



## Forced Labour and Child Labour Report for Solvay

This report is made in compliance with Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act") by Solvay Chemicals, Inc. ("**Solvay Chemicals**") and American Soda LLC ("**American Soda**") (collectively, "**we**").

This report has been prepared for the calendar year ended December 31, 2024.

Solvay Chemical's board of directors and American Soda's board of managers, as the respective principal governing bodies, approved the report pursuant to section 11(5) of the Act on May 13, 2025.

### Who We Are: Activities and Structure

Solvay Chemicals and American Soda, as part of the Solvay group, are committed to responding to the growing demand for more sustainable products. Responsible business is at the core of our values and culture.

Solvay Chemicals offers leading, sustainable solutions through our production of essential chemicals used across multiple markets. Our scientific experience allows us to offer state-of-the-art solutions and promote sustainable development in markets including agriculture, automotive, building and construction, consumer goods and healthcare, electronics, industrial manufacturing, and the resources, energy, and environment sectors.

American Soda is a leader in sodium carbonate (soda ash) production. We engage two different processes in production: the traditional ammonia process and refining a primary source of sodium carbonate, allowing us to offer both natural and synthetic soda ash. We maintain a unique, global network through our international plants and sales offices.

### Our Supply Chains

Solvay Chemicals and American Soda maintain complex, international supply chains to efficiently serve our global client base. Given our global reach, we understand the risk of forced labour and child labour in supply chains and as such, have developed policies and monitoring processes to mitigate the risk of such practices throughout our supply chain.

As Solvay entities, we are committed to reaching our sustainability goals, which requires working together with our supply chain. We have thus developed an ESG risk management approach to address human rights and environmental impacts across our supply chain.

At the parent level, Solvay has identified 174 suppliers as "core" suppliers. 96% of those suppliers are covered by a third-party sustainability assessment.

## How We Work to Ensure Our Supply Chains Are Free of Forced Labour and Child Labour

Compliance, integrity, and business ethics are a business imperative for Solvay entities. With sustainability as one of our core values, we are committed to protecting human rights and the environment throughout our operations. To achieve our business goals, Solvay has implemented stringent policies and procedures relating to human rights and the environment that apply throughout the group.

### 1. Our Policies

#### *Code of Business Integrity*

Solvay's Code of Business Integrity applies to all employees of all two reporting entities, and third parties acting on our behalf. The Code of Business Integrity reflects our commitment to responsibility, integrity, and ethical conduct throughout our operations. The following are key components of our Code of Business Integrity:

- **Ethics and Integrity in Society:** We are committed to protecting human rights and upholding internationally recognized standards, such as those in the UN Universal Declaration of Human Rights and UN Guiding Principles on Business and Human Rights. This includes a strict prohibition against employing people against their will and any and all forms of exploitation of children. Solvay adheres to the legal minimum age requirements as outlined in the ILO conventions and ensures working hours and remuneration comply with applicable laws. We expect our business partners to apply equivalent principles.
- **Ethics and Integrity in the Workplace:** Solvay maintains workplaces that are free from harassment and discrimination, and where inclusion and diversity play a critical role. We are committed to high safety standards and continuous improvement of our safety standards. Part of this commitment involves ensuring safe and healthy working conditions on all Solvay sites for employees and contractors.
- **Ethics and Integrity in Business:** All Solvay entities are committed to conducting business in an ethical, fair, and honest way. We strictly prohibit corruption of any form within our operations.

#### *Supplier Code of Business Integrity*

Solvay also maintains a Supplier Code of Business Integrity to ensure we work with suppliers who are aligned with our values. The Supplier Code of Business Integrity applies to all suppliers of goods or services, and all of the suppliers' subcontractors. We pride ourselves on partnerships built on transparency, collaboration, and innovation. The Supplier Code of Business Integrity promotes these values within our partnerships, which emphasize our commitments to economic, societal, and environmental sustainability.

The Supplier Code of Business Integrity requires that suppliers comply with all applicable laws and regulations and conduct business in an ethical manner. We explicitly prohibit suppliers from engaging in any form of forced or compulsory labour and child labour. We encourage suppliers to hold themselves to

the highest standards of human rights protections, including by respecting personal dignity, privacy, and rights of employees, and by complying with applicable laws pertaining to working hours, employee compensation, and freedom of association. The Supplier Code of Business Integrity obliges suppliers to cooperate in ensuring Solvay responsibly sources minerals.

Solvay's suppliers are required to communicate the contents of the Supplier Code of Business Integrity to all employees and subcontractors and are responsible for ensuring compliance. In addition, the Supplier Code of Business Integrity forms part of our sourcing process and purchasing contracts.

### ***Human Rights in Business Policy***

Solvay's Human Rights in Business Policy reflects our commitment to respecting human rights and to act with due diligence to avoid infringing human rights. The policy expressly outlines the prohibition against child labour and forced labour as being most pertinent in our operations and within our supply chain. The Human Rights in Business Policy is applicable to all Solvay employees and business partners, including suppliers, customers, contractors, agents, and other representatives.

Under the Human Rights in Business Policy, Solvay commits to upholding internationally recognized human rights standards, including the ILO's core labour conventions and the Convention on the Rights of the Child. We also adhere to the standards expected of companies outlined in the following:

- The United Nations (UN) Global Compact;
- The ILO Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy;
- The OECD Guidelines for Multinational Enterprises;
- The UN Guiding Principles on Business and Human Rights; and
- The Children's Rights and Business Principles.

