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Human Rights Policy

1. SCOPE & PURPOSE

At Archroma, we are committed to upholding fundamental human rights principles in all our operations, supply chains, and interactions. This commitment is embedded in our Code of Conduct as well as our Supplier Code of Conduct.

This policy outlines our commitment and expectations regarding human rights and describes our human rights due diligence (HRDD) and reporting processes for Archroma.

This policy applies globally to the entire Archroma Group and all affiliates, employees, directors, officers, (self-employed) contractors, agency workers and interns.

Archroma also expects its customers, suppliers, business partners and other parties directly associated with its operations, products and services to adhere to the standards set out in this policy.

2. DEFINITION OF HUMAN RIGHTS:

Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination.

3. THE ARCHROMA COMMITMENT AND STANDARDS ON HUMAN RIGHTS

3.1. Our commitment is guided by an international reference framework

Archroma is committed to the highest standards of business ethics and integrity as outlined in our Code of Conduct. More specifically, Archroma is committed to support and respect the human rights of all people with whom we interact – be it directly through our operations or

indirectly through our value chain- as expressed in internationally recognized human rights standards and guided by the international human rights frameworks listed in Annex A.

Archroma complies with the laws and regulations of the markets in which it operates. Where local laws are less stringent than company policies and the above-named internationally recognized human rights standards, Archroma shall seek to follow the higher standards where and when feasible.

3.2. The Archroma salient human rights issues

The Archroma human rights standards are based on international recognized standards and while we do not attach more importance to one human right over another, Archroma implements this policy by prioritizing the most salient human rights¹ risk areas in its business further to regular human rights risk and impact assessments:

- **Safety, Health and the Environment:** We prioritize the health and safety of our employees and communities by maintaining a safe working environment and adhering to all relevant health and safety regulations. We ensure our operations do not negatively impact the human rights or the environment of the communities where we operate.

- **Child labour/forced labour:** We prohibit the use of child labour in our operations and supply chain according to the International Labour Organization (ILO) Convention 138 (Minimum Age) and the ILO Convention 182 (Worst Forms of Child Labor).

We prohibit the hiring of individuals under the legal minimum age or compulsory school age, whichever is higher, for employment. Young workers (those above the legal working age but below 18 years of age) may be employed under Archroma-approved short-term internships, apprenticeships, education credit 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.

We have zero tolerance for modern slavery, forced labour and human trafficking and will ensure our operations are free from these practices. We will work with our business partners and suppliers to influence the elimination of modern slavery, forced labour and human trafficking. We proactively and progressively engage with our supply chain on each of these issues. Our approach is in keeping with The Archroma Code of Conduct and aligned with the human rights standards referenced in Annex A.

- **Fair Labour Practices:** We respect the right of employees to form and join trade unions and engage in collective bargaining. We adhere to fair labour practices and ensure fair wages, reasonable working hours, and safe working conditions for all employees.

- **Non-Discrimination/equal opportunity:** We do not discriminate against anyone based on protected characteristics. Protected characteristics are defined as personal traits,

¹ In alphabetical order

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characteristics and/or beliefs that are defined by applicable law as protected from discrimination and/or harassment.

We are committed to providing a workplace free from discrimination, harsh or degrading treatment, harassment or any other unprofessional behaviour. We ensure equal opportunities for all employees regardless of race, gender, age, religion, disability, or any other protected characteristic.

4. HUMAN RIGHTS DUE DILIGENCE

With the support of digital tools and other means, Archroma:

- conducts regular human rights due diligence on suppliers to identify, prevent or mitigate any adverse human rights impacts related to our operations, and
- tracks results and progress.

5. IMPLEMENTATION

5.1. Responsibility

The Archroma ESG Council oversees the implementation of this policy.

5.2. Training and Awareness

Archroma is committed to providing regular training to employees and partners on human rights principles and our policy commitments.

6. REPORTING

We regularly monitor our operations and supply chains to ensure compliance with this policy. Any violations of this policy can be reported in accordance with our Code of Conduct via the Archroma Compliance Team or the Archroma Whistleblower Hotline/Portal. We are committed to report annually on our human rights performance and progress.

7. CONTINUOUS IMPROVEMENT

Archroma is committed to continuously review and improve our practices to align with evolving human rights standards and to regularly review this policy to ensure its effectiveness.

8. BREACH/NON-COMPLIANCE

Any breaches and non-compliance of this policy will be investigated, and appropriate action will be taken which may include disciplinary action, up to and including termination of employment, contracts and business relationships.

Violations of the law, Archroma's Code of Conduct and this Policy, can result in remedial corrective or disciplinary action up to and including termination of employment.

History

Version	Date	Change	Author
1	01.09.2024	1st Edition	A. Stienecker

ANNEX A: INTERNATIONAL HUMAN RIGHTS STANDARDS FRAMEWORKS

1. Universal Declaration of Human Rights (UDHR)
2. ILO Core Labour Conventions, including ILO Convention No. 138 on minimum age for admission to employment and ILO Convention No. 182 on the worst forms of child labour
3. OECD Guidelines for Multinational Enterprises on responsible business conduct
4. OECD Due Diligence Guidance for Responsible Business Conduct
5. European Corporate Sustainability Reporting Directive (CSRD)
6. Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour (DDTrO)
7. UN Convention on the Rights of the Child (UNCRC)
8. United Nations Guiding Principles on Business and Human Rights (UNGPs)
9. The Ten Principles of the UN Global Compact (UNGC)
10. UNICEF's Children's Rights and Business Principles (CRBP)
11. Responsible Care Global Charter