

## SPEAK UP POLICY

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### 1 Introduction

At Solvay, we protect our culture of integrity. We strive to uphold strong ethical and regulatory standards at all times, ensuring our actions align with policies, procedures and with our values and actively contribute to the future of a trusted company.

Integrity means fostering an environment in which every person feels confident and comfortable to speak up and raise concerns in good faith when witnessing potential breaches of law, policies, ethics and compliance standards or Solvay's Code of Business Integrity. It is about being committed to doing the right thing and about generating a respectful, energising and enjoyable work environment that enables us to perform at our best. We also invite third parties who interact with Solvay to raise concerns where appropriate.

We cannot address and remediate breaches unless we are aware of them.

This policy is part of the Solvay Speak up Program and aims to explain to you:

- the principles of confidentiality and anonymity (if legally permitted), when you report in good faith a concern, an actual or potential breach of law, policies or our Code of Business Integrity;
- the principles of non-retaliation towards people reporting in good faith breaches of law, policies or our Code of Business Integrity,
- the procedure for reporting actual or potential breaches of law, policies or our Code of Business Integrity.

This policy is available to you on Solvay's website and intranet, and at your local human resources' department and can be updated from time to time. It is applicable to each legal entity ("the Company") belonging to the Solvay Group ("Solvay").

This policy, the reporting channels and procedures are compliant with the requirements of applicable local laws.

### 2 Scope

#### 2.1 Who can use the Solvay reporting channels?

The Solvay reporting channels are accessible to all employees (including Solvay employees, former employees and candidates in a recruitment process, volunteers and trainees) as well as to any other third party (such as applicants, directors, shareholders, self-employed persons, consultants, contractors, suppliers and customers).

## SPEAK UP POLICY

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### 2.2 Scope

You can use the following matter types to report any actual or potential breach of law, policies or our Code of Business Integrity, as well as any information about such breaches and attempts to conceal such breaches:

- Accounting, Auditing Matters, Finance and Banking
- Antitrust/Competition
- Bribery/Corruption
- Computer, Email, Internet use and Social Media
- Confidentiality and Misappropriation
- Conflict of Interest
- Data Privacy
- Discrimination
- Diversity, Equity and Inclusion Matters
- Embezzlement, Theft, Robbery
- Environmental, Health, or Safety
- Fraud
- Harassment including Retaliation
- HR Matters
- Human Rights violations
- Insider Trading/Securities Violations
- International Trade/Trade Compliance
- Misconduct or Inappropriate Behaviour (deliberate or not)
- Substance Abuse
- Violence or Threat
- Other

A detailed description of these matter types is included in Appendix 1.

### 3 Reporting in good faith

Reports must be made in good faith; if you raise a concern about a potential or actual breach of law, policies or the Code of Business Integrity using the matter types above (hereafter: “the reporting person”), you need to have reasonable grounds to believe that the information is true at the time of reporting.

If the report is not made in good faith or is made with the sole purpose of damaging others, Solvay or the Company can take appropriate disciplinary and/or judicial actions against the reporting person in line with the applicable local laws.

## SPEAK UP POLICY

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### 4 Solvay reporting procedures

If you have any concerns or information about actual or potential breaches, you are encouraged to report it to Solvay as soon as possible.

If you are a Solvay employee, you can always reach out to and speak with your line manager or supervisor. Your line manager or supervisor is the best person to reach out to when you have a concern. Part of his/her job is to listen to your concerns and to act on them appropriately.

If you are a Solvay employee or a third party, you are encouraged to use the Solvay reporting channels for reporting an actual or potential breach in line with the reporting procedures in this Policy.

You can also reach out to any other person within Solvay, they will refer you to the Solvay reporting channels as appropriate.

#### 4.1 Solvay reporting channels

You can use the following Solvay reporting channels:

- the Solvay Ethics Helpline (URL); or
- an email or a phone call to the Regional Compliance Officer or the Chief Ethics & Compliance Officer.

Your report will be directly addressed and handled by Compliance professionals and every report will be taken seriously and followed up thoroughly.

##### 4.1.1. Solvay Ethics Helpline

The Solvay Ethics Helpline is a safe, reliable, and convenient method to report any actual or potential breach. The platform is run by an experienced third-party provider and you can trust that this reporting method is confidential.

You can make a report through the Solvay Ethics Helpline:

- by calling the toll-free phone number associated with the country of location (see Appendix 2); or
- by accessing the web intake site's URL using a computer; or
- by using a mobile phone scanning the QR Code.

It is toll-free and available to all Solvay employees and third parties 24 hours a day, 7 days a week, 365 days a year; you can call anytime from anywhere. You can make a report in 19 languages. No call-tracing or recording devices are used.

## SPEAK UP POLICY

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You can find more details about the Solvay Ethics Helpline in Appendix 2.

### **4.1.2. Chief Ethics & Compliance Officer and Regional Compliance Officers**

You can find the contact details of the Chief Ethics & Compliance Officer and the Regional Compliance Officers in Appendix 3.

### **4.2 Anonymous reporting**

We strongly encourage you to identify yourself, as this is helpful to properly and thoroughly follow up, investigate and address the reports.

However, if you feel uncomfortable identifying yourself, you can choose to remain anonymous. An anonymous report will be taken just as seriously as a non-anonymous report and will be handled according to the applicable local laws. If you wish to remain anonymous, you can do so by registering your report with the Solvay Ethics Helpline by clearly choosing that option.

### **4.3 What information should you include in your report?**

We encourage you to be as precise as possible and provide as many details as possible when reporting a concern or a breach.

To facilitate the investigation, your report should ideally include the following details (when the relevant information is known to you):

- a detailed description of the reported events;
- a detailed description of how and when the reported events came to your attention;
- the date and place of the reported events;
- the names and job positions of the persons involved, or information enabling their identification;
- the names of other people, if any, who can confirm the reported facts;
- whether anyone within Solvay is aware of the reported events and whether anyone tried to cover up or hide the existence of the reported events;
- how the reported events harm or could harm potentially Solvay;
- your name (unless if your report is anonymous);
- any other information or elements that may help the investigation team to verify the events.

When you report through the Solvay Ethics Helpline, these questions will be asked to you.

## SPEAK UP POLICY

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### 4.4 How is your report handled by Solvay?

#### 4.4.1 Procedure

##### 1 - Acknowledgment of receipt

You will receive an acknowledgement of receipt of the report within 7 days. Reporting through the Solvay Ethics Helpline will generate a file number which allows you to easily follow up on the report.

##### 2 - Analysis of the report and follow-up

The Compliance Officer will assess the information provided in your report and, where relevant, analyse the breach(es) reported and check if it is necessary to carry out an in-depth investigation.

The Compliance Officer will communicate with you, ask you for additional information if necessary, provide you feedback and/or follow up on potential new reports.

If you have chosen to remain anonymous, we encourage you to check the Solvay Ethics Helpline periodically to learn about the status of your report (in progress or closed) or to answer any possible additional questions raised through the Solvay Ethics Helpline.

##### 3 - Investigation

The Compliance Officer will decide whether a more in depth investigation is needed.

The Compliance Officer will take the lead in the investigation and may be assisted by internal experts and/or external experts where appropriate.

Investigations will be conducted thoroughly with due regard to the principles of (i) confidentiality, (ii) anonymity (if applicable), (iii) objectivity and fairness to all parties involved and (iv) non-retaliation.

##### 4 - Feedback

The Compliance Officer will provide you with appropriate feedback within a reasonable timeframe, not exceeding three months from the date of the acknowledgement of receipt of the report. If the investigation could not be finalised within that time frame, you will receive an update. Feedback will be shared taking into account confidentiality obligations. If you made a report anonymously, we encourage you to periodically check the status of your report on the Solvay Ethics Helpline.

