SOLVAY

SUSTAINABLE PROCUREMENT POLICY

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1 Purpose

At Procurement, we integrate Solvay Corporate Social Responsibility (CSR) principles and Group's Sustainability ambition into our processes and strategies in order to create sustainable business value with our suppliers.

This policy aims at documenting the defined sustainable procurement practices and integrating them into our end to end procurement activities such as sourcing (tender management, supplier selection,etc), supplier performance evaluation and risk management.

Solvay's Sustainability Procurement objectives are:

- Compliance with all relevant legislations and regulatory requirements;
- Integration of sustainability criteria in the sourcing process;
- Use of the developed measures to monitor suppliers Sustainability performance;
- Promotion of Solvay's ambition on Sustainability among suppliers, contractors and within the Procurement community.

2 Scope

This policy applies to all Solvay Procurement activities (i.e. to all Categories and GBUs) and provides the minimum requirements to comply with.

3 Definitions & Acronyms

3.1 Definitions

- **Core suppliers**: a Core Supplier is either a Strategic Alliance[1], a Strategic Partner[2] or a Bottleneck[3] supplier.
- **Regular Suppliers**: all suppliers, except for the Core Suppliers
- **Category**: A Category is a group of similar goods or services purchased by Solvay, classified in a hierarchical matrix, the so-called "segmentation"

- Categories are grouped into the following families:

1	GE	General expenses
2	IT	Information Technologies & Telecommunications
3	LOG	Logistics
4	PACK	Packaging
5	TG	Technical Goods
6	TS	Technical Services

[1] Strategic Alliance represents a supplier typically multi-GBU with high potential impact on contribution margin and significant spend at group level with a strategic reciprocity and potential interest in innovation.
[2] Strategic Partner represents a supplier delivering strategic and critical materials or services, critical for business continuity. Regular review on the long term relationship to maintain adequate quality of services.
[3] Bottleneck supplier represents a supplier in a potential risk to Solvay such as sole source suppliers or transportation of dangerous goods.

7	RM	Raw Materials
8	EN	Energy

Within the Procurement Function, Domain Directors are responsible for the following combinations of Domains:

- TG/TS (CAPEX)
- GENEX, IT & Telecom
- Logistics & Packaging

3.2 Acronyms

- CAPEX: Capital Expenditures
- CPO: Chief Procurement Officer
- CSR: Corporate Social Responsibility
- ESG: Environmental, Social and Governance
- GBS: Global Business Services
- GBU: Global Business Unit
- LT: Leadership Team
- SPP: Solvay Procurement Process
- TfS: Together for Sustainability

4 Governance & Process

4.1 Category Strategy

Category Strategy (CS) is a systematic approach to identify how to realise significant improvements and to define a mid to long term guideline to maximise value creation within the Category.

When defining Category Strategies, the Cross Functional teams led by Procurement integrate ESG and sustainability objectives and identify key initiatives to pursue.

A detailed methodology has been developed (called Category Strategy Methodology) to support Category Leads. This methodology is part of the Procurement Academy.

4.2 Source to Contract

Sustainability and ESG elements need to be integrated in the different activities taking place when Sourcing and Contracting with suppliers and third parties, called ‘Source to Contract’.

The minimum and mandatory requirements to be applied are listed below:

4.2.1 Suppliers’ selection

Suppliers’ selection process should consider both financial and non-financial criteria such as Environmental, Social and Governance (ESG).

To support suppliers’ selection, Procurement and Business stakeholders use a Sourcing Decision Grid, also known as Supplier evaluation matrix, that should at minimum include the 5 axes below:

- **Competitiveness:** Purchasing Cost, Working Capital effect, TCO

- **Quality:** Supplier Management System, Quality of Product and Service proposed
- **Supply Risk:** Financial Risk, Country Risk, Legal Risk (Contract Complexity / Reliability of Supplier, Legal and Knowledge & Technology), etc
- **ESG:** Environmental, Social, and Governance. This is a mandatory element to take into account.
- **Innovation & Strategic Fit:** Strategic Fit, Level of Interaction / Influence on the supplier, Geo Fit, Innovation R&D Capability

ESG considerations are of utmost importance in the supplier selection process. Therefore, it is highly advised to assign at minimum a 10% weight to ESG factors in the sourcing decision grid.

