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SOLENIS POLICY Reporting

1.0 Policy

Solenis is committed to growing based on a core-value foundation of integrity, respect and accountability. The cornerstone of this foundation is our [Global Standards of Business Conduct](#).

Success at Solenis depends on our steadfast focus on creating a Deliberate EthicsSM Culture. Deliberate Ethics is a mindset of being intentional about driving and maintaining a high-performance culture while staying true to our core values and keeping the Global Standards of Business Conduct top of mind. Solenis' Deliberate Ethics Culture helps ensure the company and its employees continue to adhere to honest and fair dealings with our customers, communities, fellow employees, suppliers and investors.

Reporting on or sharing concerns regarding suspected or known misconduct or violations of the applicable laws or the Global Standards of Business Conduct and supporting policies or procedures is the key element of Deliberate Ethics Culture.

The purpose of this policy is to reinforce Deliberate Ethics Culture by providing a safe and reliable means for Solenis employees and others to report concerns they may have about conduct impacting Solenis. By following this policy, Solenis employees can raise concerns, confidentially and anonymously, if desired, and free of any retaliation, discrimination or harassment.

2.0 Definitions and abbreviations

Concern – any information related to actions, practices or process irregularities, suspected or known to be in violation of Solenis Global Standards of Business Conduct, supporting policies and procedures and/or applicable laws.

OEC – Solenis' Office of Ethics and Compliance.

Reporter – any individual, whether or not a Solenis employee, who shares a Concern.

3.0 Responsibility to report

Each Solenis employee has the responsibility to report or share in good faith any Concerns, including Concerns about actual or suspected violations of Solenis Global Standards of Business Conduct, Solenis policies and procedures or any laws or regulation governing Solenis operations.

Appropriate subjects to report under this policy include but are not limited to financial improprieties, accounting or audit matters, ethical violations or other similar illegal or improper practices, including but not limited to:

- Harassment or discrimination
- Fraud
- Theft
- Bribery or kickbacks
- Misuse of company assets
- Conflicts of interest.

4.0 Good-faith reporting

A Solenis employee sharing a Concern must act in good faith in believing the information disclosed or shared indicates a violation of ethical standards. Any unfounded allegation that proves to have been made maliciously, recklessly or knowingly to be false may be viewed as a serious offense and result in a disciplinary action, up to and including termination of employment.

5.0 How to report or share a Concern

All Concerns should be reported as soon as practicable and consistent with this policy:

- **Certification of compliance with the Global Standards of Business Conduct:**
Each Solenis employee has the obligation to share or report any Concerns during the annual company-wide Global Standards of Business Conduct certification process.
- **Solenis managers and directors, representatives of the Human Resources, the Legal department or the Office of Ethics and Compliance:**
When appropriate, a Concern can be shared by discussing the situation with a manager, who must then convey the relevant information to the Human Resources, Legal department or the OEC for further consideration. A Concern can also be shared directly with the Human Resources, the Legal department or the Office of Ethics and Compliance.
- **Confidential reporting system:**
Reporters may submit a Concern in writing by:
 - (i) clicking the “Share Your Concern” link on Solenis’ InSite intranet home page; and
 - (ii) after being redirected to the “Share Your Concern” page, by clicking on the interactive “Submit a report or share a concern by webmail” button, which will then take Reporters to the reporting portal (“Lighthouse”).

Lighthouse will guide Reporters through the necessary submission steps and give Reporters an option to remain anonymous. Lighthouse will also allow Reporters to follow up on any of the previously submitted Concerns, while preserving Reporters’ anonymity.

Reporters may also share a Concern by telephone. The “Share Your Concern” page provides the necessary details:

- (i) For calls in the U.S. and Canada, Reporters can use the following toll-free number: +1 833 203 3981;
- (ii) For calls from other countries, Reporters can use the list of access codes provided on the “Share Your Concern” page and also listed below in [Annex 1](#) to this policy. As with the sharing of Concerns by webmail, the telephone option also allows Reporters to remain anonymous.

Should a Reporter choose to reveal his or her identity, Solenis will take the necessary steps to protect the Reporter’s identity and keep the substance of the reported Concern confidential to the extent it is consistent with the need to conduct an adequate investigation.

Solenis protects Reporters from any form of retaliation for sharing Concerns.

6.0 Ask an ethics and compliance question

OEC encourages any Solenis employee who is unsure if misconduct or violation has occurred or does not believe that reporting a Concern is warranted, to ask the OEC a question.

A Solenis employee can ask a question by following the “Share Your Concern” link on the Solenis InSite home page and, when on the “Share Your Concern” page, by clicking the button “Ask an Ethics and Compliance Question.”

As with reporting or sharing a Concern, Solenis shall take reasonable steps to protect the identity of the employee asking a question, unless the employee specifically waives confidentiality of the communication.