##### 5 - Investigation report

Following the investigation, the Compliance Officer, if applicable, will prepare a report describing the investigation measures and actions to be taken. The report may be shared with the senior management of Solvay on a need-to-know basis only.

The final report will include the findings and the actions to be taken:

- i. In the event that a breach is demonstrated, relevant measures and disciplinary actions may be taken with the aim of remediating the breach and protecting Solvay; or
- ii. In case the investigation shows that there is insufficient or no evidence of a breach, no

## SPEAK UP POLICY

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further action will be taken. Process improvements may however still be required as well as feedback to the implicated parties.

### 4.4.2 Compliance Officers

All reports will be addressed and handled by independent, dedicated and trained compliance professionals. They are part of the Ethics & Compliance department at Solvay, reporting to the Chief Ethics & Compliance Officer. They are duly trained to conduct investigations and may, on a “need to” basis, ask assistance from internal or external experts and will treat the report confidentially to the best extent possible.

The Chief Ethics & Compliance Officer reports annually to the Audit Committee of Solvay’s Board of Directors about the Speak Up Program, trends and data in accordance with the confidentiality obligations.

### 4.5 Record keeping

Solvay and/or the Company keeps records of all reports received, in compliance with the confidentiality requirements provided in section 5.1 of this policy.

## 5 Speak Up Principles

This policy is based on the three following key principles: confidentiality, anonymity and non-retaliation.

### 5.1 Confidentiality

Solvay takes the necessary measures to ensure that reports and information that could reveal your identity remain confidential and are only disclosed on a need-to-know basis or if foreseen by local laws. Other information also remains confidential and can only be shared on a need-to-know basis.

### 5.2 Anonymity

Anonymity of the reporting person is explained under section 4.2.

### 5.3 Protection against retaliation

Regardless of how you report a breach, you are protected from any form of retaliation. Any person mentioned in section 2.1, who reports a breach of law, policies and the Code of Business Integrity in good faith according to this policy will be protected against retaliation under the Solvay Speak Up Program.

## SPEAK UP POLICY

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Any person, regardless of position, who engages in retaliatory behaviour will be subject to disciplinary or judicial actions in accordance with the applicable local laws.

### **6 Provisions applicable to EU countries only**

#### **6.1. Compliance with EU law and local laws**

This policy and the aforementioned reporting channels and procedures are compliant with the requirements of the Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union Law (The Directive) and applicable local laws.

#### **6.2. Material scope**

Although the EU law and local laws might be more restrictive, the Solvay reporting channels allow reporting on actual or potential breaches of all matters mentioned in section 2.2.

#### **6.3. Solvay reporting channels**

See section 4.1.1. (Solvay Ethics Helpline) and 4.1.2 (Compliance Officers).

It is recommended to report via the Solvay reporting channels mentioned under section 4.1. For the following countries: Belgium, Bulgaria, Italy and France, if you would nevertheless feel uncomfortable using the Solvay reporting channels mentioned under section 4.1, it is also possible to report via the local point of contact (hereafter: "local Whistleblowing Officer").

##### **6.3.1. Local reporting channels**

You can use the following channels:

- a face-to-face meeting with the local Whistleblowing Officer;
- an e-mail to the local Whistleblowing Officer.

You can find the contact details of the local Whistleblowing Officers in Appendix 4.

##### **6.3.2. Anonymous reporting**

For anonymous reporting, we encourage you to use the Solvay Ethics Helpline. A specific feature in the Helpline is installed to enable making anonymous reports in a very easy, accessible way.

## SPEAK UP POLICY

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If you would nevertheless feel uncomfortable using the Solvay Ethics Helpline and you still wish to report anonymously, you can do so by addressing an email to the local Whistleblowing Officer, through an email provider (Outlook, Gmail etc.), from which your identity cannot be deducted.

### **6.4. Procedure**

See section 4.4.1.

We strongly encourage you to use the Solvay reporting channels mentioned under section 4.1. as your report will be handled by independent, dedicated and trained Ethics & Compliance professionals.

If you would nevertheless feel uncomfortable that the procedure mentioned under section 4.4.1 is used, you can reach out to the local Whistleblowing Officer and the following procedure will apply.

You will receive an acknowledgement of receipt of the report within 7 days of the receipt. The local Whistleblowing Officer will assess the information provided in your report and will communicate with you, ask you for additional information if necessary, provide you feedback and follow up on potential new reports. The local Whistleblowing Officer consults with the Compliance Officer to conduct an investigation. The local Whistleblowing Officer will provide you appropriate feedback within a reasonable timeframe, not exceeding three months from the date of the acknowledgement of receipt of the report. If the investigation could not be finalised, you will receive an update. Feedback will be shared taking into account confidentiality obligations.

### **6.5 Confidentiality and protection against retaliation**

Confidentiality and the protection against retaliation under the EU law and the local laws of EU countries are only applicable for reports related to breaches as foreseen by local laws. Solvay will comply with additional protective measures foreseen in the local laws of EU countries, if needed.

### **6.6 External reporting channels**

You can use an external reporting channel after having first reported through the Solvay reporting channels or can go directly through the external reporting channels if you consider it more appropriate. Be aware that external reporting channels outside of Solvay can only be used for reports related to breaches regarding well-defined matters. More information about these external reporting channels can be found in Appendix 5.

## **7 Processing of Personal Data**

In the framework of the internal reporting procedures, the Company is considered as a joint data controller for the processing of personal data together with Solvay.



## **SPEAK UP POLICY**

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In this framework, personal data may also be communicated to external service providers, in particular to Navex, i.e. the provider in charge of the platform for the Solvay Ethics Helpline, who will act as data processor.

Any processing of personal data carried out pursuant to this policy will be carried out in accordance with the applicable personal data protection laws, including the European General Data Protection Regulation ("GDPR") and local data protection laws.

The following personal data may be processed in the context of a report: your name, function, start date of collaboration (if applicable), contact information and e-mail address unless the report is done anonymously, and of persons, involved in the breach, any identified or identifiable information provided by you and collected in the context of the internal investigation. This processing of data is done in the context of complying with a legal obligation and/or the legitimate interest of the Company, to the extent that the internal reporting channel exceeds legal objectives, in particular the detection of breaches, ensuring the security and ethical conduct of the Company and/or Solvay.

Personal data which are manifestly not relevant for the handling of a report shall not be collected or, if accidentally collected, shall be deleted without undue delay. Relevant data will be kept until the breach reported is expired and in any case for a period of five years after the report.

This data can also be transmitted outside the European Economic Area and/or be accessed from countries outside the European Economic Area to Solvay's entities and to our subcontractors involved in the process. Solvay has taken the appropriate safeguards to ensure the security of the data. You may request additional information in this respect and obtain a copy of the applied safeguard by exercising your rights as set out below.

All individuals whose personal data are processed in the context of reports of breaches have, within the applicable legal conditions, the right to access and copy, right to rectification, right to data erasure (providing that there is no limitation from a legal obligation), right to object (unless the legal basis is a legal obligation), right to limit the processing activity and the right to lodge a complaint with the supervisory authority in accordance with applicable law. However, these rights may be limited by the rights and freedoms of others, in particular the reporting person's right to confidentiality and the Company's right to follow-up on the report properly.

For more information on the processing of personal data, we refer to the Navex Privacy Notice and Solvay Privacy Policy (see Appendix 6).

### **8 Entry into Force**

This policy is effective from January 1<sup>st</sup>, 2024 for an indefinite period.

Solvay reserves the right to amend this policy at any time, including but not limited to changes in relevant legislation and/or operational needs.

