

Clariant Group Human Rights Policy

Number	PLCY-3000176
Revision No.	2
Effective Date	24 Sep 2025
Release Date	24 Sep 2025
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Lifecycle	GF SA
Location	Global
Folder	SA

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1. Introduction and Scope

Clariant has a broad and dynamic heritage of various company cultures and operates with a continuous strive for excellence and high performance in a highly dynamic and challenging business environment.

At Clariant, we believe that we can only be successful if all our employees and stakeholders are treated with dignity and respect.

Our commitment to Human Rights is most important to Clariant. The principles of the Universal Declaration of Human Rights are more relevant today than ever before in the face of global political and economic volatility. Human Rights abuses of any kind are unacceptable.

We recognize our responsibility to promote respect for Human Rights within our company, for our employees, throughout our value chain and for the communities in which we operate. At Clariant, we see Human Rights as one of the core elements of the social dimension within our ESG-activities. Sustainability is one of the four key pillars supporting Clariant's purpose: Greater Chemistry – between people and planet and links to our objective of Social Value Creation.

Our Human Rights Policy outlines the core Human Rights standards and expectations we have established for our employees, suppliers and business partners. This Policy is applicable to Clariant AG and all Clariant Group companies which Clariant AG directly or indirectly controls, in particular by shareholding of more than 50% or majority of voting rights or other rights to direct management ("Clariant"). In joint ventures where we are a minority shareholder or do not have direct management rights, we aim to work together with our partners to respect internationally recognized Human Rights standards.

Our commitment to Human Rights is part of our Code of Ethics and our Sustainability Policy, outlining Clariant's social, environmental and economic commitment, transitioning to a more sustainable and equitable world. It is also embedded in our Supplier Code of Ethics, and we expect our suppliers¹ and business partners to adhere to the standards set out in this Policy.

2. Our Commitment

Clariant is committed to promoting respect for Human Rights of all people we interact with, be it directly as part of our own operations or indirectly throughout our value chain. We deploy our best efforts to ensure that in all our activities and business relationships the Human Rights of all persons are respected, as expressed in internationally recognized Human Rights standards, notably:

- the International Bill of Human Rights
- the International Labor Organization's Declaration on Fundamental Principles and Rights at Work

Our approach to upholding this commitment is guided by the following frameworks:

- the UN Guiding Principles on Business and Human Rights
- the Ten Principles of the UN Global Compact
- the OECD Due Diligence Guidance for Responsible Business Conduct
- the Responsible Care ® Global Charter

¹ In line with our Supplier Code of Ethics, supplier refers to any third party providing any type of good, raw material, technology or service to Clariant.

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3. Human Rights Standards

Clariant requires compliance with all applicable international, national and local laws and regulations. Our standards are based on recognized international Human Rights standards and reflect the Human Rights issues that are most relevant to our activities. Our respect for Human Rights is not limited to these standards and we recognize that additional issues may be relevant depending on context.

In cases where national law and international Human Rights standards are incompatible, we comply with national law and seek ways to honor the principles of international Human Rights standards to the greatest extent possible.

3.1. Child Labor

We prohibit the use of child labor in our operations and supply chain in line with Convention 138 (Minimum Age) and Convention 182 (Worst Forms of Child Labor) of the International Labor Organization. We prohibit the hiring of individuals under the legal minimum age for employment or compulsory school age, whichever is higher. Young workers (those above the legal working age but below 18 years of age) may be employed under Clariant-approved short-term internships, apprenticeships or work experience programs, but must never perform work that could jeopardize their health and safety or interfere with their education. We require that the age of our employees be verified at the time of hire. Likewise, and as stated in our Supplier Code of Ethics, we also expect our suppliers to adhere to relevant international standards and avoid all use of child labor.

3.2. Forced Labor

Clariant prohibits all forms of forced labor, this includes slave labor, military labor, debt bondage, involuntary prison labor and any form of human trafficking. No employee shall be forced to work or subjected to corporal punishment, threats of violence or other forms of physical, sexual, psychological or verbal abuse as a method of discipline or control. All employees must be provided with a written employment document (e.g., offer letter, contract, etc.) that clearly states the terms and conditions of employment (e.g., hours of work, compensation, benefits, etc.) in a language that the employee understands and that is explained verbally as needed. All employment documents must be agreed upon and signed in writing by employees and their employers. As stated in our Supplier Code of Ethics, we expect our suppliers to adhere to the same standards and do not accept any form of forced labor, including modern slavery and human trafficking, in our supply chain.

