”). This is a joint report made pursuant to the Acts by Solenis (Solenis Holding Limited (“Solenis” – United Kingdom, Company Number 14910669) on behalf of the entities listed in the Reporting Entities Appendix of this report “the reporting entities”. It outlines the steps and measures we have taken to prevent and reduce the risks of human rights risks, child labour, forced labour, modern slavery and human trafficking in our operations and supply chains. Any references to “we”, “Solenis”, “the Company”, “us”, “our” or description of risks, actions or relevant information are made with regard to all reporting entities, including those acquired through acquisition during the reporting period, unless otherwise stated. While the relevant Acts apply to specific jurisdictions, we report globally for completeness and continuity with prior reporting.

This report 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.

Solenis acquired NCH Corporation (NCH) in November 2025. Full integration into Solenis’ reporting processes is expected in future reporting years.

### 1.1 CONSULTATION AND REPORT DEVELOPMENT

This Report was developed through a multistep process, informed by:

- Review of legislative requirements across Australia, Canada, Norway, the United Kingdom, and the optional International Reporting on Modern Slavery, Forced Labour and Child Labour Template.
- Review of Solenis’ available policies, management systems standards, procedures, supplier management tools and contracts, training resources, and records, along with grievance and reporting mechanism records.
- Input and review from relevant Solenis’ Human Rights Working group, subject matter experts, and senior leadership who provided context and confirmation of FY25 activities, ongoing challenges, and priorities for FY26.
- Independent analysis, review and support from an independent third party.

Solenis consulted with reporting entities in the development of the report as follows:

- Solenis, LLC consulted with all reporting entities it owns or controls through engagement with local legal and functional teams, who provided input on operations, practices, and FY25 activities relevant to modern slavery and human rights risks.

- Relevant corporate functions, including Legal, Human Resources, Procurement, Sustainability, and EH&S, contributed to and reviewed the content of this Report. The Solenis Human Rights Working Group and subject-matter experts provided oversight and validation.
- Senior leadership and the appropriate governing body of Solenis, LLC reviewed and approved this Report prior to publication. See Appendix for consultation, approval and attestation detail.

## 2. OUR STRUCTURE, OPERATIONS, ACTIVITIES, AND SUPPLY CHAINS

### 2.1 OUR STRUCTURE, OPERATIONS & ACTIVITIES

Solenis is a leading global provider of water and hygiene solutions committed to building a safer and healthier world through sustainable innovation. Key industries served include consumer, industrial, institutional, hospitality, food and beverage, and pool and spa water markets.

Solenis is headquartered in Wilmington, Delaware. Globally, the Company has 16,371 employees and 62 manufacturing sites. Our operations span approximately 160 countries and six continents, including the employees based in the reporting entities:

- 450 employees in Canada
- 859 employees in the UK
- 201 employees in Australia
- 122 employees in Norway

Solenis' product portfolio includes a wide 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.

Product / Service Line	Offerings
Commercial Cleaning	Building Care, Consumer Brands, Dilution Control Equipment, Diversey Consulting, Fabric Care, Floor Care, Infection Prevention, Kitchen Care, Personal Care, and TASKI Cleaning Machines.
Digital Solutions	Analyzers, Controllers, HexEval™ Performance Monitoring Program, Internet of Clean, OPTIX™ Applied Intelligence, and Solenis™ Cloud.
Food and Beverages	Bottlecare, Cleaning in Place, Conveyor Lubrications, Engineering, Equipment, Membrane Cleaning, Open Plant Cleaning, and Services.
Industrial Processes	Biorefining Process Aids, Corrosion Inhibitors, Defoamers, Microbiological Control Agents, Mineral Processing Aids, Oil & Gas Processing Aids, and Scale Inhibitors.
Pulp and Paper	Barrier Coatings, Colorants, Contamination Control Agents, Pulp Mill Additives, Retention & Drainage Aids, Sizing Agents, Strength Additives, Surface Treatments, and Tissue Making Additives.
Water Treatment	Boiler Water Treatments, Clearpoint™ Biofilm Detection & Control, Cooling Water Treatments, Raw Water Treatments, Recovery Boilery Treatments, Reverse Osmosis Membrane Treatments, and Wastewater Treatments.

For additional information about Solenis, please visit our website at [www.solenis.com](http://www.solenis.com)

## 2.2 OUR SUPPLY CHAIN

Solenis' supply chain consists of direct (materials suppliers) and indirect (consultants and services) Tier 1 suppliers. Our supply chain is integrated globally, and reporting entities are part of a global procurement process. While primary engagement is focused on Tier 1 suppliers, Solenis recognizes that salient human rights risks may also arise beyond Tier 1. Solenis therefore considers, where relevant, upstream supply chain tiers (including Tier 2 and Tier 3 through an N-tiering approach) as part of its risk screening approach.

In FY25, the reporting entities interacted with approximately 2,027 Tier 1 suppliers, including 700 goods and raw materials suppliers, and over 1,300 service providers.

The majority of our reporting entities' spend was with suppliers located in Canada, the United Kingdom, the United States, and Australia (32%, 23%, 22%, and 13%, respectively). The goods and services procured by the reporting entities, listed by order of spend, include:

- **Chemicals**, including chloralkali chemicals, polymers, surfactants, oils & solvents, and biocides, as well as contract manufacturing and tolling services.
- **Logistics**, including road and rail transportation, air and ocean freight, logistics services, and warehousing.
- **Commercial Services**, including Environmental, Health & Safety services, facilities maintenance and cleaning services, security services, and catering.
- **Construction**, including building materials, electrical and HVAC services, and third-party contractors.
- **Packaging**, including pallets, drums, bottles, labels, and corrugated cardboard.
- **Materials & Equipment**, including office and lab equipment and supplies, electrical and lighting materials, PPE, uniforms, and plant equipment maintenance, repair, and operations.
- **Information Technology**, including hardware, software, and services.
- **Fleet Management**, including leasing costs, repair and maintenance, and fuel.
- **Real Estate Services**, which consists primarily of leased office spaces.
- **Energy & Utilities**, including electricity, water, and gas.
- **Professional Services**, including audit and tax services, marketing and communications, and temporary labour and recruitment.

## 3. GOVERNANCE, POLICIES AND STANDARDS

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### 3.1 GOVERNANCE OVERSIGHT AND ACCOUNTABILITY

Solenis maintains robust sustainability governance practices to ensure material topics are managed at the highest level and we continue to evolve our approach to sustainability and human rights. Key mechanisms relevant to modern slavery and human rights governance are established in our Human Rights Management Plan and set out in the table below.

Our **Board of Directors** provides oversight, accountability, and strategic direction for Solenis' efforts to prevent and address modern slavery, forced labor, and human trafficking across our global operations and supply chains. Senior-level development and oversight of our human rights policies and assessment of modern slavery risks is embedded within Solenis' broader sustainability governance structure, led by the Chief Sustainability Officer and supported by multiple governance bodies including Solenis' Sustainability Task

Force Leadership Team and the **Human Rights Cross-Functional Working Group** (established during FY25).

The Working Group convenes relevant subject-matter experts from reporting entities and the global organization to evaluate risks, concerns, and coordinate actions on mitigation actions. Any escalation measures are routed through the Sustainability Leadership Team to the Executive Leadership Team and, when appropriate, the Board. Remediation responsibilities are shared among Human Resources, Legal, Employee Health & Safety, and the Office of Data Privacy, as detailed in Solenis' Internal Operations Human Rights Risk Assessment Policy. Supply chain human rights risks are governed through Solenis' Risk Management Program and managed by the Procurement Excellence team.