## **SPEAK UP POLICY**

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Appendices:

- Appendix 1: Speak Up matters and their description
- Appendix 2: Ethics Helpline
- Appendix 3: Chief Ethics & Compliance Officer and Regional Compliance Officers
- Appendix 4: Local Whistleblowing Officers
- Appendix 5: External Reporting Channels
- Appendix 6: Privacy Notice and Privacy Policy

## SPEAK UP POLICY

### Appendix 1 Speak up matters and their description

Matter type	Description
<b>Accounting, Auditing Matters, Finance and Banking</b>	The unethical systematic recording, analysis of the business and financial transactions associated with generally accepted accounting practices and concerns regarding questionable or unethical banking practices. (Examples include: misstatement of revenues, misstatement of expenses, and misstatement of assets, misapplications of GAAP principles, wrongful transactions, money laundering, bank fraud; embezzlement; altering, fabricating, falsifying or forging of any banking document, report or record).
<b>Antitrust/Competition</b>	The unethical systematic recording, analysis of the business and financial transactions associated with generally accepted accounting practices and concerns regarding questionable or unethical banking practices. (Examples include: misstatement of revenues, misstatement of expenses, and misstatement of assets, misapplications of GAAP principles, wrongful transactions, money laundering, bank fraud; embezzlement; altering, fabricating, falsifying or forging of any banking document, report or record).
<b>Bribery/Corruption</b>	The act of influencing the action of another (private or public party) by offering or promising some advantage (favours, payments, gifts, entertainment) that could be reasonably interpreted as an effort to improperly influence a decision.
<b>Computer, Email, Internet use and Social Media</b>	Unauthorised or inappropriate use of any Company computer system, emails or internet including references to the company or its employees through any social media.

## SPEAK UP POLICY

<p><b>Confidentiality and Misappropriation</b></p>	<p>Confidentiality refers to the protection of the Company's and our customer's non-public information and use of such information only for legitimate business purposes. Misappropriation refers to the unauthorised or improper use of a third party's intellectual property rights, including patents, trademarks, copyrights and trade secrets.</p>
<p><b>Conflict of Interest</b></p>	<p>A conflict of interest is defined as a situation in which a person, such as a public official, an employee, or a professional, has a private or personal interest sufficient to appear to influence the objective exercise of his or her official or professional duties. (Examples include: inappropriate vendor relations, bribery, inappropriate customer relations).</p>
<p><b>Data Privacy</b></p>	<p>Breach of the duty to guard, protect and process personal information in compliance with the law and current policies.</p>
<p><b>Discrimination</b></p>	<p>Employment decisions/treatment based on protected categories such as race, color, religion, national origin, age, disability, gender, and other protected categories.</p>
<p><b>Diversity, Equity and Inclusion Matters</b></p>	<p>Any type of discrimination or non-inclusive behaviour toward an individual or group due to their representation of various identities and differences.</p>
<p><b>Embezzlement, Theft, Robbery</b></p>	<p>Embezzlement - To appropriate (as property entrusted to one's care) fraudulently to one's own use. (Examples include: bookkeeping errors, misapplication of funds, and mishandling of cash).</p> <p>Robbery - the crime of stealing from somewhere or someone.</p> <p>Theft - The act of stealing; specifically: the</p>

## SPEAK UP POLICY

	felonious taking and removing of personal property with intent to deprive the rightful owner of it.
<b>Environmental, Health, or Safety</b>	Violation of any environmental law, regulation, corporate policy or procedure with respect to the handling and disposal of hazardous materials or the health and safety of other individuals.
<b>Fraud</b>	Any matter related to fraud that is not listed above including social and tax fraud.
<b>Harassment including Retaliation</b>	<p>Harassment is any conduct with the purpose or effect of violating the dignity of a person or creating an intimidating, hostile, degrading, humiliating, bullying, or offensive work environment, including moral or sexual harassment.</p> <p>Retaliation for making a complaint/report or for participating in an investigation or legal proceeding related to any potential violation of policy or law.</p>
<b>HR Matters</b>	HR matters include compensation, benefits, recruitment, firing as long as they do not involve potential criminal or administrative violations.
<b>Human Rights violations</b>	Actions, omissions, activities, policies, or practices that infringe on Human Rights in violation of law or company policies. Prohibited conduct includes, but is not limited to, forced labor, child labor, human trafficking, abuse of immigrant workers or undocumented migrants
<b>Insider Trading/Securities Violations</b>	Infringement, transgression; specifically: an infringement of the rules which securities acts define or internal police.
<b>International Trade/Trade Compliance</b>	Violation of any import or export law, corporate policy or procedure regarding export control (dual use /military), trade control (chemical precursors, dangerous chemicals, etc.) and economic sanctions. Examples include, transactions involving an embargoed country, a sanctioned entity and export of products or transfer of technology without appropriate licences in place.

## SPEAK UP POLICY

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<b>Misconduct or Inappropriate Behaviour</b>	Intentional wrongdoing; specifically: deliberate violation of a law or standard.
<b>Substance Abuse</b>	Substance abuse is defined as the misuse of both legal and illegal drugs including alcohol. (Examples include: cocaine, narcotics, marijuana, stimulants)
<b>Violence or Threat</b>	Violence is an expression of the intention to inflict evil, injury, or damage to a person or their property. (Examples include: direct, veiled, conditional, violent)
<b>Other</b>	Any matter type of public interest that has not been identified in the list above including criminal offences, violation of applicable EU law or national law.

## SPEAK UP POLICY

### Appendix 2 Solvay Ethics Helpline

#### 1 Making a Report by Phone

The telephone service is available in all countries where Solvay operates. However, depending on the location, there are different steps that must be followed by the reporter to reach an operator in your language.

##### 1.1 Direct call

The countries below have a direct contact number. In these cases, there are no additional steps you need to take, just dial the phone number corresponding to your country:

COUNTRIES	NUMBERS	COUNTRIES	NUMBERS
Argentina	0800-444-1353	Mexico	001-877-978-0053
Australia	1-800-09-4082	Netherlands	0800-023-1041
Austria	0800-295-594	New Zealand	0800-447737
Belgium	0800-7-2087	Norway	800 25 062
Brazil	0800-891-4445	Peru	(0800) 78357
Canada	8882976882	Poland	0-0-800-111-1701
Colombia	01-800-5189515	Portugal	800-811117
Czech Republic	800-142-550	Saudi Arabia	800 850 0460
Denmark	80-882809	Serbia	0800 500401
Finland	0800-1-14945	Singapore	800-1204201
France	0800-914445	South Africa	080-09-92604
Germany	0800-181-0779	Spain	900-97-1017
Greece	00800-12-6576	Sweden	020-10 93 50
Hong Kong	800 933 816	Switzerland	0800-562907
Hungary	06-800-17199	Taiwan	00801-13-7956
Indonesia	007-803-321-8254	Thailand	001-800-11-002-1519
Ireland	1 800 903 353	Ukraine	0800 805 140
Italy	800-788671	United Arab Emirates	800 0320479
Jamaica	1 (877) 308-5148	United Kingdom	0808-234-4113
Kazakhstan	8 (800) 555-70-76	Uruguay	000-413-598-5523
Latvia	80 003 966	US	8882976882
Luxembourg	800 22 991	Venezuela	0800-1-00-4586
Malaysia	1-800-81-6657	Vietnam	120-11067

##### 1.2 1-step dialling

The countries below have a direct contact number, but the number changes according to the phone services provider.

