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HUMAN RIGHTS POLICY

Purpose

At Arkem Chemicals B.V., respect for human rights is a fundamental value and an integral part of how we conduct business. This Policy sets out our commitment to respecting internationally recognized human rights throughout our operations and business relationships and establishes the principles that guide our activities.

Scope

This Policy applies to all employees, directors, officers, temporary workers, contractors and any third parties acting on behalf of Arkem Chemicals B.V. We also expect our suppliers, contractors and other business partners to uphold the principles outlined in this Policy and to implement comparable standards within their own organizations.

Our Commitment

Arkem Chemicals B.V. is committed to conducting its business in a manner that respects human rights and human dignity. We strive to uphold these principles in our relationships with our employees, customers, suppliers, contractors, business partners and the communities in which we operate.

This Policy is guided by internationally recognized human rights standards, including:

- The Universal Declaration of Human Rights
- The United Nations Global Compact
- The United Nations Convention on the Rights of the Child
- The International Labour Organization (ILO) Fundamental Conventions
- The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- The United Nations Guiding Principles on Business and Human Rights
- Applicable national laws and regulations

This Policy should be read together with the Arkem Chemicals B.V. Code of Ethics and Working Principles, which establishes the ethical standards and business conduct expected from our employees and business partners.

In line with our corporate values and sustainability strategy, while safeguarding information security and business continuity, we are committed to:

HUMAN RIGHTS POLICY

- Identifying, assessing and mitigating human rights risks within our operations and throughout our value chain.
- Providing or cooperating in appropriate remediation where our business activities have caused or contributed to adverse human rights impacts.
- Promoting open, inclusive and constructive dialogue with all stakeholders, including vulnerable and disadvantaged groups, ensuring their concerns and expectations are heard, respected and appropriately considered.
- Cooperating with civil society organizations, industry associations and other relevant stakeholders where appropriate to promote respect for human rights.
- Ensuring that equal opportunity forms the basis of all employment-related decisions and human resource processes.
- Making all employment decisions—including recruitment, assignment, development, training, compensation and promotion—based solely on objective criteria such as qualifications, competence, performance, skills and experience.
- Valuing and respecting employees with diverse backgrounds, cultures, experiences and perspectives, supporting their development and encouraging long-term employment.
- Maintaining zero tolerance for discrimination, harassment, bullying, intimidation or retaliation based on race, colour, gender, national or social origin, ethnicity, religion or belief, age, disability, sexual orientation, gender identity, political opinion or any other characteristic protected by applicable law.
- Respecting employees' rights to establish, join or participate in trade unions or other lawful employee representative organizations without fear of intimidation, discrimination or retaliation.
- Respecting employees' right to express opinions, raise concerns and communicate openly and in good faith without fear of retaliation.
- Providing appropriate communication channels and participation mechanisms that enable employees to share ideas and concerns in a safe, respectful and confidential environment.
- Providing a safe, healthy and secure working environment and fully complying with applicable occupational health and safety legislation, regulations and internal company standards.
- Protecting the health, safety and well-being of our employees, contractors, visitors and other persons affected by our operations.
- Identifying, assessing and managing risks that may result in accidents, injuries or occupational illnesses through consultation with employees and continuous improvement of our health and safety practices.
- Maintaining zero tolerance for all forms of forced labour, bonded labour, involuntary labour, human trafficking and modern slavery.

HUMAN RIGHTS POLICY

- Ensuring that all employment relationships are entered into voluntarily, under fair working conditions and with equal opportunities for all employees.
- Implementing appropriate due diligence measures to prevent child labour within our own operations and throughout our supply chain and expecting the same commitment from our suppliers and business partners.
- Providing fair and competitive compensation in accordance with applicable legislation, sector practices and local labour market conditions.
- Complying with all applicable legal requirements relating to working hours, overtime, wages, employee benefits and employment conditions.
- Supporting employees' work-life balance by providing a healthy, safe and supportive working environment.
- Providing opportunities for employees to develop their skills, talents and careers through learning and professional development initiatives.

Supplier Expectations

We expect our suppliers, contractors and business partners to respect internationally recognized human rights and to comply with this Policy or equivalent standards. We may assess their compliance through our supplier qualifications, evaluation and due diligence processes and encourage continuous improvement where necessary.

Reporting Concerns

Arkem Chemicals B.V. encourages employees and external stakeholders to report any actual or suspected human rights concerns or violations through the Company's established reporting channels.

Reports will be handled confidentially, and where permitted by applicable law, may be submitted anonymously. Retaliation against anyone who raises a concern or reports a suspected violation in good faith will not be tolerated.

Questions, concerns or reports may be submitted via:

- ethics@arkem.com
- contact@arkem.eu

Governance

The Managing Director is responsible for the implementation, monitoring and periodic review of this Policy.

This Policy shall be reviewed at least annually, or more frequently where necessary, to ensure its continued relevance, effectiveness and alignment with applicable legal requirements and internationally recognized best practices. Any revisions shall be submitted to the Chief Executive Officer (CEO) for approval prior to implementation.

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HUMAN RIGHTS POLICY

Once approved, this Policy will be published on the Company's website and internal document management system and made available to all relevant stakeholders.

The quantitative targets established by the Managing Director under the Sustainable Procurement Policy are defined in detail within the Corporate Strategic Sustainability Targets (Document No. MNG-SG), which forms an integral part of this Policy.

Prepared by	Checked by	Approved by
OM/ JB	**FM**/ HD	**MD**/ BK