7.0 Response to a reported Concern

Anyone who becomes aware of a Concern must promptly notify their manager or any representative of the Human Resources Department, the Legal Department or the OEC. The OEC will acknowledge receipt of the Concern, unless the Concern was submitted anonymously or no return address or contact details are provided.

The OEC shall conduct a prompt, discreet and objective review or investigation based on the shared Concern. Any investigation shall be conducted in accordance with Solenis’ [Investigations policy \(SL-POL 004.003\)](#). A full investigation may not be possible if a Concern conveyed anonymously is vague or general.

At its own discretion and subject to legal and/or other constraints, the OEC may share with the Reporter the information about the outcome of an investigation.

8.0 No retaliation

A Reporter who in good faith reports or shares a Concern or participates in a review or investigation of a Concern shall not be subject to harassment, retaliation or adverse employment



consequences because of such participation. This protection extends to individuals who report in good faith, even if the allegations are not substantiated.

Any individual who retaliates against someone who in good faith has shared a Concern or participated in a review or investigation of a Concern will be subject to discipline, up to and including termination of employment.

Anyone who believes that an individual has been subject to harassment, retaliation or adverse employment consequences as a result of making a good faith report or participating in a review or investigation of a Concern should contact the OEC: ethicsandcompliance@solenis.com.

9.0 Policy violations

Violation of any of the requirements under this policy may result in disciplinary action, including employment termination.

10.0 Training and communication

Training on this policy will be provided as necessary.

11.0 Other relevant policies and protocols

- [Global Standards of Business Conduct](#);
- [Investigations policy \(SL-POL 004.003\)](#).

12.0 Owner

Solenis' general counsel is responsible for implementation of, and amendments to, this policy.

13.0 Exceptions

There are no exceptions to this policy.

14.0 Scope

This policy applies to Solenis, its commercial units and majority-owned or controlled subsidiaries.



Annex 1 to Solenis' Policy on Reporting (SL-POL-004.013)

Share Your Concern by telephone by following the 3 steps below

Step 1: call to the "access code" number of your country. If you do not find your country, click [here](#).

Country	Access code
Argentina (+54)	0800-555-4288 / 0800-222-1288
Australia (+61)	1-800-551-155 / 1-800-881-011
Austria (+43)	0-800-200-288
Belarus (+375)	8^800-101
Belgium (+32)	0-800-100-10
Brasil (+55)	0800-890-0288 / 0800-888-8288
Canada (+1)	833 203 3981
Chile (+56)	800-225-288 / 800-360-311 / 800-800-288
China (+86)	108-888 (North, Beijing CNGC) / 10-811 (South, Shanghai; China Telecom)
Colombia (+57)	01-800-911-0010 / 01-800-911-0011
Denmark (+45)	800-100-10
Estonia (+372)	800-12001
France (+33)	0-800-99-1011 / 0-800-99-1111 / 0-800-99-1211 / 0-800-99-0111 (Paris only) / 0-800-99-0011 / 0805-701-288
Germany (+49)	0-800-225-5288
Iceland (+354)	00-800-222-552-88
India (+91)	000-117
Indonesia (+62)	001-801-10
Italy (+39)	800-172-444
Japan (+81)	00-663-5111
Korea (+82)	00-369-11
Latvia (+371)	8000-2288
Luxembourg (+352)	800-201-11
Mexico (+52)	800-288-2871 / 800-112-2020 / 800-288-2872
Netherlands (+31)	0800-022-9111
New Zealand (+64)	000-911
Norway (+47)	800-190-11
Peru (+51)	0800-50-000 / 0800-50-288

Poland (+48)	0-0-800-111-1111
Portugal (+351)	800-800-128
Russia (+7)	8^10-800-110-1011 / 363-2400 (Moscow) / 363-2400 (St. Petesburg)
Singapore (+65)	800-011-1111, 800-001-0001
South Africa (+27)	0-800-99-0123
Spain (+34)	900-99-0011
Sweden (+46)	020-799-111
Switzerland (+41)	0-800-890011
Taiwan (+886)	00-801-102-880
Turkey (+90)	0811-288-0001
United Kingdom (+44)	0-800-89-0011
United States (+1)	833 203 3981

Step 2: type the toll-free code: 800-603-2869.

Step 3: choose your preferred language.

Language	Code
English	1
Spanish	2
French	3
Mandarin; Cantonese	4
German	5
Italian	6
Portuguese	7
Japanese	8
Arabic	9

Language	Code
Hungarian	01
Polish	02
Dutch	03
Czech	04
Taiwanese	05
Korean	06
Tagalog	07
Vietnamese	08
Indonesian	09

Language	Code
Finnish	001
Russian	002
Hindi	003
Hebrew	004
Turkish	005
Thai	006
Burmese	0001
Other	000