COUNTRIES	NUMBERS
China	China (Unicom/Netcom) 10-800-711-0809 China (Telecom) 10-800-110-0751

## SPEAK UP POLICY

India	000-800-100-1071 000-800-001-6112 *both lines are open to all carriers
Japan	Japan (KDDI) 00531-11-4794 Japan (Softbank Telecom) 0066-33-801246 Japan (Softbank Telecom) 0066-33-112647 Japan (NTT) 0034-800-900119
South Korea	Korea (Dacom) 00308-110-480 Korea (Telecom) 00798-14-800-6599 Korea (Telecom) 00798-1-1-009-8084

### 1.3 2-step dialling

For the countries below, please:

Choose your phone provider and when the English prompt says: "Please enter the number you are calling now," dial 888-297-6882.

If you are not able to report using this method, please choose one of the other options available listed above.

COUNTRIES	NUMBERS
Bulgaria	From an outside line dial the direct access number for your location: Bulgaria 00-800-0010 At the English prompt dial 888-297-6882
Croatia	From an outside line dial the direct access number for your location: Croatia 0800-220-111 At the English prompt dial 888-297-6882
Guatemala	From an outside line dial the direct access number for your location: Guatemala (Claro) 999-9190 At the English prompt dial 888-297-6882
Romania	From an outside line dial the direct access number for your location: Romania (Telekom Romania) 0808-03-4288 At the English prompt dial 888-297-6882
Turkey	From an outside line dial the direct access number for your location: Turkey 0811-288-0001 At the English prompt dial 888-297-6882
Egypt	From an outside line dial the direct access number for your location: Egypt (Cellular) 02-2510-0200 Egypt (Cairo) 2510-0200 At the English prompt dial 888-297-6882
Russia	From an outside line dial the direct access number for your location: Russian Federation 8^10-800-110-1011 Russian Federation (Moscow) 8^495-363-2400 Russian Federation (Outside Moscow) 8^495-363-2400 Russian Federation (Outside St. Petersburg) 8^812-363-2400 Russian Federation (St. Petersburg) 8^812-363-2400 At the English prompt dial 888-297-6882



## SPEAK UP POLICY

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### 1.4 Other countries

For the countries below there is no phone number available. Please make your report using one of the other channels available listed above.

- Congo (Democratic Republic of Congo);
- Mongolia;
- Morocco;
- Zambia.

### 2 Making a report online

You can make a report online:

- by accessing the web intake site's URL using a computer (<https://secure.ethicspoint.eu/domain/media/en/gui/34618/index.html>);
- by using a mobile phone and
  - (i) accessing the web intake site's URL (<https://solvay.navexone.com/>), or
  - (ii) scanning the QR Code:



## SPEAK UP POLICY

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### Appendix 3 Chief Ethics & Compliance Officer and Regional Compliance Officers

<b>Chief Ethics &amp; Compliance Officer</b>	<b>Name:</b> Julien Sauvageot <b>Tel. n°:</b> +32 2 2641605 <b>Email address:</b> <a href="mailto:julien.sauvageot@solvay.com">julien.sauvageot@solvay.com</a>
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<b>Regions</b>	<b>Regional Compliance Officers</b>
<b>EMEA / APAC</b>	<b>Name:</b> Christelle Genin <b>Tel. n°:</b> +33 4 3724 8615 <b>Email address:</b> <a href="mailto:christelle.genin@solvay.com">christelle.genin@solvay.com</a>
<b>LATAM / NAM</b>	<b>Name:</b> Flavio Macias <b>Tel. n°:</b> +55 11 99979 0901 <b>Email address:</b> <a href="mailto:flavio.macias@solvay.com">flavio.macias@solvay.com</a>

## SPEAK UP POLICY

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### Appendix 4 Local Whistleblowing Officers

Find [here](#) the appointed Local Whistleblowing Officers.

## SPEAK UP POLICY

### Appendix 5 External reporting channels

EU country	External reporting channels
<p><b>Belgium</b></p>	<p>The Federal Coordinator is designated by the Belgian legislator with coordinating reports introduced via external channels. He/she is responsible for receiving external reports, checking their admissibility and forwarding them to the competent authority for investigation, which will be different depending on the subject of the report. In exceptional cases, the Federal Coordinator may also conduct the investigation in depth. The Federal Coordinator's contact details are as follows:</p> <p>Address: Leuvenseweg 48 bus 6, 1000 Brussels            Online reporting: <a href="https://www.federaalombudsman.be/en/disclosure-reporting-form">https://www.federaalombudsman.be/en/disclosure-reporting-form</a>            Email: <a href="mailto:integrity@federalombudsman.be">integrity@federalombudsman.be</a>            Telephone: 02 289 27 04</p> <p>A report can also be sent directly to the following authorities:</p> <ul style="list-style-type: none"> <li>1° the Federal Public Service Economy, SMEs, Self-Employed and Energy;</li> <li>2° the Federal Public Service Finances;</li> <li>3° the Federal Public Service of Public Health, Food Chain Safety and Environment;</li> <li>4° the Federal Public Service Mobility and Transport;</li> <li>5° the Federal Public Service Employment, Labour and Social Dialogue;</li> <li>6° the Programming Public Service Social Integration, Poverty Reduction, Social Economy and Metropolitan Policy</li> <li>7° the Federal Agency for Nuclear Control;</li> <li>8° the Federal Agency for Medicines and Health Products;</li> <li>9° the Federal Agency for the Safety of the Food Chain;</li> <li>10° the Belgian Competition Authority;</li> <li>11° the Data Protection Authority;</li> <li>12° the Financial Services and Markets Authority;</li> <li>13° the National Bank of Belgium;</li> <li>14° the Audit Oversight College;</li> <li>15° the authorities reported in article 85 of the Law of 18 September 2017 on the prevention of money laundering and terrorist financing and on the restriction of the use of cash</li> <li>16° the National Committee for the Security of Drinking Water Supply and Distribution;</li> <li>17° the Belgian Institute for Postal Services and Telecommunications;</li> <li>18° the National Institute for Health and Disability Insurance;</li> <li>19° the National Institute for Social Insurance of the Self-Employed;</li> <li>20° the National Employment Service;</li> <li>21° the National Office for Social Security;</li> <li>22° the Social Intelligence and Investigation Service;</li> <li>23° the Autonomous Anti-Fraud Coordination Service (CAF);</li> <li>24° the Maritime Inspectorate.</li> </ul>
<p><b>Bulgaria</b></p>	<p>Reports in scope of the Bulgarian Whistleblower Protection Act may also be submitted via (1) the internal reporting channel of Solvay or (2) via the external reporting channel to the Commission for Personal Data Protection (the "CPDP"), or both. In view of the possibility to quickly prevent a breach, or remedy the consequences of such breach, the report shall be submitted with priority through an internal reporting channel, unless there is a risk for the reporting person of retaliatory discriminatory actions, or that no effective measures will be taken to verify the report in order to remedy the breach.</p> <p>The report may be submitted to the CPDP in one of the following ways:</p> <ul style="list-style-type: none"> <li>▪ in writing:           <ul style="list-style-type: none"> <li>- by email to <a href="mailto:whistleblowing@cpdp.bg">whistleblowing@cpdp.bg</a></li> </ul> </li> </ul>

## SPEAK UP POLICY

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	<ul style="list-style-type: none"><li>- by post mail to: Sofia 1592, 2 Prof. Tsvetan Lazarov Blvd.</li><li>▪ orally:<ul style="list-style-type: none"><li>- on site at the CPDP at: Sofia 1592, 2 Prof. Tsvetan Lazarov Blvd..</li></ul></li></ul> <p>Information about external reporting is also available in Bulgarian on the CPDP website: <a href="https://www.cdpd.bg/?p=sub_rubric&amp;aid=285">https://www.cdpd.bg/?p=sub_rubric&amp;aid=285</a>.</p>
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## SPEAK UP POLICY

