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Policy number:	SL-POL-004.013	Revision number:	3
Original effective date:	April 3, 2020	Pages:	4
Revised effective date:	Nov. 28, 2022	Reviewed date:	July 11, 2023

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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 Ethics<sup>SM</sup> Culture. Deliberate Ethics is a mind-set 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 matter related to suspected or know misconduct or violations of the applicable laws or Solenis Global Standards of Business Conduct and supporting policies and procedures.

**OEC** – Solenis' Office of Ethics and Compliance.

**Reporter** – any individual, whether or not a Solenis employee, who shares a Concern with the OEC.

#### **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, such as:

- Fraud.
- Theft.
- Harassment.
- Bribery or kickbacks.
- Misuse of company assets.
- Undisclosed conflicts of interest.

#### 4.0 Good-faith reporting

A Reporter sharing a Concern must act in good faith and have reasonable grounds for believing the information disclosed or shared indicates a violation of law and/or ethical standards. Any unfounded allegation that proves to have been made maliciously, recklessly or knowingly to be false will be viewed as a serious offense and result in 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. There are a number of ways a Reporter can share his or her Concern.

- A Solenis employee has the obligation to share or report any Concerns during the annual companywide Global Standards of Business Conduct certification process.
- When appropriate, a Concern can be shared by discussing the situation with a manager, who may then convey the relevant information to the OEC for further consideration.
- A Concern can be shared with one of Solenis' Deliberate Ethics Ambassadors.

Solenis encourages anyone reporting or sharing a Concern to identify himself or herself, in order to facilitate the investigation of the Concern. However, Concerns may be submitted on a **confidential and / or anonymous basis**. Solenis shall take reasonable steps to protect the identity of a Reporter and shall keep reports of Concerns confidential to the extent possible, consistent with the need to conduct an adequate investigation.

If a Reporter wishes to remain anonymous, Solenis maintains a dedicated Share Your Concern page that offers anonymous reporting and follow-up channels. Accordingly, a Reporter can share a Concern by:

- **Submitting an incident report** through the confidential **Lighthouse** reporting system that can be accessed by following "Share Your Concern" link on Solenis InSite landing page and, when on the "Share Your Concern" page, by clicking the button "Submit a report or share your concern by webmail." Lighthouse will guide a Reporter through the necessary submission steps and give the Reporter an option to remain anonymous. Lighthouse also allows Reporters to follow up on previously submitted reports, while preserving their anonymity.
- **Submitting a report or sharing a Concern by telephone** using dedicated telephone numbers provided on the Share Your Concern line.



For calls in the U.S. and Canada, Reporters can use the following toll-free number:  
**+1 833 203 3981.**

For calls outside the U.S. and Canada, Reporters can use the list of access codes provided on the “Share Your Concern” page and also listed in [Annex 1](#) to this [policy](#). As with the sharing a Concern by webmail, the call-in option also allows Reporters to remain anonymous.

## **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 an ethics and compliance question.

A Solenis employee can ask a question by following “Share Your Concern” link on Solenis InSite landing page and, when on “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 or shared concern**

Anyone who receives a report of a Concern must promptly notify the OEC of such report in writing. The OEC shall notify the Reporter and acknowledge receipt of each reported or shared Concern, unless the report 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 reported or shared Concern. Any such investigation shall be conducted in accordance with Solenis’ Investigations policy. A full investigation may not be possible if a report made anonymously is vague or general.

At its own discretion and subject to legal and 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, in the case of an employee, adverse employment consequences because of such report or participation. This protection extends to individuals who report in good faith, even if the allegations are, after an investigation, not substantiated.

Any individual who retaliates against someone who in good faith has reported 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](mailto: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 UK Industries Limited, its commercial units and majority-owned or controlled subsidiaries.

## Revision history

This is a history of notable changes to this policy.

Effective date	Section	Description of change
April 3, 2020	Throughout	This replaces the previous Whistleblower and Non-retaliation policies in their entirety.
Feb. 12, 2021	Throughout	Reviewed; company name updated.
Nov. 28, 2022	5.0	Replaced Lighthouse toll-free number.