This governance framework applies to all entities owned or controlled by Solenis, LLC, including the reporting entities. Reporting entities implement Solenis' global policies and controls and escalate material risks through proper reporting channels, the Sustainability and Human Rights governance forums, the Executive Leadership Team and, as appropriate, to the Board. Risk assessment findings are integrated into our enterprise risk and sustainability processes, with responsibility across the organization.

## GOVERNANCE ROLES AND RESPONSIBILITIES RELEVANT TO MODERN SLAVERY AND HUMAN RIGHTS

Governance Body	Roles and Responsibilities
Board of Directors	<ul style="list-style-type: none"> <li>Provides oversight, accountability, and strategic direction for Solenis' efforts to prevent and address modern slavery, forced labor, and human trafficking across our global operations and supply chains</li> <li>Responsible for effective implementation and integration of our policies, controls and human rights practices</li> <li>Reviews and approves our Human Rights and Modern Slavery Due Diligence Report</li> </ul>
Operating Council	<ul style="list-style-type: none"> <li>Directs Solenis' business strategy and oversight</li> <li>Sets sustainability priorities and monitors progress</li> <li>Provides final review of annual sustainability results</li> </ul>
Solenis Leadership Team	<ul style="list-style-type: none"> <li>Leads the strategic planning process</li> <li>Reviews key initiatives supporting strategic goals</li> <li>Reviews and updates operating plans</li> <li>Reviews and approves the materiality matrix and corporate development efforts</li> </ul>
Solenis Leadership Council	<ul style="list-style-type: none"> <li>Manages and leads Solenis' day-to-day business operations</li> <li>Reviews and approves the sustainability strategy, goals, and materiality matrix</li> <li>Builds company commitment to human rights and a sustainability culture</li> <li>Ensures that company leadership is accountable for sustainability goals and progress</li> </ul>
Sustainability Leadership Team	<ul style="list-style-type: none"> <li>Develops the sustainability strategy and sets global ESG (including human rights) goals</li> <li>Drives company culture and education around ESG (including human rights)</li> <li>Leads ongoing data gathering and review</li> <li>Provides regular updates to the Operating Council, Solenis Leadership Council and Solenis Leadership Team on progress</li> </ul>
Human Rights Cross-Functional Working Group	<ul style="list-style-type: none"> <li>Established in 2025 to embed respect for human rights throughout the organization</li> <li>Comprising leaders from Legal, Human Resources, and Procurement</li> <li>Collaborates to ensure human rights upheld across our policies and business practices</li> <li>Meets at least monthly and regularly provide updates and escalates any issues to the Solenis Sustainability Leadership Team</li> </ul>
Legal Team and Office of Ethics and Compliance	<ul style="list-style-type: none"> <li>Provides legal, regulatory and international standards guidance</li> <li>Advises on legal risks, cross-border issues, and rights-compatible approaches</li> <li>Manages the Share Your Concern platform</li> </ul>

	<ul style="list-style-type: none"> <li>• Conducts or oversees investigations</li> <li>• Responsible for process integrity and alignment with the Code of Conduct and ethical standards</li> <li>• Monitors compliance and collects risk-related data through sources, including internal investigations and annual employee certifications of the Global Standards of Business Conduct. Data is processed within our Enterprise Risk Management approach and continuously informs revision of our policies, processes, training, and communications.</li> <li>• Responsible for direct engagement with workers, contractors, and community stakeholders. Where applicable, workers' unions and councils are engaged.</li> </ul>
Office of Data Privacy	<ul style="list-style-type: none"> <li>• Provides compliance with data privacy regulations</li> <li>• Manages data breach responses</li> <li>• Conducts regular privacy assessments to safeguard personal and organizational data</li> </ul>
Human Resources (HR)	<ul style="list-style-type: none"> <li>• Leads in employee-related cases</li> <li>• Responds to workforce issues involving harassment, discrimination, or retaliation</li> <li>• Implements corrective actions and promotes respectful workplace practices aligned with human rights principles</li> <li>• Creates and implements policies and training materials on non-discrimination, equal opportunity and safe work environment topics</li> </ul>
Site & Operational Management	<ul style="list-style-type: none"> <li>• Acts as frontline for issue identification and implementation of prevention and mitigation actions</li> <li>• Identifies and escalates concerns</li> <li>• Cooperates with local investigations</li> <li>• Engages directly with workers, contractors and community stakeholders</li> </ul>
Health & Safety (H&S)	<ul style="list-style-type: none"> <li>• Addresses H&amp;S concerns</li> <li>• Conducts regular safety audits</li> <li>• Reviews H&amp;S processes and procedures</li> <li>• Responsible for compliance with occupational H&amp;S and H&amp;S awareness</li> <li>• Audits and reviews controls at least annually, and in some cases on a more regular basis, to identify risks by testing and reviewing the effectiveness of the listed mitigation measures (Outlined in Pages 6-14 of the Internal Operations Human Rights Risk Assessment).</li> </ul>
Procurement / Procurement Excellence Team	<ul style="list-style-type: none"> <li>• Conducts supplier due diligence</li> <li>• Exercises leverage and enforces corrective action plans</li> <li>• Supports supplier capacity building and manages escalation process when suppliers are non-cooperative</li> </ul>

### 3.2 COMMITMENTS, POLICIES AND SUPPORTING DOCUMENTS

We are committed to implementing the [UN Guiding Principles on Business and Human Rights](#) (UNGPs) as well as the [OECD Due Diligence Guidance for Responsible Business Conduct](#) (OECD Guidelines). The UN Global Compact's (UNGC) Ten Principles are also reflected in our approach to due diligence implementation to proactively identify, prevent, mitigate and remediate potential and actual adverse human rights impacts we may cause or contribute to through our own activities or through our business relationships. In alignment with the UNGPs and the OECD Guidelines, we will also use our leverage to prevent or mitigate adverse human rights impacts we may be directly linked to across our operations and supply chain.

Responsible business conduct is embedded across our policies and management systems to promote respect for fundamental human rights and decent working conditions, and to prevent and reduce the risks of child labour, forced labour, modern slavery and human trafficking across our activities. These policies and processes apply to all reporting entities.

The policies and key procedures set out below, including the Human Rights Management Plan, were developed following internal consultation and external engagement including third-party expert human rights advisors. Policies are reviewed at a minimum every three years, or when there is a significant change in the

business, regulatory or operating context. We recognize enhancing engagement with external stakeholders as a future improvement area.

Our Global Standards of Business Conduct are available in 22 languages. Policy communication, enforcement and integration occur through training, employee onboarding, established management systems and commercial controls (specified in this report). Externally, we communicate and share our policies related to human rights, child and forced labour, and further information related to [Human Rights in our Supply Chain](#) and our [Supplier Risk Management Program](#) through a dedicated supplier page on our website and within our [Sustainability and Regulatory Library](#).

