

Nouryon Conflict Minerals Policy

June 2023

Why do we have this Policy?

Nouryon is committed to corporate social responsibility, including promoting responsible sourcing practices and respecting human rights in its operations and its global supply chain. This Policy includes Nouryon's commitment to the responsible sourcing of tin, tantalum, tungsten, and gold ("Conflict Minerals"). Sales of these Conflict Minerals have been found to carry a risk of directly or indirectly financing or benefiting armed groups in the Democratic Republic of Congo and adjoining countries ("Covered Countries").

Who must comply with this Policy?

To aid our compliance and our efforts in the responsible sourcing of Conflict Minerals, Nouryon adopted our [Business Partner Code of Conduct](#) ("Partner Code") which establishes expectations for business partners, including suppliers. Nouryon expects its business partners to comply with, and cooperate in Nouryon's compliance with, responsible sourcing practices and applicable laws and regulations.

How does Nouryon promote the responsible sourcing of Conflict Minerals?

Nouryon conducts a periodic review of our product categories and product specifications in which any Conflict Minerals are, or may be, incorporated.

For any product identified to contain Conflict Minerals, a reasonable country of origin inquiry is conducted on those Conflict Minerals to determine whether they were sourced directly from the Covered Countries rather than originating from recycled or scrap sources.

In addition, we require suppliers of Conflict Minerals used in our products to provide information regarding the smelters of those minerals. We evaluate the responses received and conduct additional follow-up with the suppliers where necessary. We review information provided by the Responsible Minerals Initiative, regarding smelter status to help verify that materials have been responsibly sourced. The Responsible Minerals Initiative is a not-for-profit organization that provides companies with tools and resources to make sourcing decisions that improve regulatory compliance and support responsible sourcing of minerals from conflict-affected and high-risk areas.

Nouryon's Procurement function reports any Conflict Minerals findings to the Chief Compliance Officer, and outlines the information gathered and the actual and potential risks identified.

How is this Policy implemented?

Under the guidance of the Chief Compliance Officer, the Procurement function is responsible for the implementation of this Policy across Nouryon's supplier portfolio. Procurement conducts supply chain due diligence and reports findings to the Chief Compliance Officer, who is responsible for overseeing periodic risk assessments and providing guidance on any required follow-up actions.

What are the consequences if a Supplier is determined to be out of compliance?

This Policy, along with Nouryon's Business Partner Code of Conduct, are integral parts of the Company's compliance program. If a supplier is found to be non-compliant or fails to take reasonable corrective actions, Nouryon will evaluate available remedies, including discontinuing purchases from the supplier.

Any questions or concerns about this Policy can be sent to Nouryon's Compliance team by emailing nouryoncompliance@nouryon.com or via regular mail to:

Nouryon
Attn: Chief Compliance Officer
100 Matsonford Road
Building 1, Suite 500
Radnor, PA 19087
United States of America

#