

Animal Testing Policy

9 July 2021

Why do we have this policy?

Nouryon, as a leading manufacturer of specialty chemicals, considers the safeguarding of our workforce, customers, and the environment to be of paramount importance. Our strong safety culture and commitment to our people requires that we fully understand the potential hazards of our raw materials, intermediates, and final products. In some cases, the only way to predict potential hazards or comply with legislation is by undertaking studies with vertebrate animals. This policy serves as guidance in these cases.

Who must comply with this policy?

All Nouryon employees.
(Expectations for suppliers are covered by the Nouryon Business Partner Code of Conduct).

What is our approach to animal testing?

When animal testing is required, Nouryon fully supports and applies the principles of the “3Rs” to *Replace*, *Reduce*, and *Refine* animal testing.

- Nouryon does not routinely carry out animal research on finished products, such as chemical mixtures, except in those exceptional cases where required by government regulations.
- When evaluating the hazard of a substance, first a rigorous assessment of existing information should be performed and appropriate data generated by means which do not involve the use of vertebrate animals, such as computer modeling or in vitro assays.
- When animal testing cannot be avoided, responsible testing on vertebrate animals is performed by accredited testing laboratories.

Nouryon will continue its strategy of minimizing animal testing by supporting the development of non-animal research or animal reduction research protocols. Nouryon will also continue the dialogue with institutes and regulatory bodies to minimize the need for animal testing.

Process and criteria

All proposals for vertebrate animal testing have to be assessed by the Nouryon Product Safety and Regulatory Affairs (PSRA) group prior to the commissioning of each study.

The assessment will be done by a group of senior (eco)toxicologists taking into account the need for the proposed testing, the suitability of the test protocol, and to determine the possibility of using alternative, non-animal research techniques.

Any requests for a re-assessment of a testing proposal or any exemption to this Policy are to be approved by the Executive Vice President and General Counsel.

Details for the review process are set out in Nouryon's Animal Testing Guidance Note.

What should I do if I think that the policy may have been violated?

To raise a concern or report a potential violation of this Policy, or any related policy or guidance, you should reach out to the appropriate Company resource, which, depending on the situation, could be your manager, HR, Compliance (nouryoncompliance@nouryon.com) or Legal.

You may also report policy violations or other unethical conduct through Nouryon's confidential reporting system, SpeakUp! which can be accessed at nouryon.ethicspoint.com or by referencing any of the toll-free numbers listed on the SpeakUp! website.

Reports made through SpeakUp! can usually be anonymous and will be kept confidential to the greatest extent possible. Nouryon strictly prohibits retaliation against employees who make good faith reports of policy violations or inappropriate behavior.

What are the consequences of violating this policy?

This policy, along with Nouryon's Code of Business Conduct and Ethics are integral parts of the Company's compliance program. Any violations of these policies or any related guidance or procedures may result in disciplinary action, including termination.