Policy	Relevance to the Management of Human Rights Risks
<b><u>Human Rights Policy</u></b>	<ul style="list-style-type: none"> <li>• Sets expectations for all employees and third parties to uphold fundamental human rights and prohibits forced labour, child labour, discrimination and unsafe working conditions.</li> <li>• Aligned with international standards, including the Universal Declaration of Human Rights (UDHR), the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social and Cultural Rights (ICESCR), and the ILO Declaration on Fundamental Principles and Rights at Work, and applies across Solenis' operations and supply chain.</li> </ul>
<b><u>Child and Forced Labour and Human Trafficking Policy</u></b>	<ul style="list-style-type: none"> <li>• Prohibits child labour, forced labour, slavery and human trafficking across all Solenis operations and facilities.</li> <li>• Extends these requirements to suppliers and contractors, ensuring consistent standards across the supply chain.</li> </ul>
<b><u>Human Rights Management Plan</u></b>	<ul style="list-style-type: none"> <li>• Developed in FY25 to consolidate our Internal Human Rights Risk Assessment and Supplier Risk Assessment Protocol into a single enterprise framework aligned with the UNGPs and ILO Core Conventions.</li> <li>• Introduces a Remedy Framework to strengthen learning from grievances and prevent future human rights impacts.</li> </ul>
<b><u>Labor Practices Commitment</u></b>	<ul style="list-style-type: none"> <li>• Defines Solenis' expectations for fair and compliant labour standards across operations and the supply chain, including freedom of association, living wage, working hours and Occupational Health and Safety.</li> <li>• Reinforces Solenis' commitment to building an inclusive, safe and sustainable workplace.</li> </ul>
<b><u>Global Standards of Business Conduct</u></b>	<ul style="list-style-type: none"> <li>• Establishes ethical and legal expectations for all employees globally, including responsibilities relating to human rights, compliance and responsible behaviour.</li> <li>• Forms the foundation of Solenis' global compliance program and is overseen by the Office of Ethics and Compliance.</li> </ul>
<b><u>Responsible Care framework</u></b>	<ul style="list-style-type: none"> <li>• Guides Solenis' environmental, health, safety and security practices across all operations to ensure high performance and responsible business conduct.</li> <li>• Supports continuous improvement in risk management, compliance and operational excellence.</li> </ul>
<b><u>Supplier Code of Conduct</u></b>	<ul style="list-style-type: none"> <li>• Sets minimum human rights, labour and ethical requirements for all suppliers, including prohibitions on child labour, forced labour and human trafficking.</li> <li>• Aligned with Solenis' internal policies and international frameworks and integrated into all supplier contracts.</li> <li>• Updated in FY25 to improve supplier awareness of our grievance mechanism, Share Your Concern</li> </ul>
<b><u>Global Procurement &amp; Responsible Sourcing Policy</u></b>	<ul style="list-style-type: none"> <li>• Requires sourcing only from suppliers that prohibit child labour, forced labour, slavery or human trafficking, supporting responsible and ethical procurement.</li> <li>• Updated in December 2025 to strengthen purchasing controls, local content requirements and supplier risk management processes.</li> </ul>
<b><u>Supplier Risk Assessment Protocol</u></b>	<ul style="list-style-type: none"> <li>• Updated to incorporate recent enhancements consolidated in the 2025 revision, strengthening Human Rights Risk Due Diligence and reinforcing a risk-based, lifecycle approach to supplier risk management.</li> <li>• Applies an enhanced, tiered risk management approach, with proportionate due diligence and targeted mitigation measures for higher-risk suppliers to support continuous improvement.</li> </ul>

<p><b><u>Conflict Minerals Policy</u></b></p>	<ul style="list-style-type: none"> <li>• Commits to ensuring that the procurement of raw materials, intermediates and other goods complies with the U.S. SEC Conflict Minerals Rule (Section 1502 of the Dodd–Frank Act) and the EU Conflict Minerals Regulation.</li> <li>• Supports responsible sourcing practices by requiring suppliers to avoid minerals that finance armed conflict and to maintain traceability and due-diligence measures across their supply chains</li> </ul>
<p><b><u>Internal Operations Human Rights Risk Assessment</u></b></p>	<ul style="list-style-type: none"> <li>• Enterprise-wide, risk-based process to identify, assess, and manage human rights risks within Solenis' own operations, reviewed at least annually.</li> <li>• Informs mitigation, remediation, and escalation through Solenis' governance and enterprise risk management processes, aligned with international standards.</li> </ul>
<p><b><u>Hiring Due Diligence Protocol</u></b></p>	<ul style="list-style-type: none"> <li>• Establishes mandatory controls across recruitment, hiring, and onboarding to prevent child labour, forced labour, human trafficking, discrimination, and pay inequity.</li> <li>• Applies globally to employees, contractors, and temporary workers, supported by audits, training, and formal reporting and remediation mechanisms.</li> </ul>
<p><b><u>Community Relations Policy</u></b></p>	<ul style="list-style-type: none"> <li>• Outlines how we engage and collaborate with the communities where we operate.</li> </ul>

## 4. HUMAN RIGHTS DUE DILIGENCE

Solenis is committed to conducting human rights due diligence, defined as our efforts to assess, prevent, and mitigate human rights risks, including forced and child labour risks, within our operations and supply chains, in compliance with laws and regulations.

As set out in our Corporate Human Rights Management Plan (The Plan):

- 'Risk' is defined as the potential impact of our business on stakeholders and rightsholders that could occur in the future.
- 'Adverse Human Rights Impact' is defined as a negative effect on the enjoyment of human rights, caused, or contributed to by Solenis or linked to our operations, products, or services. An 'actual impact' refers to one that has already occurred.

Our overarching due diligence process is further detailed in the following sections. As of 2024, and as defined in The Plan we have identified salient human rights issues across our own operations and supply chain. We define 'salient' as the human rights at greatest risk of severe negative impact through Solenis' activities or business relationships. The topics identified are: freedom of association and collective bargaining, working conditions (including compensation, workplace environment and working time), child labor or other illegal forms of labor (including forced labor and human trafficking), employee health and safety, discrimination (including equal opportunity and vulnerable group protection), employee data security, community well-being, health and safety; and environmental impacts on people (including a clean environment)..

## 5. OWN OPERATIONS DUE DILIGENCE

Assessment of human rights and modern slavery risks in our operations consists of a range of processes, including merger and acquisition (M&A) assessments, governed by the **Internal Operations Human Rights Risk Assessment Policy**.

### 5.1 OWN OPERATIONS RISK ASSESSMENT AND MANAGEMENT

- We assess risks in operations at least annually, or more frequently as warranted by business, regulatory changes, or if risks are identified.

- Risk assessment applies an evaluation framework based on ‘likelihood’ (defined as probability of the risk occurring), and ‘impact’ (defined as the potential consequences, or severity of risk to the business). The definitions are informed by Solenis’ double materiality assessment (DMA), which considered financial and non-financial risks and impacts and gathered stakeholder input. Criteria are monitored and reassessed based on global developments. Aligning the definition of impact, risk matrix, and severity criteria to the UNGPs (to consider scale/scope/irremediability) is an identified improvement area for the next reporting year.
- Where our human rights assessment processes identify human rights or modern slavery risk areas in our operations, we establish actions to mitigate risks and prevent adverse impacts. Where risks/potential impacts are identified, Solenis determines our relationship to these risks (in alignment with the UNGPs, i.e., cause, contribute, directly linked), the root causes and drivers (e.g., policy gaps, supplier practices, operational pressures), and potential consequences for affected individuals or communities. This may include engaging with relevant stakeholders to understand context and lived experience. This informs prioritization of risks and design of prevention and mitigation measures.
- Our **Human Rights Management Plan** establishes mitigation measures that we have implemented for a range of identified risks, including labor and community risks.
- These processes are applied across Solenis operations, including the reporting entities outlined in this Report, through site level assessments, ongoing employee and workforce monitoring reporting, and M&A due diligence activities.

Our **Internal Operations Human Rights Risk Assessment Policy** outlines the key risks identified through the risk assessment process and the corresponding mitigation strategies we have adopted.

