

HUMAN RIGHTS *POLICY*

Policy Information

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Policy Owner: Anneleen Drieskens, CHRO Envalior



OUR COMMITMENT TO HUMAN RIGHTS

At Envalior, we are committed to upholding and promoting human rights across all aspects of our business. As a leader in the chemical industry, we understand the significant impact of our actions and are dedicated to operating responsibly and ethically.

We are guided by internationally recognized standards such as the UN Guiding Principles on Business and Human Rights, The Ten Principles of the UN Global Compact and the ILO's Fundamental Principles and Rights at Work. These frameworks help shape our approach and inform our priorities, which include:

- Ensuring safe and fair working conditions.
- Promoting transparent labor practices.
- Driving responsible and sustainable sourcing.

Recognizing the connection between human rights and environmental protection, we actively manage the environmental impact of our operations to contribute positively to communities and ecosystems.

In close cooperation with our partners, we aim to further develop due diligence processes and support a culture of respect, accountability, and integrity across our value chain.

Human rights are fundamental to our mission and essential for building trust with our stakeholders. Together, we are creating a sustainable future rooted in dignity, fairness, and shared responsibility.

Calum MacLean
CEO, Envalior

PURPOSE

At Envalior, we are committed to upholding the highest standards of human rights across our global operations, supply chain and business partners. Our strong dedication to ethical business practices is grounded in respect for the dignity, safety, and well-being of all individuals. As we become the preferred partner in sustainable and high-performance engineering materials, the rights of humans are of utmost importance.

Our approach is built to align with the fundamental principles of human rights and the core values of **the United Nations Universal Declaration of Human Rights**. As a signatory to the UN Global Compact, we reinforce our commitment to universal principles supporting human rights, labor, the environment, and anti-corruption. By adhering to this policy, our Code of Business Conduct, our Supplier Code of Conduct, and related policies, we are dedicated to upholding human rights across our operations, businesses, communities, and supply chains. We expect our employees and business partners to conduct their work with the highest standards of integrity, ethics, fairness, and respect.



SCOPE

Our [Business Code of Conduct](#) makes clear that respecting human rights, protecting nature, and supporting the safety of the communities where we operate are all key priorities throughout our operations and value chains.

"This policy is guided by international human rights standards, including the International Bill of Human Rights and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work. As we implement our commitments, we follow the principles set out in the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, while considering the specific context of our company."

This policy applies to everyone working for and with Envalor, covering its manufacturing, R&D and office facilities. It also extends to the workforce in our value chain and covers our business partners to whom our [Supplier Code of Conduct](#) applies and sets an expectation to uphold the principles herein and adopt similar policies within their own businesses.

OUR COMMITMENT

01 Health and Safety

We provide a safe and healthy workplace for all employees and contractors. We adhere to stringent health and safety standards to prevent accidents and injuries, and we continually improve our safety performance. At Envalior, we always have time to work safely, because workplace safety is our top priority. We provide safe and secure workplaces – whether in the office or on the shop floor – and it is everyone's shared responsibility to watch out for each other. Our Executive Vice President for Manufacturing and SHE Excellence drives Health and SHE initiatives to maintain high standards.

02 Non-Discrimination and Inclusion

We are committed to fostering an inclusive and respectful work environment, free from discrimination and harassment. We do not tolerate any discrimination based on any ground such as sex, race, color, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age, or sexual orientation. Envalior is committed to promoting diversity and inclusion in the workplace, recognizing that a diverse workforce drives innovation and strengthens the company.

03 Freedom of Association

We respect the right of employees to freely associate, join labor unions, and engage in collective bargaining, in accordance with local laws and regulations.

04 Fair Labor Practices

We uphold the right to fair wages, safe working conditions, and reasonable working hours. We strictly prohibit child labor, forced labor, and human trafficking in any part of our operations or supply chain. Envalior does not engage in any form of human trafficking, servitude, or modern slavery, including forced labor and child labor. Envalior Respectful hiring policy sets clear norms for hiring. Furthermore, we are committed to ensuring our employees do not work excessive hours beyond those allowed by employment regulations. Envalior supplier Code of conduct enables fair labor practices for the workforce in our value chain.