<p><b>France</b></p>	<p>You can also choose to make an external report, either after having made an internal report, or directly, to one of the following authorities:</p> <ul style="list-style-type: none"> <li>▪ the Défenseur des droits, who will deal with the report if it falls within his or her remit (particularly discrimination), or who will direct it to the authority or authorities best placed to deal with it:             <ul style="list-style-type: none"> <li>- By post: Défenseur des droits, Libre réponse 71120, 75342 Paris Cedex 07</li> <li>- By e-mail using the form provided: <a href="http://choix.du.des.motif(s).defenseurdesdroits.fr">Choix du/des motif(s) (defenseurdesdroits.fr)</a></li> </ul> </li> <li>▪ the judicial authorities, in particular by writing to the Public Prosecutor;</li> <li>▪ a European Union institution, body, office or agency competent to collect information on violations falling within the scope of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019;</li> <li>▪ one of the authorities listed in the appendix to Decree 2022-1284 of 3 October 2022, in particular, in a professional context:             <ul style="list-style-type: none"> <li>- the DGT (Direction Générale du travail) for individual and collective labour relations and working conditions:                 <ul style="list-style-type: none"> <li>- By post: Direction générale du travail, Ministère du Travail, du Plein emploi et de l'Insertion, 39-43 quai André Citroën, 75015 Paris, France</li> <li>- By email: <a href="mailto:alerte-travail@travail.gouv.fr">alerte-travail@travail.gouv.fr</a></li> </ul> </li> <li>- DGEFP (Délégation générale à l'emploi et à la formation professionnelle) on employment and training:                 <ul style="list-style-type: none"> <li>- By post: Ministère du Travail, du Plein-emploi et de l'Insertion, Délégation générale à l'emploi et à la formation professionnelle (DGEFP), Pôle juridique, 14 avenue Duquesne, 75350 PARIS SP 07</li> <li>- By electronic means using the proposed teleservice: <a href="#">Dispositif de recueil des signalements externes dans le champ de l'emploi et de la formation professionnelle   MINISTERE DU TRAVAIL DU PLEIN EMPLOI ET DE L'INSERTION</a></li> </ul> </li> <li>- Cnil regarding the protection of privacy and personal data:                 <ul style="list-style-type: none"> <li>- by post: 3 place de Fontenoy, TSA 80715, 75334 PARIS CEDEX 07</li> <li>- by electronic means using the proposed teleservice (<a href="#">Adresser une plainte à la CNIL   CNIL</a>)</li> <li>- by telephone: 01 53 73 22 22</li> </ul> </li> </ul> </li> </ul>
<p><b>Germany</b></p>	<p>In Germany, there are three different authorities to which a report under the German Whistleblower Act (Hinweisgeberschutzgesetz) can be made. Each authority is responsible for reports from certain areas. Each authority has set up its own whistleblowing system, which can be accessed and completed</p>

## SPEAK UP POLICY

online. In each system, the report can be made by naming yourself or anonymously. Reports can also be submitted by post, phone or in person. The respective contact details are shown below:

### I. Report to the Federal Office of Justice (BfJ)

The Federal Office of Justice is competent for notifications pursuant to sec. 20 subsec. 4 HinSchG.

#### 1) Via electronic whistleblower system

The whistleblowing system of the Federal Office of Justice (BfJ) and can be reached via link:

[https://www.bundesjustizamt.de/DE/MeldestelledesBundes/MeldestelledesBundes\\_node.html](https://www.bundesjustizamt.de/DE/MeldestelledesBundes/MeldestelledesBundes_node.html)

#### 2) By post (in German or English):

Bundesamt für Justiz

Externe Meldestelle des Bundes

53094 Bonn

#### 3) By phone (in German or English):

The external reporting channel accepts your reports by phone from Monday to Thursday from 9.00 am to 3.00 pm and on Friday from 9.00 am to 1.00 pm.

0228 99 410-6644

#### 4) If you appear in person (in German or English):

The external reporting channel will also accept your reports in person. Please make an appointment in writing or by telephone (Monday to Thursday from 9.00 a.m. to 3.00 p.m. and Friday from 9.00 a.m. to 1.00 p.m.).

### II. Report to the Federal Financial Supervisory Authority (BaFin)

Reports can be submitted to BaFin in accordance with sec. 21 (1) HinSchG.

#### 1) Via electronic whistleblower system

The whistleblowing system of the Federal Financial Supervisory Authority (BaFin) can be reached via the link:

<https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=2BaF6&c=-1&language=eng>

#### 2) By post (in German or English)

Bundesanstalt für Finanzdienstleistungsaufsicht

Hinweisgeberstelle

## SPEAK UP POLICY

Graurheindorfer Straße 108

53117 Bonn

### 3) By phone (in German or English)

BaFin's whistleblowing channel accepts your reports by telephone from Monday to Thursday from 9.00 am to 3.00 pm and on Friday from 9.00 am to 1.00 pm.

0228 / 4108 - 2355

### 4) In person (in German or English)

The whistleblowing channel will also accept your reports in person. Please make an appointment by telephone (Mondays to Thursdays 9.00 a.m. - 3.00 p.m. and Fridays 9.00 a.m. - 1.00 p.m.)

### III. Report to the Federal Cartel Office (Bundeskartellamt)

The competence of the Federal Cartel Office results from sec. 22 HinSchG.

#### 1) Via electronic whistleblower system

The whistleblowing system of the Federal Cartel Office can be reached via the link:

<https://www.bkms-system.net/bkwebanon/report/channels?id=bkarta&language=ger>

#### 2) By post (in German or English)

Bundeskartellamt

- Externe Meldestelle -

Kaiser-Friedrich-Str. 16,

53113 Bonn

#### 3) By phone (in German or English)

The external reporting office at the Bundeskartellamt can be reached by telephone as follows:

Monday to Thursday from 9.00 a.m. to 3.00 p.m.

Friday from 9.00 a.m. to 2.00 p.m.

0228 / 9499 5980.

#### 4) By email (in German or English)

E-mail: [Externe-Meldestelle@bundeskartellamt.bund.de](mailto:Externe-Meldestelle@bundeskartellamt.bund.de)



## SPEAK UP POLICY

<p><b>Italy</b></p>	<p>You can also make a report through the channel established by ANAC ("Autorità Nazionale Anticorruzione", <a href="https://www.anticorruzione.it/-/whistleblowing">https://www.anticorruzione.it/-/whistleblowing</a>), if, at the time of reporting, one of the following conditions is met:</p> <ul style="list-style-type: none"> <li>• you have already made a report to Solvay pursuant to the Speak Up Policy and no follow-up has been provided;</li> <li>• you have reasonable grounds to believe that, if you make a report according to the Speak Up Policy, it would not be effectively followed up, or that such report may result in the risk of retaliation;</li> </ul> <p>you have reasonable grounds to believe that the violation you are reporting may constitute an imminent or obvious danger to the public interest.</p>
<p><b>Poland</b></p>	<p>A notifier/whistleblower has a right to submit information about breach of law to competent public authorities.</p>
<p><b>Portugal</b></p>	<p>In fact, the Portuguese law determines that, at least, the following entities must have an external reporting channel:</p> <ol style="list-style-type: none"> <li>a) The Public Prosecutor's Office;</li> <li>b) The criminal police;</li> <li>c) The Bank of Portugal;</li> <li>d) Any other Independent administrative authorities;</li> <li>e) Public institutes;</li> <li>f) General inspection services and similar bodies and other central services of the state's direct administration with administrative autonomy;</li> <li>g) Local authorities; and</li> <li>h) Public associations.</li> </ol>
<p><b>Spain</b></p>	<p>Nothing in this policy prevents you from going directly to any relevant competent authority with your concern without first going through the internal process detailed in this Policy. The identity of the relevant authority will vary with each jurisdiction.</p> <p>In Spain, this will be the Independent Authority for Whistleblower Protection (in Spanish, Autoridad Independiente de Protección del Informante, A.A.I.). Once the A.A.I. has been set up, any natural person may report to it any actions or omissions included in the scope of application of Law 2/2023 of 20 February, either directly or after notifying Solvay through the Whistleblower Channel.</p>
<p><b>The Netherlands</b></p>	<p>Reporting suspicions of wrongdoing to your own organization first is preferred. Solvay will then have the opportunity to immediately address the report itself, end any wrongdoing as quickly as possible and to take measures to prevent future wrongdoing. Reporting internally first, however, is not mandatory. If, for any reason, you prefer to report directly to an external reporting channel, you may do</p>

## SPEAK UP POLICY

so as well. You can report to an authority that is competent with respect to the subject of the suspicion of wrongdoing, such as an inspectorate or a supervisor. If you choose to report directly externally, you will be entitled to (the same) protection as with an internal report.