- We understand there are inherent human rights-related risks in the chemical industry, including occupational health and safety risks in the production, handling, and transportation of materials, as well as the use of contractors or temporary labour during maintenance, shutdowns, or peak activity periods, and the integration of newly acquired entities through M&A.
- Modern slavery risks are covered through consideration of forced, compulsory, and child labour, human trafficking, or other coercive or exploitative practices (e.g., debt bondage), working conditions, discrimination, freedom of association, and health and safety. As noted above, freedom of association and collective bargaining, working conditions, child labor or other illegal forms of labor are defined salient topics. The risks of forced or child labour in our directly employed workforce are considered as low.
- Broader human rights risk considerations include impact on indigenous or vulnerable communities, failure to respect cultural or indigenous rights, inadequate grievance and remedy mechanisms, lack of transparency or stakeholder engagement, and security or community health and safety incidents.
- Implemented mitigation measures include adherence to global labor standards and local employment laws across all operations, requiring third-party labor providers to follow Solenis’ labor standards, regular payroll audits and competitive benchmarking studies, supporting fair and transparent processes for union formation, recognition and engagement with employee representatives or advisory councils, site-specific community relations plans and provision of Share Your Concern, our confidential and accessible grievance mechanism.

### 5.1.1 SITE-LEVEL RISK ASSESSMENT AND MANAGEMENT

Every Solenis production site that supplies a product to a particular customer completes, where needed, a SEDEX self-assessment questionnaire (SAQ), aligned with the SEDEX Members Ethical Trade Audit (SMETA) pillars. The SAQ covers human rights, child labour, forced and involuntary prison labour, modern slavery, ethical recruitment, and labour conditions. Where on site audit identifies improvement areas, we set out corrective actions. For example, in FY25, a site with identified areas for improvement in safe and hygienic

working conditions and policies regarding work hours was given 60 days to implement corrective actions, verified by a follow-up audit.

### 5.1.2 WORKFORCE ASSESSMENT AND MANAGEMENT

We are committed to respecting human rights across our workplace, including in relation to employees, officers, contractors and temporary workers, and apply a globally standardised **Hiring Due Diligence Protocol** to help mitigate risks of forced labour, child labour, discrimination and human trafficking. The protocol sets out our recruitment and onboarding processes in line with our Global Standards of Business Conduct and Human Rights Policy, which addresses key human rights concerns. Ongoing monitoring and prevention measures include the following (with further progress and metrics set out in section 9.2):

- Age verification (100% new hires screened); voluntary employee termination rights; coverage of employees (37%) by unions or collective bargaining; and third party labour rights requirements.
- Review of gender and pay equity; partnerships with organizations that support employment of individuals with protected characteristics, expanding access to inclusive employment opportunities
- Reporting and tracking of occupational health and safety hazards and near-miss events through the EH&S Velocity portal. In total, more than 20,000 hazard IDs (proactive safety enhancements) were submitted and actioned, leading to corrective actions focused on PPE compliance, housekeeping improvements to prevent slips, trips, and falls, and enhanced equipment safety controls and inspections
- Routine checks and awareness raising activities with regard to data privacy and Ethics/Compliance, including dedicated Data Privacy and Ethics and Compliance Weeks for enhanced training and knowledge-sharing
- Issuing of Solenis' annual culture survey, which achieved 96% employee participation and reflected an improvement in overall employee satisfaction to 80% (from 78% year-over-year), providing an additional channel for employees to raise concerns and enabling corporate and managerial functions to assess potential risks and trends across key areas
- In the 104 countries where Solenis employees are covered by unions or works councils, we conducted more than 525 meetings with representative bodies in FY25. These meetings covered human rights topics such as working conditions (health and safety, working hours, and workload), changes in compensation mechanisms, restricting, social plans, return in work programs, and in Spain, a legally mandated Equality Plan.
- Maintenance of the Share Your Concern Portal. Noting that during the reporting period, no human rights violations were reported through the portal in relation to hiring or employment practices.

### 5.1.3 MERGERS AND ACQUISITIONS (M&A)

Solenis assesses human rights and modern slavery risks that may arise through M&A transactions prior to finalizing any formal agreement. The due diligence process, as detailed in our Human Rights Management Plan covers:

- the target company's labour and human rights practices
- compliance with international labour standards, including wages, working hours, freedom from child and forced labour and legal employment status, and
- the presence or absence of formal grievance mechanisms.

Once the business transaction is complete, Solenis takes a series of prevention and mitigation actions. These actions ensure alignment with our human rights standards and where needed, we implement remediation, as described in our Human Rights Management Plan. In FY25, 100% of new business transactions were

assessed for human rights risks. All identified risks were mitigated, and no remediation actions were required. For FY26, we have added additional M&A due diligence to ensure 100% of M&A transactions undergo human rights due diligence during pre-acquisition review.

## 6. SUPPLY CHAIN DUE DILIGENCE

Our supply chain due diligence and risk management approach is supported by a combination of policies, management programmes, assessment protocols, and technology, which together provide a structured and consistent framework for identifying, assessing, and addressing modern slavery and broader human rights risks across our supply chain.

### 6.1 SUPPLY CHAIN RISK ASSESSMENT APPROACH

Solenis identifies potential human rights and modern slavery risks in its supply chain through its Supplier Risk Management Program and complemented by our Supplier Risk Assessment Protocol. This Program includes supplier risk identification, screening, deeper due diligence, analysis, mitigation, and continuous monitoring and reporting, as represented in below process flow diagram:



Solenis' supplier risk management is supported by industry-leading technology tools (Interos, Coupa, Kharon and Tableau), which enable external risk screening, multi-tier supply chain visibility up to Tier 3, risk based due diligence and mitigation activities, targeted human-rights deep-dive checks, and consolidated reporting.

In 2025, we updated the Protocol to incorporate a new 'deep dive on Human Rights Due Diligence' and a reinforced risk-based, lifecycle approach to supplier risk management. This is supported by our use of third-party technologies, such as:

- Interos (Risk Identification and Screening Platform): Supported by Artificial Intelligence (AI), the platform is used to conduct initial risk screening of in-scope suppliers using external data sources and proprietary databases accessed through strategic partnerships. Interos also provides N-tier supply chain risk visibility up to Tier 3, where relevant, to support early identification of potential human-rights and modern slavery risks in upstream supply chain tiers and to inform subsequent due diligence, escalation and mitigation activities.
- Coupa (Risk Management Platform): This enables supplier due diligence through the collection of ESG information, including human rights and modern slavery risks. It requires formal acknowledgement of our Supplier Code of Conduct and manages ongoing risk mitigation activities, including tracking corrective action plans.
- Kharon (Human Rights Due Diligence): This enables a deep dive into Sanctions Screening & Human Rights Risks such as forced labor in global supply chains.

- Tableau (Risk Reporting): This enables the continuous flow of risk data to Procurement Professionals and Solenis Leadership for risk monitoring purposes to make more informed decisions.

During the reporting period, key actions to assess risk and improve supplier due diligence included:

- Continuous risk screening of in scope suppliers through Interos as part of the Supplier Risk Management Program. This included more than 600 direct tier 1 suppliers and 40,000 Non tier 1 suppliers in the reporting year. Interos scope is global and supplier-based, and therefore not limited to the Solenis entities or countries covered by this report.
- Annual human rights risk assessments for targeted suppliers based on country and industry-level, as detailed in Appendix B and C of our Supplier Risk Assessment Protocol, using international standards, guidance, and legislation to assess country and sector exposure to human rights, labor, and supply chain risks (e.g., OECD Conflict-Affected and High-Risk Areas and ILO Standards). The full list of data sources used for country and industry risk classification and resulting risk scores is included in the Protocol.
- Ongoing supplier requirements to accept and comply with our Supplier Code of Conduct or maintain equivalent principles in their own code (submitted to Solenis Legal team review).
- In FY25, Solenis enhanced its Supplier Risk Management Program, transitioning from the legacy Global Risk Management Solutions (GRMS) platform to a more robust, integrated approach combining Interos risk intelligence and the Coupa supplier risk management platform.

## 6.2 INHERENT SUPPLY CHAIN RISK FACTORS

The review of FY25 supplier data identified potential inherent human rights risks related to suppliers' locations, sectors, and products or services supplied to Solenis.

