

Global Policy - Environmental Management

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1. Context

Pollution, water consumption and waste management have been identified as material topics for the Solvay Group in the Double Materiality Assessment (DMA). The Environmental Management policy aims at describing Solvay's Strategy and Governance to manage the material impacts (including those that exercise pressures on biodiversity), risks and opportunities (IROs) related to emissions, SoCs, SVHC, waste and water consumption. It is fully embedded in Solvay's Sustainability ambition.

This policy is a part of a set of policies defined by Solvay under the umbrella Sustainability Policy where the overarching ambition, strategy, governance and communication are described.

2. Scope

This policy applies worldwide to all businesses in which the SOLVAY Group has an operational control.

The perimeter of this policy is for active sites only.

The management of closed sites is done separately and reported separately by the remediation team, which is part of the HEPS department. The valorization of the rehabilitated sites is managed by the Real Estate team, which is also part of the HEPS department.

3. Commitments

It is a minimum requirement that all SOLVAY operations comply with all relevant environmental laws and regulations.

SOLVAY's Health, Safety, and Environment (HSE) management system is aligned with ISO 45001 and ISO 14001 definitions and with our Responsible Care Policy. Through these standards, we commit to safeguarding people, communities and the environment, by continuously improving our environmental, health and safety performance, the security of our facilities, processes, technologies, and chemical product safety and stewardship throughout the supply chain. This reflects Solvay's position as a signatory to the International Council of Chemical Associations ICCA's Responsible Care Global Charter®.

We strive to deliver continuous improvements reducing pressures on biodiversity, across all activities in all locations, and we work with local communities and stakeholders to be a responsible neighbor. We rely on our STAR Factory program, it provides a framework to efficiently implement our improvements across our sites and prioritize resources to support.

Pollution (Perimeter: WW)

Target: Always meeting our compliance obligations, we proactively seek to go beyond, to reduce emissions of substances of concern for the environment.

It is a minimum requirement that all SOLVAY operations comply with local regulations, limits and measures, federal environmental laws, US EPA Effluent Guidelines, China's Pollutant Discharge

Permit System, EU action plans and directives such as the Industrial Emissions Directive (IED) and the Water Framework Directive (WFD).

Monitoring:

- We monitor air, water, and soil quality regularly to identify pollution hotspots and areas needing remediation.
- We conduct a comprehensive assessment of current pollution sources, including air, water, and soil.

Mitigation:

- We mitigate negative impacts related to pollution of air, water and soil including prevention and control.
- We implement pollution control technologies and practices to minimize emissions of pollutants into the environment.
- We invest in cleaner production methods and technologies to reduce pollution at the source.

SVHC and SoC:

- We identify substances of very high concern (SVHC) and substances of concern (SoC)
- We run Solvay Substances Risk Monitoring to update risk studies and strive to substitute them when possible with safer equivalent alternatives

Procedures:

- We provide training for employees in pollution prevention techniques and best practices.
- We maintain a robust emergency response program focused on safety to effectively address any incidents or accidents that may occur, prioritizing the protection of human health, the environment, and surrounding communities.
- We develop and enforce procedures for handling and disposing of hazardous substances to prevent pollution.
- We ensure the compliance, effectiveness and reliability of pollution treatment equipment before discharge.

Water withdrawal (Perimeter: sites subject to water stress)

Target: We aim at reducing freshwater withdrawal in areas subject to water stress.

Sites in areas subject to water stress horizon 2030 were identified through a robust two-step water risk assessment. First, a basin-level screening evaluated all global sites for external physical risks (such as water scarcity, quality and accessibility). Second, an operational risk assessment analysed site-level management practices and infrastructure resilience.

The list of concerned sites is in Appendix I. It is reviewed regularly.

Monitoring:

- We monitor water usage and withdrawal rates regularly to identify inefficiencies and areas needing improvement.
- We conduct water risk assessments and develop measures periodically.

- We conduct a comprehensive assessment of current (fresh)water consumption and withdrawal sources.

Mitigation:

- We implement water conservation technologies and practices to minimize water withdrawal and optimize the use of water resources.
- We implement management systems to treat and prevent the contamination of water bodies and marine ecosystems.
- We implement water recycling and reuse systems to minimize freshwater withdrawal and reduce the strain on water bodies and aquatic ecosystems.
- We invest in sustainable production methods and technologies to reduce water consumption, thereby preserving water availability and marine water quality.

Procedures:

- We provide training for employees in water conservation techniques and best practices to ensure responsible management of water resources.
- We promote water-saving initiatives to minimize water consumption and enhance sustainability.
- We develop and enforce procedures for the efficient use and management of water to prevent overuse and ensure sustainable supply.