3.3. Harassment and Discrimination

We value diversity, are committed to equal opportunity and do not tolerate any form of discrimination and harassment. This includes harassment or discrimination based on ethnicity, color, age, sex or gender, intersex, sexual orientation, gender identity, gender expression, transgender status, religion, creed, national origin, ethnicity, citizenship, ancestry, disability, genetic information, military or veteran status, pregnancy, marital or family status or any other protected category under applicable law. Harassment or discrimination against Clariant employees, applicants and third parties, including customers, visitors or Clariant vendors is prohibited. We expect our suppliers to share our commitment to diversity, equity and inclusion, including the prohibition of any forms of discrimination and harassment.

3.4. Freedom of Association and Collective Bargaining

We respect workers' right to join or form an organization of their choosing, such as a trade union, and to bargain collectively and expect the same of our suppliers. We prohibit any form of intimidation, harassment, retaliation or violence against union members, union representatives and against any employees who seek to exercise these rights. We are committed to constructive dialogue and good faith bargaining with legally recognized trade unions, works councils and

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similar employee representative bodies and with their freely elected representatives. Where the right to freedom of association is restricted by law, we support the development of alternative mechanisms for engagement in accordance with local laws.

3.5. Wages and Benefits

We are committed to paying fair wages to all our employees, providing a decent standard of living. Clariant strives to offer benefits that support employees and their families in their professional and/or private life. Clariant compensates its employees competitively by industry and local standards. Our remuneration practices and policies always follow all applicable local regulations governing the payment of wages and benefits. All employees must receive wages that meet or exceed the legal minimum wage and/or agreements with employee representative bodies. Overtime must be paid at the appropriate premium rates in accordance with local laws, and all wages must be paid on time and in full. For each pay period, all employees must receive a remuneration statement that clearly shows the components of their compensation, including hours worked, benefits received and all deductions. Clariant requires that all deductions be made in accordance with local laws. When it comes to our suppliers, we expect them to pursue a fair remuneration policy that complies, at a minimum, with all local applicable working hours and wage laws, minimum wages, overtime wages, and mandated benefit requirements.

3.6. Working Hours

We have established guidelines for employee work, overtime and rest hours in our business operations and supply chain as we recognize the importance of work-life balance. Clariant strives to comply with international standards regarding work and rest hours, which provide for (i) a standard workweek of no more than 60 hours (48 regularly scheduled hours and 12 voluntary overtime hours), (ii) at least 8 hours of rest between workdays, and (iii) at least 24 hours of uninterrupted rest in each seven-day period, except in emergencies or unusual situations. In any case Clariant adheres to local laws and agreements with employee representative bodies which may provide for more stringent requirements. Likewise, we expect our suppliers to comply with applicable laws and collective agreements.

3.7. Health and Safety

Protecting the safety, health and well-being of our employees as well as the communities within which we operate is one of our top priorities. We have policies and procedures in place to promote health and safety values throughout our company. These include EHS Guidelines and Guides that set standards to maintain an injury-free workplace as well as creating a positive health and well-being culture. We are committed to creating and sustaining a safe and healthy workforce by engaging with employees on hazard identification and implementation of risk control measures. We expect our suppliers to apply internationally accepted standards such as the ISO Occupational, Health and Safety Guidelines.

3.8. Human Right to Water and Sanitation

We are committed to responsible water stewardship and recognize access to safe drinking water and sanitation as a basic human right. We strive to improve water use efficiency in our operations and ensure that the effluent generated does not pollute the receiving waters. We transparently disclose and effectively manage water related risks, engaging with relevant stakeholders at locations under water risk. We expect our suppliers to use resources efficiently, including water, and to have sound processes in place for wastewater management.

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3.9. Land Rights

Secure land rights are an essential component of economic prosperity, sustainable food production and responsible stewardship of natural resources. When Clariant acquires land (including purchase, lease and use), we conduct fair and legal negotiations and apply the IFC Performance Standards to implement the principles of Free, Prior and Informed Consent (FPIC), particularly in relation to indigenous peoples and communities. When it comes to our supply chain, particularly when sourcing raw materials such as minerals and biobased materials, we expect our suppliers to respect the rights of local communities and indigenous people rights including the application of the FPIC principle.

4. Human Rights Due Diligence

Clariant's commitment to respecting Human Rights is integrated into all our operations and decision-making processes. Human Rights Due Diligence is an ongoing process through which Clariant identifies, assesses and addresses actual and potential adverse impacts on Human Rights caused by its business activities and relationships.