The risks described here are potential or inherent based on key human rights and modern slavery indicators present in these countries and sectors. They are general in nature and do not represent specific issues or practices found in our procured products or services. In addition to this analysis, we continuously assess inherent risks as part of supplier screening.

### 6.2.1 GEOGRAPHIC RISK

Solenis' Tier 1 suppliers operate across multiple geographies with varying levels of human rights and modern slavery risk exposure. In accordance with the Supplier Risk Assessment Protocol (Annex C), and supported by third-party subject-matter expert (SME) review, a subset of countries has been identified for country-level risk assessment.

The following 18 countries are those assessed and classified within the Risk Protocol as presenting low, medium, or high/critical risk:

- Low-risk countries: Canada, Australia, Norway, Germany, Netherlands, Sweden, Japan, Finland, Italy, Romania.
- Medium-risk countries: the United States, Indonesia, India, Kenya, and Thailand.
- High / Critical-risk countries: China, Vietnam, and Turkey.

### 6.2.2 PRODUCT AND SECTOR RISK

Elevated risk indicators were identified in the following areas, and are aligned with Solenis' industry risk classification in the Supplier Risk Assessment Protocol:

Product	Industry	Relevance to Solenis	Risk Indicators
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Caustic soda	Extractives	Caustic soda is a commodity chemical, used in the production of our cleaning and water treatment products.	Identified as a high-priority sector under the UFLPA due to production in high-risk regions and associated forced-labour exposure.
Aluminium / bauxite	Extractives	Aluminium-based chemicals are used in water treatment and paper manufacturing products.	Solenis' aluminum-based products carry upstream risks stemming from bauxite mining. These risks include forced resettlement, low wages, and adverse impacts on local communities and land rights in major bauxite-producing regions.
Silica	Extractives	Silica is used in water treatment products and has similar risks due to upstream mining activities.	Risks include forced and child labour in extraction, health and safety issues across the supply chain, and sourcing from high-risk or conflict-affected areas. <sup>1</sup>
Electronics	Electronics & ICT	Solenis purchases IT hardware, including PCs, tablets, servers, and hardware accessories and parts to support day-to-day operations.	Documented upstream exposure to forced and child labour, including manufacturing in high-risk geographies, and conflict-mineral supply chains.
Petrochemicals	Chemical Industry	Petroleum-derived chemicals are used in Solenis products by way of synthetic polymers, surfactants, and chemical feedstocks.	Labour-rights risks in oil and gas extraction and potential significant community health impacts near petrochemical operations.
Rosin/forestry inputs	Agriculture	Rosin, used by Solenis in the form of rosin adducts and tall oil rosins, is a natural pine resin whose byproducts are used in paper sizing agents, adhesives, and coatings.	Vulnerabilities include seasonal and migrant labour exploitation, recruitment-fee risks, subcontracting opacity, and Indigenous land-rights issues.
Ocean freight and logistic third-party services	Transportation & Logistics	Solenis' spend includes several modes of transportation, including road, rail, and air; however, ocean freight has higher risks of human rights risks.	High-risk indicators include recruitment-fee debt bondage, withheld wages, <sup>2</sup> excessive working hours, and reduced labour oversight due to flag-of-convenience practices. <sup>3</sup>
Third-party cleaning, facilities maintenance, and security	Hospitality	Solenis outsources these services as part of routine facility management.	High risk exposure is based on the presence of vulnerable migrant workers, wage theft, subcontracting, including in 'low risk' jurisdictions.

### 6.3 SUPPLIER RISK MANAGEMENT PROGRAM

The following table sets out the core practices in our Supplier Risk Management Program, which was enhanced substantially during FY25.

Stage	Action
<b>1. Supplier Risk screening, identification, and scoring</b>	<ul style="list-style-type: none"> <li>• Solenis classifies suppliers using the Interos platform (adopted during the reporting period), which sets out:               <ul style="list-style-type: none"> <li>○ Risk scoring based on the nature and potential severity of risks (including ESG, human rights, cyber, financial, geopolitical)</li> <li>○ 40k+ Non tier 1 suppliers screened in FY25</li> </ul> </li> </ul>

<sup>1</sup> [RBC risks and impacts in sand and silicate supply chains: Due Diligence for Responsible Sand and Silicate Supply Chains | OECD](#)

<sup>2</sup> [IHRB - Seafarers and Illegal Recruitment Fees: 2024 Insights](#)

<sup>3</sup> [The risks of modern slavery in maritime supply chains | Global law firm | Norton Rose Fulbright](#)

	<ul style="list-style-type: none"> <li>○ 600+ direct material suppliers representing &gt;70% of direct spend have been screened in FY25. Interos scope is global and supplier-based, and therefore not limited to the Solenis entities or countries covered by this report. As a result, supplier data reflects those included in the Supplier Risk Program based on defined risk criteria, irrespective of geography.</li> </ul>
<p><b>2. Enhanced risk diligence (high-risk suppliers)</b></p>	<ul style="list-style-type: none"> <li>• Following screening using the Interos Platform, any Tier 1 supplier that is identified with a potential risk of human rights violations will prompt a secondary in-depth due diligence investigation through Kharon, reported in Coupa.</li> <li>• Following monitoring: when a supplier receives a high or extreme risk score in the Interos screening platform, Solenis: <ul style="list-style-type: none"> <li>○ Initiates through Coupa deeper due-diligence using domain-specific questionnaires developed by Category Leads, the Supplier Risk team, and Subject Matter Experts;</li> <li>○ Requests additional supplier documentation;</li> <li>○ May conduct on-site assessments if desk-based verification is insufficient.</li> </ul> </li> <li>• Regardless of the risk screening outcome, all direct suppliers classified as Strategic Chemical suppliers, located in critical or high-risk countries operating in high-risk industries (as defined in Appendix C of our Supplier Risk Assessment Protocol), will be subject to an ESG due diligence review every 12 months, or sooner if there are significant business changes. Coupa platform was adopted during the reporting period.</li> </ul>
<p><b>3. Continuous Supplier risk monitoring</b></p>	<ul style="list-style-type: none"> <li>• Inherent risk scores are continuously monitored through Interos. Solenis utilizes the Interos risk screening platform to support continuous risk monitoring for: <ul style="list-style-type: none"> <li>○ ESG risks, including human rights</li> <li>○ Sanctions/UFLPA exposure;</li> <li>○ Other risks including geopolitical, cyber, and financial risks.</li> <li>○ Alerts flag elevated risk levels and Tier-1 red flags trigger deeper review.</li> </ul> </li> </ul>
<p><b>4. Corrective action and supplier management</b></p>	<ul style="list-style-type: none"> <li>• Solenis utilizes the Coupa risk platform to support risk mitigation as follows: <ul style="list-style-type: none"> <li>○ Solenis assigns detailed corrective action plans (CAPs) with defined timelines based on the results of the enhanced due diligence initiated by Coupa.</li> <li>○ Suppliers must provide evidence of improvement to maintain approved status, and automated reminders are issued through Coupa.</li> <li>○ For ESG and human rights-related risks, suppliers must demonstrate progress within 45 days, or we will take escalatory steps.</li> <li>○ Failure to improve may lead to new-business hold or identification of alternate suppliers.</li> </ul> </li> </ul>
<p><b>5. Contractual controls and compliance verification</b></p>	<ul style="list-style-type: none"> <li>• Solenis embeds human-rights expectations through standard sustainability clauses in supplier contracts, which include: <ul style="list-style-type: none"> <li>○ Mandatory adherence to the Solenis Supplier Code of Conduct and Human Rights &amp; Anti-Slavery Policy;</li> <li>○ Explicit prohibition of forced, compulsory, and child labour across suppliers' operations and supply chains;</li> <li>○ Requirement for suppliers to implement due diligence procedures on their own suppliers and subcontractors;</li> <li>○ Obligation to promptly notify Solenis of any actual or suspected breaches of anti-slavery requirements</li> <li>○ Suppliers must cooperate with audits, provide supply chain transparency, report breaches, and are subject to corrective actions up to and including contract termination for non-compliance</li> </ul> </li> <li>• We have implemented a risk exposure assessment for all supplier contracts in scope, to ensure potential risks are identified before supplier onboarding and then managed through our Contract Life Cycle Management process.</li> </ul>
<p><b>6. Supplier engagement (communication and support)</b></p>	<ul style="list-style-type: none"> <li>• Solenis engages suppliers through: <ul style="list-style-type: none"> <li>○ 652 direct suppliers onboarded to the Coupa Portal;</li> <li>○ 3 webinars on Coupa and supplier-risk processes including the biannual Supplier Risk webinar (inviting 149 suppliers);</li> <li>○ One-on-one supplier meetings;</li> <li>○ 139 annual supplier feedback surveys (Voice of Supplier)</li> <li>○ 94 supplier performance scorecards</li> </ul> </li> </ul>

