

Human Rights Policy

Summary

This Policy provides the framework for upholding human rights across all Elementis operations. Employees, contractors, and business partners must familiarise themselves with the Policy's principles, understand their responsibilities, and comply with training requirements. Key focus areas include identifying risks, promoting inclusivity, and reporting any concerns regarding potential violations.

Scope: This global policy applies to all employees, contractors, suppliers, and third parties working on behalf of Elementis.

Core Commitments:

- Prohibition of child and forced labour
- Promotion of non-discrimination and equal opportunity
- Respect for freedom of association and collective bargaining
- Ensuring health, safety, and well-being
- Upholding privacy and data protection
- Engaging respectfully with local communities

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1. Purpose and Commitment

Elementis is dedicated to conducting its business with integrity and respect for human rights, guided by international standards such as the United Nations (UN) Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) Core Labour Standards, and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. This policy reaffirms our commitment to uphold and promote human rights across our operations and value chain. We aim to uphold human dignity and equality by embedding human rights into our operations, supply chain, and interactions with stakeholders. Through transparency and accountability, we ensure that respect for human rights underpins all decision-making processes.

2. Our Values

At Elementis, our values guide our business, determine our success, and shape our culture. They are at the core of every decision we make. Our values are:

- Safety: Our Way of Life - We are committed to providing a safe environment for all.
- Solutions: Creating Value for Our Customers - We make a difference through our expertise, responsiveness, and focus on quality.
- Ambition: Passion for Excellence - We are innovative, courageous, and driven in everything we do.
- Respect: We Do the Right Thing - We care for our colleagues, customers, communities, and environment.
- Team: The Power of Collaboration - We work, grow, and succeed together.

3. Who does this Policy apply to?

This policy applies to all Elementis employees, contractors, suppliers, and third parties working on behalf of the company. It underpins our Code of Conduct and Ethics, ensuring that respect for human rights is integral to our culture and decision-making.

4. Key Principles

I. Prohibition of Child and Forced Labour

- Elementis prohibits all forms of child labour and forced labour.
- Employment decisions comply with applicable local laws, and the minimum employment age aligns with ILO standards.
- No worker will be subjected to involuntary labour through coercion, threats, or exploitation.

II. Non-Discrimination and Equal Opportunity

- We are committed to creating an inclusive workplace free from discrimination based on race, color, gender, religion, sexual orientation, disability, or any other protected characteristic.

- o Employment practices, including recruitment, promotion, and compensation, are based solely on merit, qualifications, and business needs.

III. *Freedom of Association and Collective Bargaining*

- o Elementis respects employees' rights to form or join trade unions and engage in collective bargaining.
- o We promote open communication and constructive dialogue with employee representatives.

IV. *Health, Safety, and Well-being*

- o We prioritize the safety and well-being of our workforce through stringent health and safety measures, including the TogetherSAFE Program and adherence to Life-Saving Rules.
- o All sites implement comprehensive safety training and empower employees to report unsafe conditions without fear of retaliation.

V. *Privacy and Data Protection*

- o We uphold employees' and customers' rights to privacy by maintaining high standards of data protection and ensuring responsible use, storage, and sharing of personal information.

VI. *Local Community Engagement*

- o Elementis respects the rights of local communities.
- o Site operations consider social and environmental factors to minimize environmental impacts, reduce emissions, use resources efficiently, and promote sustainable practices.

5. Due Diligence Process

I. *Risk Identification and Mitigation*

- o Employ a human rights risk assessment, on our value chain, prioritizing high-risk regions and sectors.
- o Incorporate the results into the corporate strategy, addressing gaps proactively.

II. *Supply Chain Responsibility*

- o Use a multi-layered risk management framework:
- o Supplier self-assessments and declarations.
- o On-site audits focusing on compliance with human rights planned.
- o Escalation procedures for identified violations, including remediation plans or termination of contracts.

6. Responsibilities

Employees and Contractors: Understand and adhere to this policy and report any concerns or violations.

Suppliers and Business Partners: Comply with Elementis's Supplier Code of Conduct, which incorporates this policy, ensuring human rights are respected throughout the supply chain.

Leadership: Lead by example and ensure teams are trained on human rights-related topics. Foster an inclusive and respectful culture aligned with Elementis values.

7. Reporting Concerns

Employees and third parties are encouraged to report suspected violations of this policy through the IntegrityCounts Speak Up Line, which guarantees confidentiality and non-retaliation.

Resources at Your Disposal

You can always speak to your manager, HR, Finance, or Legal & Compliance (compliance@elementis.com) if you have questions or concerns. For confidential and anonymous reporting, our IntegrityCounts Speak Up Line is available 24/7:

Phone (check your country’s number below)

Online: <https://integrity-counts.com/org/elementis/>

Email: elementis@integrity-counts.com

Country-Specific Speak Up Line Numbers:

Brazil	0-800-761-1959	India	000-8001007980	UK	0-800-092-3586
China	400-120-8514	Malaysia	0060 154-877 1090	US	1-866-921-6714
Finland	0 800 915 702	Netherlands	00-800-2002-0033	Portugal	00351-308-801-038
Germany	0-8001806718	Taiwan	00-800-2002-0033		

Zero Tolerance for Retaliation

Elementis stands by those who raise concerns in good faith. Retaliation is not tolerated, and we are committed to protecting you if you Speak Up. Together, we’re creating a safe, fair, and transparent workplace.

8. Implementation and Oversight

Elementis integrates human rights considerations into its risk management, supplier evaluations, and employee training programs. The compliance team, supported by leadership, ensures adherence and regular policy reviews.

Continuous Improvement

We engage with stakeholders and industry initiatives to continuously improve our human rights practices, keeping pace with evolving standards and expectations. Some examples are:

- Embed human rights education into employee training, covering emerging risks like AI ethics and evolving labour challenges.
- Conduct annual reviews of the policy to ensure alignment with global developments and stakeholder expectations.

9. AI & Ethics

Elementis is committed to the ethical and responsible use of AI technologies. We recognize the potential impact of AI on human rights and are dedicated to ensuring that AI applications are deployed in a manner which respects and promotes these rights. We adhere to the principles of transparency, accountability and fairness in all AI-related activities and are committed to preventing biases, ensuring data privacy and security, and avoiding the use of AI that could result in discrimination or harm.

10. Conclusion

At Elementis, we are committed to creating a workplace where human rights are respected and upheld. By embedding these principles into our daily operations, we foster a culture of integrity, respect, and continuous improvement. Together, we can build a more inclusive, fair, and sustainable future for all. Let us all contribute to making Elementis a place where everyone feels valued and empowered to make a difference.

Our values of Safety, Solutions, Ambition, Respect, and Team are the foundation of our commitment to human rights. They guide us in every decision we make and ensure that we uphold the highest standards of ethical conduct in all our interactions.