The ESG performance of a supplier can be measured through below assessments:
- A third party assessment, such as an Ecovadis assessment, or a Together for Sustainability (TfS) audit or any other valid alternative
- Solvay CSR questionnaire[4]

4.2.2 Solvay Supplier Code of Business Integrity (SCoBI)

In doing business with Solvay, suppliers must comply with Solvay Supplier Code of Business Integrity (SCoBI).

When contracts are set up, the SCoBI should be included in the contractual documentation, using the defined standard clauses and templates. Signed contracts, including the SCoBI should be stored in Solvay Contract Management system.

In addition to this, all Purchase Orders include Procurement General Terms and Conditions which refer to Solvay Supplier Code of Business Integrity.

In case the supplier does not accept to refer to Solvay's SCoBI and refers to its own Code of (Business) Conduct, specific checks must be performed by Solvay Procurement Sustainability team to confirm that such code is based on principles similar to the ones of our Supplier Code of Business Integrity.

Solvay's Supplier Code of Business Integrity is a public document available on Solvay's website.

4.2.3 Solvay Policy on Conflict Minerals

Consistent with Solvay's Supplier Code of Business Integrity, Solvay also requires the cooperation of its suppliers in the implementation of Solvay Policy on Conflict Minerals[5]. As part of that process, Solvay conducts due diligence concerning the necessary conflict minerals in the products it manufactures or contracts to manufacture in accordance with the Organisation for Economic Co-operation and Development's Due Diligence Guidance for

[4] CSR Questionnaire represents for Corporate Social Responsible Questionnaire
[5] The minerals, including tin, tantalum, tungsten and gold from conflict-affected and high-risk areas, are commonly referred to as "3TG" or "conflict minerals"

Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the "OECD Guidance").

In the same context, Regulation (EU) 2017/821 on the responsible sourcing of minerals requires European suppliers/importers of tin, tantalum, tungsten and gold (3TG) to source minerals sustainably and responsibly so as not to inadvertently contribute to armed conflict and human rights violations.

4.2.4. Product Safety

Solvay is committed to sourcing products that comply with all applicable safety and regulatory requirements and for which the classification is clearly defined.

Solvay expects suppliers to adhere to the highest industry standards and put in place measures that secure conformity with all laws and regulations governing the human and environmental safety of the products supplied to Solvay (including but not limited to Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, the US Toxic Substances Control Act).

Solvay suppliers are therefore required to provide Solvay with products that conform to the applicable product safety legal requirements, and share with Solvay all relevant information (including labels and Safety Data Sheets) that is updated, reflects the actual composition and properties, and can allow Solvay to define the classification and safe handling and use of its own products. This applies in particular to products that contain molecules meeting the definition of Substance of Very High Concern (SVHC) and Substance of Concern (SoC). Changes to all relevant information should be promptly communicated to Solvay.

4.2.5. Deforestation (EUDR)

Solvay is committed to conducting thorough due diligence on all commodities covered by the Deforestation Regulation (EU) 2023/1115 (EUDR), ensuring they are deforestation-free or not subject to forest degradation and produced in accordance with the EUDR, applicable laws and regulations, and international standards such as ISO 20400 and the UN Global Compact.

Solvay expects its suppliers to demonstrate compliance through robust due diligence systems and will actively engage with them to assist in meeting their EUDR obligations through knowledge sharing, capacity building, and joint risk assessments. Solvay will continuously monitor and evaluate the effectiveness of its EUDR compliance measures and strive for continuous improvement in its supply chains.

