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Policy number:	SL-POL-010.001	Revision number:	N/A
Original effective date:	Jan. 16, 2024	Pages:	
Revised effective date:	N/A	Reviewed date:	Jan. 16, 2024

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## **SOLENIS POLICY**

### **Marketing Claims**

#### **1.0 Policy**

Solenis will conduct business in a sustainable and ethical manner, including the way we market and advertise our products and solutions. Claims regarding our products and solutions will be truthful, accurate, verifiable, and supported by proper documentation.

#### **1.1 Objective**

To outline our commitment to truth in advertisements, marketing claims, and public communications. The policy will outline roles and responsibilities to ensure accurate marketing claims and will emphasize the importance of complying with all relevant regulations and any internal process and procedures. This applies to claims on marketing documentation and presentations as well as product labels.

#### **1.2 Our promise**

Solenis is committed to:

- Complying with all relevant marketing claim regulations, and
- Making truthful, specific, accurate, and verifiable marketing claims

Our environmental efforts support the sustainable sourcing, production, use and disposal of all Solenis products. We work to integrate sustainability practices in our business and are committed to operating our global facilities and businesses in accordance with the principles of [Responsible Care](#)<sup>\*</sup>. Solenis' commitments to the environment, Responsible Care, health, safety and security are outlined in our [Responsible Care policy, SL-POL-005.000](#). Each worker is expected to promote these goals in his or her tasks. All employees are expected to use Solenis resources in a responsible manner to eliminate waste.

#### **2.0 Commitments**

##### **2.1 Compliance**

Truth in marketing claims is a regulated requirement in some countries. For instance, the United States Federal Trade Commission enforces its "Green Guides," which outline how organizations can make legal marketing claims on products sold in the U.S. In Europe, EU Member States are implementing the EU Commission's "Proposal for a Directive Empowering Consumers for the Green Transition," also known as the "Greenwashing or Green Claims Directive." EU's Green Claims Directive will address greenwashing concerns of companies misleading EU consumers

over environmental claims. Companies will need to substantiate environmental claims using life cycle assessment, communicate them accurately and holistically, and have them externally verified. Other non-EU member states environmental claims are subject to local consumer protection laws and advertising rules, e.g. the UK's Consumer Protection from Unfair Trading Regulations 2008 (CPRs) and the Competition & Markets Authority (CMA) Green Claims Code (2021).

Solenis is committed to adhering to all relevant regulations and codes in the markets where we sell products. Solenis employees who are responsible for drafting and approving marketing claims are expected to be familiar with the relevant rules and regulations in their region.

## 2.2 Claim Guidelines

Marketing claims made by Solenis are expected to follow the following concepts:

**2.2.a Accurate.** Claims are expected to be truthful and not misleading.

**2.2.b Specific.** Claims should be focused on clearly defined attributes of the product or solution. For instance, a claim like “Environmentally Preferable” is not acceptable in the absence of additional data or support to define exactly what is meant.

**2.2.c Substantiated and Evidenced.** Claims must be supported with appropriate documentation to provide traceable verification. Data to support the claim should be provided with the claim if possible. Claims that are difficult to substantiate need supporting documentation. All data and documentation needs to be stored at a central database supported by the business unit and maintained for 10 years.

**2.2.d Relevant.** Claims should be relevant to the product or solution. For instance, claims such as “Chlorine Free” may not be appropriate if the product category never contains chlorine.

**2.2.e Transparent.** Claims should not hide material facts associated with the product or solution. Tradeoffs associated with the product or solution should be made clear.

## 2.3 Roles and Responsibilities

Solenis employees responsible for drafting or approving product labels, brochures, public communications or marketing claims shall be familiar with the relevant regulations pertaining to responsible marketing claims. Solenis employees responsible for approving and publishing these materials shall ensure the claims are compliant with the regulations and the guidelines outlined in this policy. Product Regulatory has the added responsibility to validate certain green claims.

## 2.4 Validation

Certain marketing claims have been identified by regulatory agencies to be potentially associated with greenwashing. These terms can be found in the Green Claims Annex, available to Solenis employees in the Product Regulatory section of the company intranet, and use of those claims must be specifically approved by the Product Regulatory team.

### 3.0 Use and maintenance of this policy

This policy will be communicated to all employees and made available at all Solenis sites. The Product Regulatory department and Corporate Sustainability team will review this policy on a timely basis, at least once per year. Updates will be made to ensure the policy reflects best practices for sustainability. Any violation of this policy should be reported to management, through our “Share Your Concerns” channels or via email to [ethicsandcompliance@solenis.com](mailto:ethicsandcompliance@solenis.com).

### 4.0 Scope

This policy covers all Solenis employees, businesses, subsidiaries, offices, warehouses, manufacturing facilities and operations globally. Solenis businesses in regions that may not have regulations focused on marketing claims are still expected to adhere to the guidelines outlined in this Policy.

### 5.0 Owner

Chief Sustainability Officer.

### 6.0 Exceptions

There are no exceptions to this policy.

### Revision history

This is a history of notable changes to this policy.

Effective date	Section	Description of change