### ***Responsible Supply Chain Policy***

Solvay's Responsible Supply Chain Policy applies to all purchased goods and services, and our entire supplier base. It reflects Solvay's commitment to adhering to high standards of legal compliance, business ethics, and integrity. Under the Statement, we expect suppliers to:

- Promote and respect fundamental human rights, including by avoiding child labour, forced or trafficked labour, and other unfair working conditions;
- Conduct business in accordance with all applicable laws;
- Maintain a safe and healthy working environment;
- Operate sustainably;
- Comply with all applicable disclosure requirements;

We expect that all suppliers will adopt a similar standard within their own supply management system, and work with suppliers who respect the same principles of sustainability and responsibility as we do.

## 2. Our Due Diligence Processes

We do not tolerate violations of the Code of Business Integrity or related policies. Solvay maintains a Speak Up policy to raise concerns based on the Code of Business Integrity. There are multiple ways for employees to voice concerns, including to a manager or supervisor, HR, the Legal Department, a regional Compliance Officer, any member of the Internal Audit Department, or the employees' representative. We also maintain an Ethics Helpline which is operated by a private third party. Confidentiality is guarded however the employee chooses to report, and retaliation for good faith reporting is strictly prohibited.

Where we determine the Code of Business Integrity has been violated, there may be disciplinary actions, up to and including termination.

Solvay's Supplier Code of Business Integrity reinforces our commitment to sustainability within our operations, including throughout the upstream supply chain. As part of this commitment, Solvay may request that suppliers perform a third-party sustainability assessment or sustainability audit. We assess our suppliers on corporate social responsibility grounds through third-party assessments of critical suppliers by Ecovadis.

Under Solvay's Supplier Code of Business Integrity, suppliers are required to have in place a reporting mechanism whereby employees can report behaviours that would violate any of the requirements of the Supplier Code of Business Integrity. Where suppliers do not have internal reporting mechanisms, suppliers' employees may always report under Solvay's Speak Up hotline.

Solvay is also a founding member of Together for Sustainability, a global, procurement-driven initiative that we use to assess and improve the sustainability of chemical companies and their suppliers. Through the program, we share supplier evaluations among members to promote de facto sustainability standards for the chemical supply chain.

Solvay met its commitment to the United Nations Living Wage initiative a year early regarding our global workforce. The outcome of this assessment confirms that all Solvay employees worldwide are compensated in accordance with or exceeding recognized living wage standards. This ensures every Solvay employee earns enough to live with dignity and security, covering fundamental family expenses for housing, food, healthcare and education. Solvay is committed to upholding this standard and reviewing it periodically.

We maintain annual, mandatory training and certification to ensure all Solvay employees know our Code of Business Integrity. The 2025 version of the mandatory Code of Business Integrity training, which was also extended to externals and service providers who work with a Solvay e-mail, incorporates a specific Human Rights module. This module includes, but is not limited to, the risks relating to forced labour and child labour in our internal operations and supply chains, creating awareness on the participants on how to identify potential signs of forced and child labor, inadequate working conditions and other human rights issues, and understand how to respond accordingly.

### **3. How We Monitor Ourselves and Our Suppliers and Assess Effectiveness**

To assess human rights risks across our upstream supply chain, Solvay has developed an ESG risk management approach that allows us to identify risks and assess the severity of risks in more than 60 upstream supply chains. We use a third-party risk management platform for adverse media screening or risks particularly relating to modern slavery and human rights, including forced labour and child labour.

Additionally, in 2024, Solvay participated in the EcoVadis assessment, a globally recognized platform that evaluates the sustainability performance of companies, helping them manage ESG risks and improve their sustainability practices. Solvay achieved an overall score of 78/100, improving by 7 points compared to 2023, with a score of 80/100 in the Labor & Human Rights category. Additionally, Solvay achieved a remarkable score of 90/100 in Sustainable Procurement. These results highlight Solvay's ongoing commitment to ethical labor practices and the protection of human rights, demonstrating progress and dedication to creating a fair and safe working environment throughout our value chain, ensuring sustainability and ethical practices are upheld at every stage.

Solvay also maintains a 24/7 Ethics Helpline through which any stakeholder, including employees, suppliers, and third parties, may file reports relating to human rights violations. Importantly, employees of suppliers may also use the Helpline. "Human rights violations" under the Ethics Helpline specifically relates to, but is not limited to, forced labour, child labour, human trafficking, and abuse of immigrant workers or undocumented migrants. Every report submitted under the Ethics Helpline is reviewed by the Ethics & Compliance team.

Solvay has an independent department, under the direction of the Chief Compliance Officer, that monitors the deployment of the Code of Business Integrity and Ethics & Compliance program. The department also investigates any reports raised under our Speak Up policy.

Solvay's Chief Compliance Officer reports to our General Counsel. Annually, the Chief Compliance Officer will provide a report of all non-compliance incidence relating to the Code of Business Integrity and related policies to the Business Ethics & Compliance Board (which is integrated by selected Executive Committee's members) and Board of Directors Audit & Risk Committee.


### **How We Have Addressed Reported Risks or Use of Forced Labour or Child Labour in our Supply Chains**

As of December 31, 2024, neither Solvay Chemicals nor American Soda have encountered situations of forced labour or child labour in our supply chains. We therefore have not had to remediate such situations.


## Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Name: Carolyn Fonte  
Title: Treasurer  
Date: May 14, 2025

Signed by:  
  
D925041BFE734E7...  
I have the authority to bind Solvay Chemicals, Inc.

Name: Carolyn Fonte  
Title: Treasurer  
Date: May 14, 2025

Signed by:  
  
D925041BFE734E7...  
I have the authority to bind American Soda LLC.