To report a suspicions of wrongdoing externally, you can contact the following competent authorities:

- House for Whistleblowers (in Dutch: *Huis voor klokkenluiders* (HvK): [Ik vermoed een misstand | Huisvoorklokkenluiders](#);
- Authority for Consumers & Markets (in Dutch: *Autoriteit Consument en Markt* (ACM): [Bescherming klokkenluiders | ACM.nl](#);
- Authority for the Financial Markets (in Dutch: *Autoriteit Financiële Markten* (AFM): [Bescherming klokkenluiders \(afm.nl\)](#);
- Dutch Central Bank (in Dutch: *de Nederlandsche Bank N.V.* (DNB): [Contact en veelgestelde vragen \(dnb.nl\)](#);
- Health and Youth Inspectorate (in Dutch: *Inspectie gezondheidszorg en jeugd* (IGJ): [Melden over uw werkgever \(klokkenluidersmelding\) | Inspectie Gezondheidszorg en Jeugd \(igi.nl\)](#);
- Dutch Healthcare Authority (in Dutch: *Nederlandse Zorgautoriteit* (NZa): [Meldpunt misstanden bij zorgaanbieders of zorgverzekeraars \(klokkenluiders\) | Contact | Nederlandse Zorgautoriteit \(nza.nl\)](#);
- Authority for Nuclear Safety and Radiation Protection (in Dutch: *Autoriteit Nucleaire Veiligheid en Stralingsbescherming* (ANVS): [Overtreding of misstand melden | Autoriteit NVS](#);
- Dutch Data Protection Authority (in Dutch: *Autoriteit persoonsgegevens* (AP): [Autoriteit Persoonsgegevens](#);
- Human Environment and Transport Inspectorate (in Dutch: *de Inspectie Leefomgeving en Transport* (ILT): [Home | Inspectie Leefomgeving en Transport \(ILT\) \(ilent.nl\)](#);
- Netherlands Labour Authority (in Dutch: *Nederlandse Arbeidsinspectie* (NLA): [Home | Nederlandse Arbeidsinspectie \(nlarbeidsinspectie.nl\)](#);
- Netherlands Food and Consumer Product Safety Authority (in Dutch: *Nederlandse Voedsel- en Warenautoriteit* (NVWA): [Home | NVWA](#).

The above authorities all have their own area of competence to investigate a report of a suspicion of wrongdoing. If no specific authority is competent given the subject of the report of a suspicion of wrongdoing, then the House of Whistleblowers is authorised to investigate the report.

## SPEAK UP POLICY

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### Appendix 6 Privacy notice and privacy policy

#### General information notice for Solvay employees

Solvay collects and processes personal data relating to you in order to manage our employment relationship with you. We are committed to being transparent about how we collect and use such data.

Below you will find more information about the conditions under which we process your personal data as controller (i.e. the legal entity which decides on the purposes and means of the processing of your personal data), your rights and our obligations in relation to such processing pursuant to the EU General Data Protection Regulation 2016/679 ("GDPR") and local legislations.

#### **What is "personal data"?**

Personal data means the data we collect about you and that can be used to identify you directly (i.e. based on a piece of data alone) or indirectly (i.e. from that data in combination with other data that is available or likely to be available).

#### **What personal data is collected about me?**

We may collect and process the following categories of personal data, as part of our activities and, where applicable, legal obligations as employer:

- Identification data (such as name, surname, address, place and date of birth, civil status, language, nationality, gender, photo (optional), employee identification number, passport or drivers' license number, license plate and, to the extent legally allowed or imposed, national identification number/copy of identity card/social security number);
- Personal details emergency contact (optional) and health data;
- Personal details for expatriates/secondment agreement: such as household composition, housing characteristics, passport copy, health data required by questionnaires for immigration; name, surname, birth date of child(ren) and partner for health insurance;
- Data related to the performance of your employment contract and career (such as function, title, department, workplace, employment regime, time management (including absenteeism type), education history, professional experience, relevant skills, seniority, CV and letters of application, letters of recommendation, performance assessment & feedback, learning/training, employee profile, development and career evolution, elements determining the allocation of additional remuneration);
- Financial data (such as bank account details, salaries, wages, bonuses, (fringe) benefits, options and other incentives schemes);
- Data related to business travel and expenses incurred in this respect;
- Data related to the use of the access badge and use of a "book a seat" application (i.e. our management tool enabling you to book a seat prior to working in our offices where accessible);
- Data related to the use of telephones, mobile phones and other electronic devices such as computer (e.g. passwords, log data, IP address, electronic identification data);
- Images (i.e. images collected through CCTV (video surveillance)) and sound recordings (i.e. voice and phone recordings);

## SPEAK UP POLICY

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- Data collected via regular employee surveys (on wellbeing, workforce experience and safety in agile environment). Please note that no result will be displayed if we obtain less than five responses or ten responses in case of verbatim; and
- Data collected in the course of investigations to comply with legal obligations, following a breach of the Code of Conduct/Solvay's rules and regulations or litigation (e.g interview reports, facts reported by a reporter about a suspected violation, contact details of individuals allegedly involved, data on criminal convictions or offenses, testimonies, electronic correspondence, certificates etc.)

### Why is my personal data collected and on which legal basis?

#### 1. Legal basis for the processing

We are not allowed to process personal data if we do not have a valid legal ground. Therefore, we will only process personal data if:

- where required, we have obtained your prior consent;
- the processing is necessary to perform our contractual obligations towards you, as your employer or not, or to take pre-contractual steps e.g. upon your recruitment;
- the processing is necessary to comply with our legal or regulatory obligations;
- the processing is necessary to protect your vital interests or those of another individual; or
- the processing is necessary for our legitimate interests, i.e. recruiting, developing and retaining talents, fostering your performance, being recognized as a diverse and international company, ensuring the smooth departure of employees and their succession, and managing working resources optimally, which have been assessed and are not outweighed by your rights and freedoms. Please note that, when processing your personal data on this basis, we always seek to maintain a balance between our legitimate interest and your privacy.

Please note that the provision of certain personal data is necessary for us to enter into a contract with you and perform our obligations under such contract. Failure to provide the necessary personal data will hinder Solvay's ability to enter into an employment contract with you and to administer efficiently the rights and obligations arising as a result of the employment relationship.