05 Data Privacy

Data protection and information security precautions are key to ensuring the trust of our employees, customers, and business partners. We're committed to complying with regional privacy regulations such as the EU's GDPR, including its principles of transparency, privacy by design, and data minimization, and with other applicable regulations. Just as we expect our customers not to infringe Envalior's intellectual property rights, we also honor the licensing and other agreements we sign with our suppliers.

06 Grievance Mechanisms

We provide accessible and transparent channels for employees, business partners, and other stakeholders to raise concerns about human rights violations. All concerns will be addressed promptly and confidentially, with no retaliation against those who report grievances in good faith.

07 Accountability and Reporting

We are committed to regularly monitoring our human rights performance. We aim towards preventing, detecting, and taking remedial actions against any human rights violations. We will report transparently on our human rights efforts and progress through our sustainability reports and other relevant communications.

08 Training and Awareness

We provide ongoing human rights training to our employees, leadership, and business partners to ensure they understand and can uphold the principles outlined in this policy.

09 Compliance with Local Laws

Wherever we operate, we comply with the local laws and regulations regarding human rights. In cases where local laws do not align with international human rights standards, we strive to uphold the higher standard. We abide with the Envalior Anti-bribery and corruption policy while performing our business and operations.

10 Policy Monitoring

Envalior will regularly review and update this policy to ensure compliance with evolving legal and ethical standards. Internal audits and assessments will be conducted to monitor adherence to this policy. Feedback from workers and stakeholders will be sought and used to improve our practices.



ADVANCING HUMAN RIGHTS THROUGH MEASURABLE IMPACT

At our organization, we are committed to upholding and advancing human rights across our operations and supply chain. We aim to provide a safe and healthy workplace for all employees and contractors, ensuring working conditions meet the highest standards of safety, dignity, and well-being. We foster a transparent and inclusive culture rooted in continuous learning, equal opportunity, and respect for every individual's contribution.

To drive accountability and progress, we review our performance against the following indicators, which focus on human rights. These include: (1) The percentage of managers who complete or acknowledge our mandatory Human Rights training, (2) The number of human rights-related grievances reported and resolved, (3) Envalior has integrated the Supplier Code of Conduct approval into our General Terms and Conditions, making it a fundamental aspect of our supplier engagement process. As such, 100% of our suppliers agree to and adhere to the Envalior Supplier Code of Conduct.

We set ambitious targets to ensure that (70%) of relevant* employees complete awareness training on Human Rights, >90% of our employees sign the Envalior Code of Conduct.

These efforts reflect our broader commitment to embedding human rights into every aspect of our business and fostering a culture where all individuals are valued and protected.



HUMAN RIGHTS DUE DILIGENCE

We align our due diligence processes with the United Nations Guiding Principles on Business and Human Rights. We have a responsibility to prevent, mitigate, and address adverse impacts.

We take a holistic, comprehensive, risk-based approach to Human Rights due diligence. We adopt a process, aligned with international legislative requirements, that includes identification of impacts and emerging risks, addressing our findings & act (prevent, detect and react). We track the effectiveness of our actions and communicate progress transparently. We uphold trusted two-way dialogue with our stakeholders on how we address impacts, to better understand different perspectives and intervene openly on critical issues.






COLLABORATING TO UPHOLD HUMAN RIGHTS

Human rights are a shared responsibility that requires collective action. We actively collaborate with diverse internal and external stakeholders, including governments, NGOs, employees, suppliers, customers, experts, and local communities. Together, we exchange insights, create influence, and take meaningful action to protect human rights wherever they may be at risk.

We recognize the invaluable role human rights defenders play in spotlighting issues that might otherwise remain unnoticed. We are committed to working alongside our stakeholders to support and protect their freedom, ensuring their voices are heard and their efforts are safeguarded.

GRIEVANCE MECHANISM

Our Speak Up framework serves as a secure and accessible reporting channel for employees and external stakeholders to raise concerns about potential violations of our Code of Business Conduct (CoBC), policies, or applicable laws. By offering a platform for open dialogue, we ensure transparency and accountability across our operations.

To learn more about our Speak Up framework and how to report concerns, please [visit our website](#) .

CONTACT

Questions and feedback regarding this policy can be submitted to Anneleen Drieskens, CHRO Envalior