

## Conflict Minerals Policy

Syensqo SA and its subsidiaries ("Syensqo") are committed to meeting their responsibility to respect human rights. As part of this responsibility, Syensqo supports the global responsible sourcing of tin, tantalum, tungsten and gold from conflict and high risk areas. These minerals are commonly referred to as "3TG" or "conflict minerals."

Although Syensqo is not involved in the mining, processing or import of 3TG, and does not have direct supply relationships with mines or processors, Syensqo contributes to the transparency and protection of human rights along the 3TG supply chain according to the Organisation for Economic Co-operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas as well as the standards of the EU Regulation on Conflict Minerals, and by meeting any corresponding national and international legal requirement.

This Policy governs our corporate actions; Syensqo expects its suppliers to adopt policies and procedures that are consistent with this Policy. Suppliers who do not comply with these principles may be further evaluated for future business and sourcing decisions.

### Principles

- No violations of human rights

Syensqo does not knowingly purchase products, components or materials that contain 3TG from sources that tolerate human rights violations for use in Syensqo's products.

This applies in particular to:

- Any forms of torture, cruel, inhuman and degrading treatment.
- Any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily.
- The worst forms of child labour according the ILO convention 182.
- Other gross human rights violations and abuses such as widespread sexual violence.
- War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

- Working with trustworthy business partners

Syensqo does not tolerate any direct or indirect support to non-state armed groups in connection with the extraction, transport, trade, handling or export of minerals. This includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:

- Unlawfully control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain.
- Unlawfully tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded.
- Unlawfully tax or extort intermediaries, export companies or international traders.

- Involvement of Security Personnel

Syensqo does not contribute to direct or indirect support to public or private security personnel who unlawfully control mine sites, transportation routes and upstream actors in the supply chain; unlawfully tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or unlawfully tax or extort intermediaries, export companies or international traders.

Syensqo recognizes that the role of public or private security personnel is to provide security to employees, equipment and facilities to protect the mines or transportation routes from interference with legitimate extraction and trade. Where a company in Syensqo's supply chain contracts security personnel, Syensqo requires that such security personnel will respect human rights principles.

Syensqo, where applicable in its supply chain, supports efforts to engage with central or local authorities, international organisations and civil society organisations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security personnel for the provision of security could be improved.

Syensqo, where applicable in its supply chain, supports efforts to engage with local authorities, international organisations and civil society organisations to avoid or minimize the exposure of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security personnel, public or private, on mine sites.

- No bribery

In accordance with its Code of Business Integrity and Anti-Bribery and Anti-Corruption Policy,

Syensqo does not offer, promise, give or demand any bribes, and resists the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export.

- Payment of taxes, fees and royalties due to governments

When applicable, all taxes, fees, and royalties related to mineral extraction, trade, and export from conflict-affected and high-risk areas that may be due by Syensqo will be paid to governments and disclosed transparently according to international standards.

- No money laundering

Syensqo supports efforts to contribute to the effective elimination of money laundering where Syensqo identifies a reasonable risk of money laundering especially resulting from, or connected to, the extraction, trade, handling, transport, or export of minerals derived from the unlawful taxation or extortion of minerals at points of access to mine sites, along transportation routes, or at points where minerals are traded by upstream suppliers.

#### Actions required from our suppliers

Syensqo suppliers are required to implement the following actions with respect to the products, components and materials supplied to Syensqo:

- Not use 3TG from sources that are known to directly or indirectly finance or benefit armed conflict.
- Use their leverage to ensure that 3TG are sourced from “conformant” smelters and refiners to the extent practicable.
- Put in place procedures for the traceability of 3TG.
- Cooperate with Syensqo’s 3TG due diligence process, which includes providing Syensqo, from time to time, with written certifications and other information concerning the origin of 3TG included in products, components and/or materials supplied to Syensqo.
- Maintain reviewable business records supporting the source of 3TG.
- Adopt policies and procedures with respect to 3TG consistent with this Policy and the OECD Guidance.
- Request their suppliers to adopt policies and procedures that are consistent with this Policy.
- Establish a risk management process to prevent violations of their 3TG policy.

Suppliers are encouraged to contact the sourcing teams with whom they regularly conduct business if they have questions concerning this Policy.

In addition, concerns regarding this policy, or violations, can be reported to the Ethics Helpline, available in the following link:

<https://www.syensqo.com/en/about-us/ethics-and-compliance/ethics-helpline>

Information on our commitment to Human Rights can be found here:

<https://www.syensqo.com/en/about-us/ethics-and-compliance/code-business-integrity>

Syensqo's Supplier Code of Business Integrity can be accessed here:

<https://www.syensqo.com/en/about-us/ethics-and-compliance/code-business-integrity>

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