#### 2. Purposes of the processing

We require your personal data to carry out our activities and, where applicable, fulfill our obligations as your employer, and in particular for the following specific purposes:

- Career development and follow up, including the analysis for internal mobility, review of performance, coaching, mentoring as well as the development succession planning (DSP) and management of top talents;
- Global mobility management;
- Work organization and project management;
- Employees shares and purchase plan management;
- Payroll and benefits management;
- Time collection (i.e collection of working hours related to payroll);
- Training plans and trainings management;
- Travel and Expenses management;

## SPEAK UP POLICY

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- Workforce management including internal and external workforce administrative management and HR data management (data updates, organisational chart management, job details changes etc.);
- Occupational health management (i.e management of health data collection in the context of visits to occupational medicine and social medicine, investigation of litigation cases related to occupational disease, management of medical repatriation of expatriates);
- Pension management;
- Provision of IT collaborative tools to staff;
- Crime prevention and detection through CCTV;
- IT access management;
- End-users supports management - Computing management and System integration;
- Information System Security management (i.e detection and remediation of malicious behavior);
- Internal investigations and whistleblowing following complaints or suspected fraud;
- Financial and accounting execution management;
- GDPR management (i.e management of exercise of the rights);
- Innovation activities management;
- Follow-up of the internal customer relationship;
- Suppliers relationship and invoices management;
- Business operations and customers supply management;
- Customers and prospect relationship management;
- Merge & Acquisition management;
- External communication (i.e Q&A management on websites, newsletter communications, management and tracking of access on Solvay's website etc.);
- Internal communication (i.e management of editorial content with personal data, internal newsletters etc.);
- Management of power (KYC);
- Communication with external parties (i.e management of brand promotion and organization of events);
- ISO audit management;
- Lists of insiders (regular and occasional) management;
- Patent registration management (i.e registration of patents and management of intellectual assets protection, payment of complementary retributions (annuities), according to local regulations);
- Quality control management;
- Provision of a platform for information exchange between researchers (ELN);
- Vetting and management of vulnerable roles (i.e to take preventive security measures regarding people with a sensitive role in the company);
- Risk prevention / PPE control;
- Follow up of exposure to dangerous chemicals materials and specific working conditions ;
- Litigation management;
- Management of access control (more specifically to our sites and offices).

### **Who has access to my personal data?**

In the course of our activities and for the same purposes as those listed in this information notice, your personal data can be accessed by or shared internally (e.g. with members of our HR teams, your line manager, managers in the business area in which you are working, internal advisors (e.g. legal

## SPEAK UP POLICY

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department) and IT staff and administrators), including with other entities within the Solvay group. Such access will be limited to strictly authorized personnel on a need to know basis.

Your personal data may also be accessed by and shared with the following categories of recipients to achieve the above purposes:

- third parties who process personal data, such as our IT systems providers, payroll providers, cloud services providers, database providers and security service providers ;
- Syensqo for the processing activities included in the Reverse TSAs ;
- our external advisors, external lawyers, accountants and consultants;
- where applicable, insurance and social security organisations;
- where required by applicable law or at their request, national and/or international regulatory or enforcement bodies or courts , such as judicial courts, arbitrators, mediators, inspection services and tax authorities;
- customers or providers with whom you deal or intend to deal directly or indirectly.

The personal data transferred internally or externally as set out in this section may also be processed in a country outside the European Economic Area ("EEA")<sup>1</sup> not offering an adequate level of personal data protection.

If your personal data is transferred to such a country, we will put in place suitable safeguards to ensure such transfer is legally carried out. You may request additional information in this respect and obtain a copy of the applied safeguard by exercising your rights as set out below.

### **For how long is my personal data stored?**

We will only retain your personal data for as long as necessary to fulfill the purposes for which it is collected and processed or to comply with our legal or regulatory requirements. We will hold your personal data for the duration of your employment, unless overriding legal requirements for a longer or shorter retention period. When this period expires, your personal data shall be destroyed, removed from our systems or anonymized.

### **What are my rights in relation to the processing of my personal data?**

As a data subject, you have a number of rights. Under the conditions and within the limits of the GDPR, you can:

- access and obtain a copy of your personal data on request;
- require that we rectify your inaccurate or incomplete personal data;
- require that we erase or stop processing your data (e.g. where the data is no longer necessary for the purposes of processing);
- require the restriction of your personal data processing;
- request that the personal data you have provided to us be returned to you or transferred to someone else in a structured, commonly used and machine-readable format. The latter right must be exercised in compliance with your confidentiality duties; or

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<sup>1</sup> The EEA covers all EU Member States plus Iceland, Liechtenstein and Norway.

## SPEAK UP POLICY

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- withdraw your consent where we relied on the latter to process personal data (without this withdrawal affecting the lawfulness of processing prior to the withdrawal).

If you would like to exercise any of these rights, please contact the following address: [privacy@solvay.com](mailto:privacy@solvay.com).

In addition, you also have the right - if you believe that we have not complied with your data protection rights - to lodge a complaint with the supervisory authority of the country or region of your usual place of residence, your place of work or the place of the alleged infringement.

### **How do we ensure the protection of my personal data?**

We have implemented adequate technical and organizational measures to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed by unauthorized individuals. Please read our [SOLVAY Privacy policy](#) for more details on the protection of your personal data.

## SPEAK UP POLICY

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### Privacy Policy

#### **Introduction**

Solvay appreciates your interest in its products and services and your visit to our websites. The Solvay Group (“we”) is strongly committed to maintaining your privacy when you visit our websites and we want you to feel comfortable visiting while you visit them. The protection of your privacy and the processing of your personal data is an important concern to which we pay special attention during our business processes. We will do everything possible to guarantee that the data you provide us will remain confidential and that it is used only for the purposes outlined here. The personal data that we collect is processed by us according to the legal provisions valid for the countries in which the websites are maintained. In addition, this privacy policy also covers the processing of customers' and partners' data which is applicable company-wide for Solvay. Solvay's website may include, however, links to other websites which are not covered by this privacy policy. On our end, we strive for the respect of your privacy and your personal data.

This privacy policy (below referred to as “policy”) describes the personal data collected or generated and processed when you use Solvay's websites (below referred to as “websites”). Some examples of such websites might be our corporate website solvay.com, or our local ones solvay.fr and solvay.de. This policy describes the types of personal data collected when you use our websites and how your personal data is used, shared, and protected. It also explains the choices you can make with regards to your personal data and how you can contact us in case of questions, requests, or complaints.

#### **Who is responsible for the processing of your personal data?**

The Solvay entity primarily responsible for the processing of your personal data collected on the website(s) is Solvay S.A.

Solvay S.A. may share your request with the relevant Solvay affiliate(s) of the Solvay Group, who will obey the principles described in this policy and inform you of their identity in due course.

#### **Which information do we collect and when?**

We ask you for certain personal data to provide you with the products or services you request. For example, when you renew an order, request to receive information, create an account, subscribe to our newsletters, or interact with our websites. This personal data includes your:

- Contact details, including your first name, last name, email address, organization, role, telephone number, and physical address;
- Login and account information (if any);
- Other necessary personal details;

You are responsible for ensuring that the personal data you provide is truthful, correct, non-ambiguous, and up-to-date.



## SPEAK UP POLICY

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When interacting with our websites, the data is automatically collected and shared with Solvay by the technology platforms that provide the browsing experience. For example, your web browser or mobile device may share certain data with Solvay as those devices interact with Solvay's websites. More information about these practices is included in our [cookie policy](#). This data includes:

- Device IDs, network access, operating system;
- Cookies, IP addresses, reference headers, data identifying your web browser and version, and web beacons and tags.

### **Why and how do we process your personal data?**

We use the personal data we collect from you in the following ways:

- **To provide the features of the websites you request**

When you use our websites, we will use your data to provide the product or service you have selected. For example, if you make a query on Solvay.com, we will use the contact information you give us to communicate with you about your request. This processing of your personal data will be based on our legitimate interest to send you our communications, or on the basis of it being necessary in order to take steps at your request prior to and when entering into a contract with you, as the case may be.