<b>7. Leadership oversight and escalation route</b>	<ul style="list-style-type: none"> <li>• The Procurement Excellence Director and Leadership Council oversee the Supplier Risk Management Program.</li> <li>• An independent third-party verifies supplier-screening data annually</li> <li>• Findings inform continuous-improvement actions.</li> </ul>
<b>8. Link to grievance and remedy</b>	<ul style="list-style-type: none"> <li>• Suppliers and workers can report concerns via Share Your Concern (24/7 anonymous hotline + web portal).</li> <li>• Reports feed into Solenis' investigation and remediation processes (see Section 7.2).</li> </ul>

## 7. STAKEHOLDER ENGAGEMENT AND REMEDIATION

### 7.1 STAKEHOLDER ENGAGEMENT

Stakeholder engagement is integral to achieving our sustainability and human rights commitments. Our sustainability leadership reviews key stakeholders and our engagement approach annually. We proactively create dialogue with our stakeholders to assess and gain insight into the environmental, social, and governance issues that we face internally and externally, including human rights. Our [2025 Sustainability Report](#) provides further details.

#### 7.1.1 COMMUNITY AND EMPLOYEE ENGAGEMENT

In FY25, we developed and published our **Community Relations Policy**, which outlines, at a site level, how we proactively engage and collaborate with the communities where we operate. Each production location with 10 or more people is required to have a Community Relations Plan, reviewed at least annually by senior site leaders for results and updates. These plans reflect the needs of the local stakeholders and vary according to our operation profile. Local stakeholders are identified through a structured assessment process, including community mapping and engagement with local authorities and organizations.

- Vulnerable groups, such as low-income households, Indigenous populations, or marginalized communities, who may be at greatest risk of potential or actual human rights impacts from our operations, are prioritized for engagement.
- Community and employee engagement occurs through meetings, open houses and suggestion programs.
- Additional employee engagement occurs during meetings with unions and works council representatives.
- All external stakeholders have access via our Share Your Concern reporting platform (see Grievance Mechanisms for more details).

#### 7.1.2 SUPPLIER ENGAGEMENT

Solenis regularly engages with suppliers on human rights due diligence through one-on-one meetings and through supplier performance scorecards. We also request annual supplier feedback through online surveys (Voice of Supplier) to identify potential areas for improvement and collaboration opportunities.

#### 7.1.3 INDUSTRY AND CUSTOMER ENGAGEMENT

In addition to engaging with local affected communities and suppliers, Solenis actively engages with NGOs and industry initiatives focused on modern slavery and human rights. In FY25, we engaged with Sustenuto to demonstrate Gold Level conformance with the Social Fairness pillar of Cradle to Cradle (C2C) Certification. As part of this engagement, we updated our Human Rights Policy to reflect our commitment to respect human rights established in the International Bill of Human Rights.

We also collaborate with our customers to build an understanding of human rights risks. For example, we supported our hospitality customers and communities by conducting Anti-Sexual Exploitation of Children in Travel and Tourism (Anti-SECTT) awareness training programs for hospitality employees around the world. The program equips hotel staff with the tools to identify signs of child sexual abuse, intervene safely and effectively, and report concerns to local authorities. Since 2014, hundreds of hotel workers across more than 22 countries have received this training. It is developed and led by a senior Solenis employee who is also a child protection advocate with the International Child Protection Network (ICPN). Local representatives from our company are involved in setting up the training for their customers.

## 7.2 GRIEVANCE AND REMEDIATION

### 7.2.1 GRIEVANCE MECHANISMS

Solenis offers a dedicated grievance and reporting mechanism to effectively address concerns, in accordance with our **Reporting Policy**, **Share Your Concern**, our 24-hour anonymous and confidential reporting platform, is accessible to all employees, business partners, communities 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 34 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.

Employees are similarly encouraged to share concerns, initiate complaints, or ask questions by speaking with line managers, Human Resource managers, directly with our Office of Ethics and Compliance or Legal Department. We also provide specific internal resources for suppliers and their employees to ask questions, request information or report concerns confidentially through a dedicated e-mail resource.

### 7.2.2 REMEDIATION

When adverse human rights impacts 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.

As laid out in our Human Rights Management Plan, once Solenis' level of **potential involvement** in an identified existing or potential harm is determined, we then implement proportionate measures to cease or prevent the impact and apply appropriate mitigation or remediation measures. This involves assessment of whether Solenis caused, contributed to, or is directly linked to the harm through its operations, supply chain, or business relationships, in line with UNGPs.

In FY25, we developed our **Remedy Framework** to strengthen responses to human rights and modern slavery concerns, with implementation planned for FY26. Our approach and framework are aligned with the UNGPs, and we recognize that effective remediation is a critical component of our broader human rights approach. Our Human Rights Remedy Framework will be annually evaluated based on 10 operating principles and KPIs, specified in our Human Rights Management Plan.

Alongside development of our Remedy Framework in FY25, we continued to follow 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 Policy**, 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.

Our **Remediation Pathway** outlines the structured process we follow when a concern is raised, beginning with the submission of a grievance through our Share Your Concern platform or the other channels described above, and continuing through the initial response to investigation, remedy, engagement and prevention. Findings from our internal investigations process directly inform the scale and type of remedy implemented.

**Remediation measures** may include different forms of compensation or remedies for any violations, including, but not limited to, formal apologies or restitution, financial or non-financial compensation, disciplinary measures for responsible parties, training, reinstatement of affected workers, access to support services, or policy and process reforms to prevent recurrence. We provide specific examples of targeted remediation measures for human trafficking and forced or child labour in our Internal Operations Human Rights Risk Assessment and Due Diligence Protocol.

We did not receive any reports or incidents from employees or stakeholders through our grievance mechanism or other channels related to any form of modern slavery, child or forced labour or other human rights impact in FY25.

## 8. TRAINING AND CAPACITY BUILDING

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### 8.1 TRAINING FOR EMPLOYEES AND CONTRACTORS

Our **Annual Training and Communication Plan** sets out mandatory annual training requirements for all employees globally on key compliance areas, including key topics such as modern slavery covered under our Global Standards of Business Conduct, and our policies.

Employees are required to review and certify their compliance with mandatory trainings annually, as specified in our Human Rights Management Plan. Training materials cover the Global Standards of Business Conduct, EU General Data Protection Regulation and Global Workplace Harassment Prevention for Managers. Each year, employees must certify their compliance. The Office of Ethics and Compliance actively follows up on all outstanding certifications, and continuously looks for process improvement opportunities. Starting in 2024, these compliance trainings were also made available to contractors.