4.3 Breaches against the policy – Solvay Supplier Speak Up

Integrity is non-negotiable at Solvay. In this context, the Group fosters an environment where suppliers and partners can feel confident and comfortable speaking up when witnessing suspected violations or concerns that go against Solvay's ethics and compliance standards through the Solvay Ethics Helpline. Every report will be carefully reviewed by the Ethics & Compliance team who will conduct an investigation as appropriate.

Procurement team members should promote the existence of the Solvay Speak Up process towards suppliers, to ensure that any potential suspected violation or breach they identify can be reported.

4.4 ESG assessment of Core Suppliers

While core suppliers are key to the business, they can also be vulnerable to various risks (environmental risk, health and social concerns, human rights and governance/politics) that could potentially impact their performance and, consequently, our operations.

All core suppliers are required to perform a third party ESG assessment to evaluate their sustainability performance. Recognized Third Party Alternatives (TPA) for ESG assessments are listed in chapter 4.6.

In case a core supplier systematically refuses to perform any ESG assessments, this must be escalated to the Procurement LT Team member in charge of the category or the region, and then reported to CPO for further actions (e.g. a strategic consideration will be made to explore alternative supplier options).

4.5 Supplier ESG Risk Management

Solvay has also developed an ESG risk management approach for its supply chain. The aim is to comply with the existing and upcoming ESG regulations, especially on environment and human rights (e.g. EU Mandatory Human Rights and Environmental Due Diligence Legislation).

This requires corporate governance practices to better integrate risk management and risk mitigation in their processes.

The policy for ESG Risk Management (Build and maintain overall ESG Risk matrix & Supplier risk management) provides a systematic approach for risk identification and risk severity assessment and triggers risk mitigation action plans.

In addition to the internal risk management framework, Solvay has also incorporated a third-party risk management tool for adverse media screening on

- Environmental Social and Governance
- Anti-bribery & Corruption
- Human Rights

4.6 Overview of sustainability performance evaluation practices

ESG third party assessments are requested from sourcing to performance review for all core suppliers and suppliers identified through ESG risk management. Below more specific information on each of the existing third party assessments.

4.6.1 Third Party assessment - EcoVadis Assessment

Solvay is a founding member of Together for Sustainability (TfS). TfS sustainability performance assessments are carried out by the initiative's key partner and specialised service provider "**EcoVadis**".

TfS uses the services of EcoVadis for the external assessment of suppliers via an e-platform. The standard assessment performed on the platform makes use of a questionnaire containing questions adapted to the business sector of the supplier being reviewed. The assessment is usually performed at corporate level while it can cover all its subsidiaries. After review of the answers provided by the supplier as well as the supporting documents, EcoVadis publishes a score on the platform.

The EcoVadis assessment is valid for 1 year. If the score is below 54, a Corrective Action Plan is launched. If the score is below 30 on the Human Rights section of the assessment, a TfS audit is launched (see 4.6.2).

In line with TfS recommendations, Solvay recognizes the following certifications and audit framework as valid alternatives:

- Safety and Quality Assessment for Sustainability (SQAS)
- Responsible Care (RCMS/RC14001)
- Sedex Members Ethical Trade Audit (SMETA)
- PSCI Audit
- CRSAS

4.6.2 Third Party assessment - Together for Sustainability audit

TfS also offers the possibility to request a sustainability audit. TfS has selected certain audit companies to perform sustainability audits according to TfS protocol - more information can be found in this link.

A TfS audit is an onsite inspection of a specific supplier legal entity (e.g. production site, warehouse etc.) based on an audit-reporting template developed by TfS. The validity period is 3 years. In case of major or critical findings, a follow up audit needs to take place, preferably within the following 12 months.

4.6.3 Solvay CSR Questionnaire

Solvay has developed a Corporate Social Responsibility Questionnaire (CSR Questionnaire). When abovementioned third party assessments cannot be carried out by the suppliers, the buyer must use the Solvay CSR questionnaire at the sourcing stage and for performance evaluations.

5 Document lifecycle

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