

IMCD Group Human Rights Policy

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1 GENERAL

1.1 Introduction

At IMCD, we have certain core values and guiding principles that are essential to the way we operate and key to fulfil our ambition to deliver sustainable and profitable long-term growth. We strive to operate in an environmentally friendly way, we respect international labour standards and human rights and we do not tolerate unethical behaviour. From our business partners, that form an important part of our value chain, we expect they do the same.

IMCD's position on business and human rights is embedded in our corporate culture and values. The key principles to ensure that IMCD's business operations and employees do not contribute, either directly or indirectly, to human rights violations have been included in the group's policies, processes, and procedures.

This IMCD Group Human Rights Policy (the "Policy") encapsulates IMCD's commitment to adhere to internationally recognised human rights standards and outlines IMCD's approach to safeguarding human rights in its operations and supply chain. This Policy applies to all IMCD Group entities and all our activities globally. For our business partners, the principles expressed herein are included in the "ESG Standards for IMCD Business Partners" (available on our website [here](#)).

1.2 Business and human rights risk management

This Policy is drafted under the responsibility of, and approved by, IMCD's Management Board. As part of the corporate sustainability agenda, IMCD's Supervisory Board oversees the strategy for the business and human rights and monitors achievement of the sustainability agenda.

The identification of human rights risks is integrated in the groups risk management and control framework, under which risk assessments take place on a regular, cyclic interval. The execution of the policy principles included herein, and the implementation of controls to mitigate identified risks, is the responsibility of the local management in IMCD's subsidiaries.

IMCD also strives to cooperate with its business partners to identify, prevent and mitigate potential business and human rights risks. The basis for this cooperation is laid down in the ESG Standards for IMCD Business Partners. We ask our business partners to implement in their organisation the requirements communicated to them and to inform IMCD immediately in case of any experienced or potential breach.

2 HUMAN RIGHTS PRINCIPLES

IMCD supports the aim of the [International Labour Organisation](#) (ILO) to implement universally accepted labour standards and recognise and respect human rights¹. In addition, IMCD supports the United Nations "Guiding Principles on Business and Human Rights" and the ten principles of the [United Nations Global Compact](#), to which IMCD is a signatory. Guided by these frameworks, the following policies apply in the IMCD group:

- **No discrimination**

IMCD prohibits discrimination or harassment based on age, caste, citizenship status, colour, disability or medical conditions, ethnicity, family or marital status, genetic information, gender identity or expression, language, military service, national origin, social origin, physical and mental ability, political affiliation, pregnancy, childbirth and related medical conditions, race, religion or religious creed, sexual orientation, socio-economic status, veteran status, union membership or any other characteristics protected by law.

¹ As expressed in the [United Nations International Bill of Human Rights](#) and the [MNE Declaration](#).

- **No harassment**
IMCD asks its employees to always treat others - colleagues and third parties alike - with dignity and respect and expects that all relationships among people in the workplace will be business-like and free of bias, harassment, and violence. This includes sexual, psychological, verbal and power harassment, mental and physical abuse, and intimidation.
- **Zero forced or child labour**
IMCD neither engages in nor support the use of forced, bonded or involuntary labour, or child labour.² IMCD will adhere to the standards of the International Labour Organisation (ILO) and minimum age requirements in all countries in which it conducts its business. IMCD prohibits assigning hazardous work to young workers (under 18).
- **Freedom of association and recognition of the right to collective bargaining**
IMCD recognises and respects its employee's freedom of association and assembly, as well as the right to collective bargaining and will not act to interfere with the exercise of such rights.
- **Health and safety**
IMCD is committed to a healthy and safe working environment and considers the protection of its employees' wellbeing of utmost importance and will comply with all applicable health and safety regulations governing its business activities.³
- **Appropriate wages and working hours**
IMCD provides appropriate wages and working hours for all employees. This includes a commitment to ensure that all workers are paid a "living wage" (i.e., the minimum remuneration to support basic needs) in accordance with applicable local law. In the absence of applicable law or collectively bargained labour agreement, working hours will not exceed 60 hours per week, including overtime, and a minimum of one day of rest per week is always provided.
- **Protection of personal information**
IMCD acknowledges the fundamental rights and freedoms of its employees and of third parties it deals with. This includes the rights that concern protection of privacy and protection of personal information. IMCD shall respect local privacy laws and regulations at all times and will ask individuals permission for using any personal information if required.

3 HUMAN RIGHTS DUE DILIGENCE

IMCD works to identify, prevent, and mitigate negative impacts on human rights in which we may be involved and complies with country-specific laws and regulations related to human rights due diligence, wherever applicable to its operations.⁴

In the decision-process to select and contract with third party (logistic) service providers, but also in, for example, in M&A due diligence processes, screening on environmental, social and governance factors is embedded. To this extent IMCD has invested in automated screening that includes, amongst other, a comprehensive database of adverse media sources, tagged for various categories of human right violations.

IMCD recognises the relevance of understanding any negative impacts from the perspectives of stakeholders affected by (potential) adverse human rights impacts linked to its business and is prepared to engage in a dialogue. Upon identifying human rights infringements that it has caused or contributed to, IMCD will endeavour to remediate them through appropriate grievance mechanisms.

² The term forced labour is used to refer as well to (modern) slavery and slave-like practices.

³ For this purpose, through IMCD group policies, more detailed rules, and regulations, including health and safety programs, apply at all offices, warehouses, and laboratories. IMCD employees must observe these rules and regulations at all times.

⁴ These include, for example, the UK Modern Slavery Act, California's Transparency in supply chains Act, and the German Supply Chain Act.

4 GRIEVANCE MECHANISMS

If an employee believes someone has violated this policy, the employee is encouraged to bring the matter to the attention of its local management or HR department, or, if there are reasons not to do so, report it via the [IMCD Internal Alert Procedure](#) or the [IMCD Ethics and Compliance Hotline](#). This Hotline is also open to third parties, as communicated to all IMCD business partners in the [ESG Standards for IMCD Business Partners](#). IMCD will promptly investigate the facts and circumstances of any claim that this policy has been violated and take appropriate corrective, or preventive measures.

5 REPORTING AND COMMUNICATION

IMCD will monitor the status of policy implementation and human rights due diligence, and will communicate report its policies, actions, and progress to its stakeholders through various channels, including the IMCD website and annual reporting.