Investment projects:

The profitability of all investment projects factors an internal price for water in order to assess the projects including the negative externalities or potential future water cost.

Four different prices of water have been defined depending on water stress (standard or high) and water usage:

- Cooling water: Water taken from one source and given back to the same source with potential temperature increase
- Process water: All non "cooling water" intake

Internal price €/m ³	Standard stress	High stress
Cooling water	0.5	1
Process water	3	8

These internal reference prices are applied during the project lifetime for sites in areas at water stress.

Waste management (Perimeter: WW)

Target: We aim at reducing the amount of waste and the hazardousness of the waste we produce. We aim at valorizing as much as we can the waste we can not avoid.

Monitoring:

- We monitor resource usage and waste generation regularly to identify areas for improvement and implement strategies for resource optimization and waste reduction.
- We conduct a comprehensive assessment of current resource usage patterns, including materials and waste generation.

Mitigation:

- We implement resource-efficient technologies and practices for the efficient handling and management of resources to minimize waste generation and optimize resource utilization.
- We implement systems for efficient resource recovery and recycling to minimize waste generation and promote the circular use of materials.
- We regularly evaluate and prioritize the possibility of using recycled or bio-based materials as raw materials.
- We invest in sustainable production methods and technologies to enhance resource efficiency and promote a circular economy model.

Procedures:

- We provide training for employees in resource efficiency techniques and circular economy principles to foster a culture of sustainable resource management.
- We maintain a reactive response program to effectively manage and mitigate any incidents or disruptions related to resource availability and waste management.
- We promote recycling and waste reduction initiatives to minimize the generation of hazardous and non-hazardous waste.
- We promote circular economy principles and initiatives to minimize resource consumption, maximize resource reuse and recycling, and reduce reliance on virgin materials.

4. Responsibilities

Implementation

All managers, leaders, and their own workforce are responsible for applying this policy by deploying procedures, rules and processes accordingly.

Solvay site managers are responsible to apply this policy and implement the Group procedures in their sites.

The HEPS team, through its Sustainable Environment department, enforces the policy implementation through its day-to-day operational oversight, supported by Correspondents at each GBU and operational site.

Policy validation and review

The Executive Leadership Team (ELT) holds ultimate responsibility for the validation and adoption of this policy. As outlined in the company's Sustainability Policy, the ELT ensures that the policy aligns with the organization's strategic goals and stakeholder expectations.

This policy will be reviewed regularly by the HEPS team to ensure its effectiveness and relevance.

Log Change:

Rv Number	Date	Description of Change
Version 02	January, 21 st 2026	Water section updated: <ul style="list-style-type: none"> • Water consumption changed to water withdrawal • Water scarcity changed to water stress • New methodology to identify priority sites • Updated list of priority sites
Version 01	December, 11 th 2024	Creation

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Document owner: Christophe Roger, HEPS Director

Document reviewer: Lanny Duvall, Chief Operation Officer

Document approver: ELT

1. Appendix

List of sites located in areas of water scarcity horizon 2030

Site	Country	GBU
Bernburg	Germany	Soda Ash/Peroxides
Devnya	Bulgaria	Soda Ash
Dombasle	France	Soda Ash
Epe	Germany	Soda Ash
Green River	United States	Soda Ash
Rosignano	Italy	Soda Ash/Peroxides
Asia Industrial Estate	Thailand	Peroxides
Banksmeadow	Australia	Peroxides
Livorno	Italy	Silica
Qingdao	China	Silica
Ciudad Juarez	Mexico	Special Chem
La Rochelle	France	Special Chem
Liyang	China	Special Chem

List of SOLVAY's procedures:

- HSE GEN IND-HSE-01.01-PRO Reporting of HSE Events
- HSE GEN IND-HSE-01-PRO HSE Reporting
- HSE GEN IND-HSE-02-PRO Crisis Alert Procedure
- HSE GEN IND-HSE-04-PRO HSE Compliance Audits
- HSE GEN IND-HSE-05-PRO HSE Audit Process Manual
- HSE GEN IND-HSE-06-PRO HSE Reviews and Assessment of Investment Projects Group Requirements
- IH IND-HSE-70-PRO Chemical Hazard Communication
- ENV IND-HSE-ENV-01-PRO Group Reporting for SERF Reporting
- ENV IND-HSE-ENV-10-PRO HSE Waste Management
- IH IND-HSE-IH-03-PRO Local Exhaust Ventilation (LEV)
- IH IND-HSE-IH-05-PRO Group Requirements for Chemical Risk Assessment and Management
- TS IND-HSE-TS-02-PRO Transport Emergency Response
- PU-5204-P-WW-EN - Sustainable Procurement - Responsible supply chain policy