We regularly identify and assess risks of adverse impacts across our own operations and supply chain. In doing so, we rely on internal information, such as data gathered by our various functions, supplier assessments or insights from reports received via our grievance mechanism, as well as on external expertise, such as international organizations, non-governmental organizations, experts and relevant stakeholders, including rightsholders' perspectives. We prioritize Human Rights risks taking into account the likelihood and severity of adverse impacts on people and determine appropriate prevention and mitigation actions in response to our key risk areas. These can include enhanced due diligence, engagement with suppliers and contractual assurances, supplier assessments and on-site checks, awareness-raising and training or other measures, as appropriate in light of the specific risk. We acknowledge that many Human Rights challenges may be outside our direct control or of a systemic nature. In such instances, we seek to use our leverage or collaborate with others, particularly our suppliers, but also other industry stakeholders, to support solutions. We regularly review the effectiveness of our risk response, identify learnings and strive to continuously improve our Human Rights Due Diligence.

The Human Rights Due Diligence process is described in our internal Group Human Rights Due Diligence Process Instruction and integrated into relevant and complementary SOPs.

5. Access to Remedy

We recognize that our policies, our internal processes and programs cannot prevent all adverse impacts in our value chain. We are committed to enabling and/or providing remediation where we have caused or contributed to these impacts and to using our leverage to encourage our suppliers to provide remediation when we identify impacts that are directly related to our business activities, goods or services.

To facilitate access to remedy to our employees as well as to other people who may be impacted by our activities, we have established mechanisms to raise complaints. Our mechanisms do not impede access to other remediation channels or processes, and we work with other organizations and companies, as appropriate, to prevent, mitigate, or remedy adverse impacts.

In case our employees or other stakeholders observe or experience actual or alleged violation of Clariant's commitments stated in this Policy, our Code of Ethics, other policies and the applicable law, we encourage them to report this. They may reach out to a trusted person at Clariant, such as their supervisor, Human Resources, Legal, Compliance, Site Managers or use our central reporting mechanism, the Integrity Line. The Integrity Line is operated by an independent third party. It provides Clariant employees, customers, supply chain and contracted workers, business partners and community members with an anonymous and confidential way to report suspected violations of this Policy 24/7. The

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Integrity Line can be accessed worldwide in more than 20 languages via [Clariant International Ltd Whistleblower System | Home](#).

The handling, process and steps for reported cases and investigations, including in relation to Human Rights grievances, are defined in the Integrity Line Policy and we ensure adequate training and support for staff handling Human Rights concerns.

Clariant does not accept any form of retaliation against those who speak up and we have embedded this commitment in our Code of Ethics. Mechanisms are expected to be used in good faith. Individuals subject to retaliation are welcome and encouraged to report it via our Integrity Line, open to all Clariant stakeholders.

6. Breaches of our Human Rights Policy

Clariant takes its Human Rights principles and compliance with them very seriously and is committed to establishing business relationships based on the highest ethical values. Any breaches of the principles of this Policy will be thoroughly investigated and appropriate action will be taken.

7. Reporting

To fulfill our responsibility to respect Human Rights, we are committed to regularly reporting on our activities and progress in line with applicable requirements and based on the UN Guiding Principles on Business and Human Rights as well as the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

8. Roles and Responsibilities

Our work in this area is globally overseen by Clariant's Ethics and Risks Committee. The Human Rights Advisory Group, consisting of the main company functions responsible for various aspects of Human Rights Due Diligence across our own operations and supply chain, including Human Resources, the Head of Procurement, the Head of Health and Safety, the Head of Compliance and the Head of Sustainability Affairs is steering global human rights related activities. This ensures that every part of our business is clear about the responsibility to respect Human Rights and that Human Rights considerations are integrated into relevant management systems and processes.

The Clariant Human Rights Governance details the Human Rights management system further with clear definition of roles and responsibilities within the Global Functions as well as in the Business Units.

9. Annex

Clariant Human Rights Governance

10. Last Revision Reason for Changes

- 1) Clause 5: Update link to new Integrity Line Plattform
- 2) Clause 3.3, added the word "intersex" in the second sentence "... Ethnicity, color, age, sex or gender, intersex, sexual orientation"
- 3) Clause 8: Replacement of the Human Rights Committee, through the *Ethics and Risks Committee*

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