In FY25, employee completion rate of mandatory training was greater than 70%.

Additionally, we utilize the **Procurement Learning Journey**, a platform that summarizes all the skillsets and knowledge we expect our Global Procurement team members to grow and develop, which includes annual training on sustainability, human rights, supplier Code of Conduct policy and supplier risk management. The Procurement Learning Journey had a 100% attendance rate in FY25 and is reviewed annually.

In FY25, we launched a dedicated mandatory Human Rights Procurement Training module which includes six lessons covering human rights, supplier obligations and due-diligence expectations. Training was completed by 100% Global Procurement team (170 employees). Specific modern slavery topics included lessons on forced labour, best practice and excessive working hours. The training material was developed by our Office of Ethics and Compliance.

### 8.2 SUPPLIER CAPACITY BUILDING

We proactively engage with our business partners to increase risk awareness, build capacity and foster compliance. We launched and onboarded 652 suppliers to the Coupa Supplier Portal in FY25 which requires supplier acknowledgement of our Supplier Code of Conduct and completion of an ESG enrollment questionnaire. As part of the portal launch, we hosted 3 Coupa Supplier webinars increasing communication

and understanding of Coupa, including the biannual supplier webinar focused on our Supplier Risk Management Program (inviting 149 suppliers).

## 9. ASSESSING EFFECTIVENESS

### 9.1 PERFORMANCE GOVERNANCE AND CONTINUOUS IMPROVEMENT

Solenis monitors the effectiveness of its human rights and modern slavery approach through a combination of governance reviews, internal assessments, supplier-risk monitoring, and independent verification. Monitoring assessments are conducted at least annually for in-scope activities outlined in the Internal Operations Human Rights Risk Assessment and the **Supplier Risk Assessment Protocol**. Effectiveness is evaluated using criteria within the Human Rights Management Plan, aligned with the UNGP Reporting Framework, and applied during FY25.

At the operational level, findings from human-rights assessments, investigations and remediation activities are reviewed by relevant internal functions and incorporated into enterprise-risk and sustainability processes. Significant developments may be escalated to governing bodies as appropriate.

Within the supply chain, effectiveness is reinforced through the Supplier Risk Management Program, with oversight by the Solenis Leadership Council and accountability held by the Procurement Excellence Director. Solenis also engages a third-party service provider to conduct annual verification of supplier-screening data, with results used to inform continuous improvement efforts.

Performance is tracked using internal KPIs, supplier-engagement metrics, and external assurance of sustainability disclosures. Solenis discloses human-rights and modern-slavery-related information annually through its externally assured Sustainability Report, supported by an ESG Data Table and GRI Content Index.

### 9.2 KEY TARGETS, INDICATORS AND KEY ACHIEVEMENTS

Solenis has set the following targets to further strengthen the effectiveness of our human rights supply chain due diligence by 2030:

- 90% of our direct supplier spend meets our Sustainability requirements, including human rights-related, by acknowledging the Supplier Code of Conduct
- 70% of our direct supplier spend is covered by a recognized external or internal sustainability assessment (including human rights due diligence)

The table below sets out key achievements and relevant indicators or metrics for the reporting period (FY25):

Area	FY25 Results
Operations: human rights assessments	<ul style="list-style-type: none"> <li>• 100% of new hires screened for child labor risks</li> <li>• 100% of operations assessed within last three years</li> <li>• 100% of identified risks (where applicable) had mitigation actions implemented.</li> </ul>
Operations: incidents reported	<ul style="list-style-type: none"> <li>• No reports or incidents of forced labour, child labour, or other human rights impacts received through grievance channels or other mechanisms in FY25.</li> </ul>
Living wage progress	<ul style="list-style-type: none"> <li>• Continued reduction of identified living wage gaps through participation in engagement with the Fair Wage Network and monitoring of compensation levels.</li> </ul>
Supplier ESG assessments	<ul style="list-style-type: none"> <li>• +70% of direct spend suppliers screened for ESG risk (including child or forced labor)</li> <li>• 216 direct suppliers assessed for ESG risk (including child or forced labor)</li> </ul>

	<ul style="list-style-type: none"> <li>• 15 direct suppliers identified as potentially high-risk</li> <li>• 100% of these suppliers were engaged, and mitigation plans implemented</li> <li>• 48% of direct-spend suppliers covered by a recognized external or internal sustainability assessment.</li> </ul>
Supplier Code of Conduct acknowledgement	<ul style="list-style-type: none"> <li>• 53% of direct-spend suppliers acknowledged the Supplier Code of Conduct.</li> </ul>
Supplier onboarding (Coupa Portal)	<ul style="list-style-type: none"> <li>• 652 direct suppliers onboarded</li> <li>• 3 webinars on Coupa and supplier-risk processes including the biannual Supplier Risk webinar</li> </ul>
Supplier corrective actions	<ul style="list-style-type: none"> <li>• All identified potential high-risk suppliers (15) had mitigation plans implemented and monitored to completion.</li> </ul>
C2C Social Fairness engagement	<ul style="list-style-type: none"> <li>• Continued engagement with Sustenuto to demonstrate CradletoCradle (C2C) Social Fairness Gold level conformance.</li> </ul>
Anti-SECTT training for customers	<ul style="list-style-type: none"> <li>• Delivered Anti-Sexual Exploitation of Children in Travel and Tourism (Anti-SECTT) awareness training to hospitality clients.</li> </ul>
Grievances and remediation	<ul style="list-style-type: none"> <li>• No reports of modern slavery or child/forced -labour concerns identified</li> <li>• Remediation processes updated through development of the Remedy Framework (implementation planned FY26).</li> </ul>
Human Rights Due Diligence system improvements	<ul style="list-style-type: none"> <li>• Cross-functional human rights working group established</li> <li>• Introductory human rights/modern slavery materials disseminated</li> <li>• Human rights gap assessment completed</li> <li>• Human Rights Management Plan developed</li> <li>• Remedy Framework developed</li> <li>• Human rights assessments and direct targeted suppliers risk screening processes integrated into dashboards and continuous improvement cycles.</li> </ul>

For our disclosure performance against GRI, see Appendix 13.

## 10. FUTURE FOCUS AND COMMITMENTS

Building on this foundation, in FY26 we intend to:

- Publish and fully implement our corporate-level Human Rights Management Plan.
- Publish, fully implement our Human Rights Remedy Framework and track progress against defined KPIs.
- Works towards obtaining Living Wage Certification through Fair Wage Network by 2027. Achieving certification will independently validate that employees across our workforce are paid a living wage, reinforcing our broader objective of maintaining fair, equitable, and responsible compensation practices globally.
- Join the UN Global Compact Business and Human Rights Accelerator and Sustainable Procurement Roundtable to align our approach further with the UNGPs, demonstrating our continued investment in building a more responsible and people-centered operations and supply chain.

## 11. APPROVAL & ATTESTATION

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For the purposes of our reporting under:

- Section 11 of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*
- Section 54 of the UK's *Modern Slavery Act 2015*
- Section 14 of Australia's *Modern Slavery Act 2018*,
- Section 5 of the *Norwegian Transparency Act (Åpenhetsloven)*

Entities reporting under specific modern slavery and transparency laws are listed in full in Appendix 12. Operations and locations covered by such laws are as follows:

- Australia: Solenis Australia Pty Ltd, Diversey Australia Pty Limited
- Canada: Solenis Canada ULC, Diversey Canada, Inc., Innovative Water Care Canada, Inc.
- Norway: Solenis Norway AS, Lilleborg AS
- United Kingdom: Solenis UK Limited, Diversey Limited, Solenis Holding Ltd

This Statement was approved on March 25, 2026, by the combined Solenis Holding Ltd Board.