You can still cancel your subscription at any time of your convenience by clicking on the unsubscribe link placed at each marketing communication received from us.

In many cases, to use particular features within our websites, you may need to provide Solvay with additional data or additional consent to use particular data in a certain way. We will be unable to provide these features if you do not allow us to process your personal data.

- **To communicate information about our products, services, events, and for other promotional purposes**

When you create a Solvay user account, we may use the information you provide as well as information from other Solvay sources, such as your use of Solvay's websites, your visits, and your participation in Solvay events (possibly through other Solvay affiliates) to send you personalized communications on products and services that may be interesting for you. This processing of your personal data will be based on your consent to the use of behavioral and advertising cookies, and our legitimate interest to send you our communications. You will still be able to cancel your subscription at any time of your convenience by clicking on the unsubscribe link placed at each communication received from us.

- **To operate, improve and maintain our business, products, and services**

We may use the data you provide to us to operate our business. For example, when you renew an order, we may use that information for accounting, auditing, and other internal functions. As another example, when you apply for a position at Solvay, we may use data for human resources statistics. This processing of your personal data is performed on the basis of our legitimate interest to operate and improve our business, products, and services.

## SPEAK UP POLICY

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### - For general research and analysis purposes

We use data about how our visitors move around our websites and services to understand the users' behavior and their preferences. For example, we may use information about how visitors on solvay.com search for and find products. We do this to better understand what is the best way to organize such products and showcase our offerings. This processing of your personal data will be based on your consent to the use of the behavioral cookies, as well as on our legitimate interest in analyzing the use of our website where non-cookie technology is used.

### - Other purposes

We may also use your personal data in other ways and will provide specific notice at the time of collection and obtain your consent where necessary.

### Who do we disclose your personal data to?

We may share your personal data with Solvay affiliates for the purposes outlined above in accordance with the information provided at the time of collection of your personal data.

Third-party service providers may also process personal data on Solvay's behalf. For example, to process job applications, for shipments and deliveries, to manage our data, distribute emails, for research and analysis, to manage customer relationships, to manage brand and product promotions as well as to administer certain services and features.

### How do we protect and manage your personal data?

At Solvay, we take the security of your data seriously. The organization has put in place internal policies and controls to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties. Please read [Solvay's data protection policy](#) for more details on how Solvay generally manages personal data. Access to databases or systems holding data about you is restricted to authorized users.

We take appropriate measures to maintain the confidentiality of your personal details. We use a variety of methods to help us to ensure the security of your data and to prevent third parties from viewing them, such as Secure Socket Layer (SSL) encryption, and firewalls.

Where we engage third parties to process personal data, they do so on the basis of written instructions. In fact, they are under a duty of confidentiality and they are obliged to implement appropriate technical and organizational measures to ensure the security of data in order to accomplish their respective missions.

We may disclose your data to third parties (1) To comply with the law requiring such disclosure; (2) to protect the personal safety of the public and the users; (3) to protect national security; (4) to enforce our rights in litigations or investigations; (5) to prevent a crime.

### International data transfers

The personal data we collect or generate in the context of our websites will essentially be stored in the EU. However, some of the data recipients with whom Solvay shares your personal data may be located in countries other than the country in which your personal data originally was collected. The

## **SPEAK UP POLICY**

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laws in those countries may not provide the same level of data protection compared to the country in which you initially provided your data. Nevertheless, when we transfer your personal data to recipients in other countries, including the USA, we will protect that information as described in this policy and in compliance with the applicable laws.

If you are located in the European Economic Area (“EEA”) or Switzerland, we take measures to comply with applicable legal requirements and ensure adequate protection for the transfer of personal data to recipients in countries outside of the EEA or Switzerland, for instance through data transfer agreements based on the EU Commission’s model clauses.

### **Retention of your data**

We retain your personal data for as long as necessary to fulfill the purposes for which we collect it, except if required otherwise by law. Depending on the purpose, the period for which we retain your personal data may vary. To provide the features of the websites you request, we may keep your personal data for as long as needed to provide the service you requested, and for no longer than the applicable statute of limitations thereafter. We will retain your personal data until you withdraw your consent or for a maximum duration of three years after our last contact with you or the end of our contract with you for the purpose of communicating information about our products, services, events, and for other promotional purposes. Personal data used to operate, improve and maintain our business, products and services may be retained for the duration of the provision of the products or services, and for no longer than the applicable statute of limitations thereafter. We will retain your personal data for no longer than three years starting from the date of its collection for general research and analysis purposes.

### **Are you allowed to access, modify or erase your personal data?**

You have the right to access, modify, erase, request the restriction or oppose the processing of your personal information or request the portability of the personal data you contributed, without any expenses and at any moment, and you may request from us to erase your personal data on your behalf. Where the collection and processing of your personal data are based on your consent, you have the right to withdraw your consent with respect to our use of your personal data.

You also have the right to lodge a complaint with a competent supervisory authority.

We are not responsible for third parties who have had access to your data from any other source other than our database, including if they do not suppress your details from their databases.

We do not guarantee that our services will be available continuously. In case of an interruption of service, we are not responsible for the possible loss of your personal data.

We reserve the right to erase your details without your consent and we are not responsible for the possible loss or suppression of your personal data.

To opt out from receiving Solvay's communication, please click on “unsubscribe” at the bottom of one of our emails.

## SPEAK UP POLICY

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You can contact us to exercise your rights via the contact details in the “Questions and feedback” section below or by sending an email to [privacy@solway.com](mailto:privacy@solway.com).

### **Email marketing program**

Solvay uses Pardot, the marketing automation platform provided by Salesforce.com Inc., which scores visitors' and potential clients' activities on landing pages and on the website by setting advertising cookies on their browsers. When you give your consent to join our marketing program, Pardot adds data to your user profile, based on the preferences and tastes you have shown while browsing our websites, reading emails, and downloading educational materials. In this way, we are able to better support the product selection process.

Pardot tracks visitor and prospect activities on solvay.com and Pardot landing pages by setting cookies on your browser upon your prior consent. These cookies are set to remember preferences (like form field values) when you return to our site. Pardot also sets a cookie for logged-in users to maintain the session and remember table filters. [For additional information](#) regarding cookies, please consult our [cookie policy](#).

You may opt out of this marketing program at any time by visiting [this unsubscribe page](#) and submitting your email address.

### **Using Solvay websites with third-parties**

Our websites allow you to interact with a wide variety of other digital products and services. For example, our websites can integrate with third-party platforms to improve your overall digital experience. Your privacy rights on third-party platforms will be governed by their respective policies.

The policies of those platforms govern the data that resides there.

Our websites may provide links to other (third-party) websites and apps for your convenience or information. Linked sites and apps have their own privacy notices or policies, which we strongly encourage you to review. To the extent any linked websites or apps are not owned or controlled by us, we are not responsible for their content, any use of the websites, or the privacy practices of the websites.

### **Children**

Solvay does not knowingly collect personal data from children without insisting that they seek prior parental consent if required by applicable law.

### **Changes to Solvay's privacy policy**

Applicable law and our practices change over time. If we decide to update our Policy, we will post the newest version on our websites. We strongly encourage you to read our Policy and regularly check for any changes.

### **Questions and feedback**

If you have any questions, remarks, or suggestions about this privacy statement and the practices of our websites, please contact Solvay's Data Protection and Privacy Office who will redirect you, if

## SPEAK UP POLICY

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applicable according to local legal requirements, to the Data Protection Officer in your country. To do so, you can send us an email at [privacy@solvay.com](mailto:privacy@solvay.com).