The Statement has been signed by the Chief Sustainability Officer as set out in the Attestation below.

In order to prepare the statement, we consulted with the reporting entities and relevant companies we own or control. Reporting entity governing body approval is set out below.

### 11.1.1 ATTESTATION

*In accordance with the requirements of Section 11 of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, Section 54 of the UK's Modern Slavery Act 2015, Section 14 of Australia's Modern Slavery Act 2018, and Section 5 of the Norwegian Transparency Act (Åpenhetsloven), I, in the capacity of Chief Sustainability Officer, attest that I have reviewed the information contained in the report on behalf of the governing body of the entities listed in Appendix 12. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed within this report.*

Signature: /s/ Dr. Lotta Kanto Öqvist

Name: Dr. Lotta Kanto Öqvist

Position: Chief Sustainability Officer

Date: March 25, 2026.

This Report is signed by the Chief Sustainability Officer on behalf of Solenis' Board of Directors, who delegated authority to the Chief Sustainability Officer, who has the authority to bind Solenis and sign on their behalf.

### 11.1.2 AUSTRALIA

*In accordance with section 13 of the Modern Slavery Act 2018 (Cth), this Statement constitutes the modern slavery statement for the financial year ending September 30, 2025. It was approved by the Boards of Directors of each reporting entity covered by this Statement and listed in Section 12.1, in their capacity as principal governing body in March 2026.*

Solenis Australia Pty Ltd

Signature: /s/ Theodore L. Kelly

Name: Theodore L. Kelly

Position: Board of Directors

Date: March 31, 2026.

Diversey Australia Pty Limited

Signature: /s/ Deborah Walker

Name: Deborah Walker

Position: Board of Directors

Date: March 25, 2026.

### 11.1.3 CANADA

For the purposes of reporting under the Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, this Statement was approved by the Board of Solenis Holding Limited, on behalf of all Canadian reporting entities in the Solenis Group listed in Appendix 12.2, on March 25, 2026.

An attestation, as required by the Canadian Act, is detailed above.

### 11.1.4 UNITED KINGDOM

This Statement was approved by the Board of Solenis Holding Limited on behalf of the *Modern Slavery Act 2015* reporting entities listed in Appendix 12.3:

Signature: /s/ Mary Ann Sigler

Name: Mary Ann Sigler

Position: Board of Directors

Date: March 25, 2026.

### 11.1.5 NORWAY

The 2025 Modern Slavery Transparency Statement was endorsed and approved by the Board of Directors of Lilleborg AS on behalf of the reporting entities listed in Appendix 12.4 on the date: March 30, 2026.

## 12. APPENDIX – REPORTING ENTITIES

### 12.1 AUSTRALIAN REPORTING ENTITIES

Reporting Entity	ACN	Registered Address	Activities, Operations, Ownership
Solenis Australia Pty Ltd	169 325 151	1612 Centre Road, Springvale 3171 Victoria Australia	Same as registered address
Diversey Australia Pty Limited	080 527 117	Unit 8, 55-57 Newton Road Wetherill Park NSW 2164	Same as registered address

### 12.2 CANADIAN REPORTING ENTITIES

Reporting Entity	BN	Registered Address	Activities, Operations, Ownership
Solenis Canada ULC	806311437	1741 Lower Water Street, Suite 600, Halifax, Nova Scotia B3J 0J2, Canada	Address: Same as registered address Designation: Manufacturing, Sales/Marketing/Distribution
Diversey Canada, Inc.	887983773	6150 Kennedy Rd. (Unit 3) Mississauga ON L5T 2J4, Canada	Address: Same as registered address Designation: Sales/Marketing/Distribution
Innovative Water Care Canada, Inc.	873480420	Brookfield Place, Suite 2100, 181 Bay Street, P.O. Box 874, Toronto, ON, L5T 2J4, Canada	Address: Same as registered address Designation: Purchasing/procurement, sales/marketing/distribution

### 12.3 UNITED KINGDOM REPORTING ENTITIES

Reporting Entity	Company Number	Registered Address	Activities, Operations, Ownership
Solenis UK Limited	09017628	Pyramid Close, Weston Favell, Northampton, United Kingdom, NN3 8PD	Alfreton Trading Estate, Wimsey Way, Somecotes, Derbyshire
Diversey Limited	03459907	Diversey Limited Pyramid Close, Weston Favell, Northampton, United Kingdom, NN3 8PD	Diversey Limited Pyramid Close, Weston Favell, Northampton, United Kingdom, NN3 8PD
Solenis Holding Ltd		280 Bishopsgate, London, United Kingdom, EC2M 4AG	280 Bishopsgate, London, United Kingdom, EC2M 4AG

### 12.4 NORWEGIAN REPORTING ENTITIES

Reporting Entity	Org Number	Registered Address	Activities, Operations, Ownership
Solenis Norway AS	913499654	c/o Intertrust (Norway) AS, Wergelandsveien 7, 0167 Oslo, Norway	Gråterudveien 15, 3036 Drammen, Norway (Office)

Lilleborg AS

925745855

Hoffsveien 21  
0275 Oslo

Hoffsveien 21, 0275 Oslo, Norway (Office + Lab)

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## 13. APPENDIX – DISCLOSURE ALIGNMENT WITH INTERNATIONAL FRAMEWORKS

Solenis annually discloses performance data related to governance, risk management, due diligence, and compliance initiatives pertaining to human rights, child labour and forced labour. These disclosures are included in the Company's externally assured FY25 **Annual Sustainability Report**, which contains a dedicated Environmental, Social and Governance (ESG) Data Table and Global Reporting Initiative (GRI) Content Index.

We have mapped our priority sustainability topics and identified Key Performance Indicators (KPIs) to progress year over year. Alignment with international sustainability frameworks support transparency and comparability of effectiveness results. The table below provides a summary of human rights and modern slavery-related indicators disclosed in alignment with GRI standards. In parallel, Solenis also tracks performance indicators aligned with Responsible Care®, a global chemical industry framework that promotes safe chemicals management, product stewardship, and transparent engagement.

Framework Reference	Indicator Description	FY25 KPI Results
<b>GRI Standards</b>		
<b>GRI 2-25/2-26</b>	Processes to remediate negative impacts; Mechanisms for seeking advice and raising concerns	See Page 79 of our Annual Sustainability Report
<b>GRI 3-3</b>	Management of material topics	See Page 49 of our Annual Sustainability Report
<b>GRI 405-1/2</b>	Diversity of governance bodies and employees; Ratio of basic salary and remuneration of women to men	See Pages 111 and 66 of our Annual Sustainability Report
<b>GRI 406-1</b>	Incidents of discrimination and corrective actions taken	Not published externally
<b>GRI 407-1</b>	Operations and suppliers in which the right to freedom of associate and collective bargaining may be at risk	See Page 67 of our Annual Sustainability Report
<b>GRI 408-1/409-1</b>	Child labor / forced or compulsory labor, where material.	See Page 78 of our Annual Sustainability Report
<b>GRI 410-1</b>	Security personnel trained in human rights policies or procedures	Not published externally
<b>GRI 411-1</b>	Incidents of violations involving rights if indigenous peoples	Not published externally
<b>GRI 413-1</b>	Operations with local community engagement, impact assessments, and development programs	See Page 69 of our Annual Sustainability Report
<b>GRI 413-2</b>	Operations with significant actual and potential negative impacts on local communities	Nothing material to report
<b>GRI 414-1</b>	New suppliers screened using social criteria	See Page 25 of our Annual Sustainability Report
<b>GRI 414-2</b>	Negative social impacts in the supply chain	See Page 24 of our Annual Sustainability Report