

HUMAN RIGHTS POLICY

INTRODUCTION AND PURPOSE

At Solstice Advanced Materials, we are committed to supporting human and workplace rights in our global operations and supply chain. We believe that workers should be treated with fairness, dignity, and respect, and we seek to ensure that every employee has a voice in our workplace. This commitment is grounded in international human rights principles that independent organizations have proposed, such as the United Nations Guiding Principles on Business and Human Rights, Ten Principles of the United Nations Global Compact and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, as well as all applicable laws of the jurisdictions where we operate.

RELATED POLICIES, INFORMATION AND RESOURCES

- [Solstice Advanced Materials Code of Business Conduct](#)
- [Solstice Advanced Materials Partner Code of Business Conduct](#)

SCOPE AND APPLICABILITY

This policy applies to all Solstice Advanced Materials workers worldwide, including contingent workers, agents and candidates for hire. Solstice Advanced Materials also requires partners to uphold Human Rights principles as described in the [Solstice Advanced Materials Partner Code of Business Conduct](#).

POLICY

Solstice Advanced Materials recognizes its responsibility with regards to:

- **Inclusion and Belonging:** Our workplace is one that reflects the global diversity of the communities in which we operate, and we are committed to providing employees with a workplace that is free from unlawful discrimination. We are committed to maintaining an inclusive, safe, and respectful working environment for all employees, regardless of gender, race, color, ethnic background, age, religious belief, national origin, affectional or sexual orientation, gender identity, disability, marital status, veteran status, citizenship or impending citizenship, or any other characteristic protected by law. Solstice Advanced Materials has zero tolerance for unlawful discrimination or conduct that otherwise singles out an employee or group of

employees based on the protected categories listed above.

- **Workplace Respect:** Employees should be able to work and learn in a safe, yet stimulating, atmosphere and Solstice Advanced Materials will not tolerate intimidating, hostile, abusive, or offensive behaviors in our workplace. Solstice Advanced Materials has zero tolerance for such conduct, which is strictly prohibited. This applies to all phases of the employment relationship, including hiring, promotion, demotion, transfer, discipline, layoff or termination, compensation, use of facilities, and selection for training or related programs.
- **Freedom of Association:** Solstice Advanced Materials recognizes and respects employee rights to join or not join any lawful organization. We recognize that employees have the right to seek labor representation, join unions, and bargain collectively in many places in which we operate. We respect our employees' right to make informed choices about labor representation, free of coercion. Where employees have labor representation, we strive to build a positive, business-focused relationship with their representatives while continuing to meet our commitments to each employee under this policy.
- **Workplace Security:** We seek to prevent any acts or threats of violence in our workplaces. Individuals who engage in violence or threats of violence may be subject to disciplinary action, up to and including termination of employment, as well as possible criminal prosecution.
- **Safe and Healthy Workplace:** By integrating health, safety, and environmental considerations into all aspects of our business, we protect our people and the environment, achieve sustainable growth and accelerated productivity, drive compliance with all applicable regulations, and develop the technologies that expand the sustainable capacity of our world. Our Health, Safety, and Environment, Product Stewardship, and Sustainability (HSEPS) Management System reflects our values and helps us meet our business objectives. Adherence to our HSEPS management system helps ensure that our employees, communities, and environment remain safe.
- **Work Hours and Wages:** Solstice Advanced Materials pays all workers at least the minimum wage required by applicable laws and regulations and provides all legally mandated benefits. In addition, Solstice Advanced Materials complies with all applicable maximum working hours laws and regulations and workers are compensated for overtime hours at or above the rate required by applicable laws and regulations.
- **Forced Labor and Human Trafficking:** We prohibit all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery

and any other form of human trafficking. We do not conduct business with any third parties who engage in human trafficking or forced labor. Solstice Advanced Materials seeks to prevent engagement in human trafficking activities and prohibits certain conduct, including: a) procurement of commercial sex acts, b) destruction, retention or denial of employee access to their identity or immigration documents, c) making material misrepresentations during recruitment of employees, and d) charging employees recruitment fees.

- **Child Labor:** Child labor is strictly prohibited. Solstice Advanced Materials does not employ children. The minimum age for employment or work shall be 16 years of age, the minimum age for employment in that country, or the age for completing compulsory education in that country, whichever is higher, provided that this requirement does not prohibit participation in legitimate and lawful workplace apprenticeship or shadowing programs.
- **Local Communities:** We respect the rights of local communities and those who live and work there consistent with international human rights standards. We continuously monitor and address the environmental impacts of our business operations on our neighbors and strive to create positive impacts on adjacent communities through local engagement and charitable programs.

VIOLATIONS

Solstice Advanced Materials will take appropriate action against employees, agents, customers, suppliers and other partners who violate this policy. Solstice Advanced Materials employees who violate this policy may be subject to disciplinary action up to and including termination of employment, and partners who fail to comply with the Partner Code of Business Conduct may be subject to termination as a Solstice Advanced Materials partner and possible legal action.

REPORTING CONCERNS AND SEEKING GUIDANCE

Solstice Advanced Materials directors, officers, and employees have a responsibility to report any circumstance that may involve a violation of this policy and may do so anonymously. Solstice Advanced Materials personnel and third parties may report concerns through the following channels:

ONLINE:

Submit an online report: <https://solstice.speakfullynow.com>

DIAL:

Call Solstice Advanced Materials' Integrity Helpline: 1-888-829-8316 if dialing from the United States. If you want to report in another language or see specific phone numbers outside of the United States, refer to the Solstice Advanced Materials Integrity and Compliance Web Page for a listing of additional country specific helpline numbers.

WRITE TO:

Solstice Advanced
Materials Inc. Attention:
Integrity Helpline 115
Tabor Rd
Morris Plains, NJ 07950 USA.

The Integrity Helpline is a 24-hour service. It is answered by an independent third-party provider that accommodates languages that Solstice Advanced Materials employees speak. If you have difficulty using the helpline or have a compliance question, please email us at IntegrityHelpline@Solstice.com.

Suspected violations may be reported by identifying yourself or by remaining anonymous. In Europe, specific processes have been implemented to comply with rules that limit anonymous reporting.

Solstice Advanced Materials will treat all reports confidentially to the extent possible, consistent with the law, Company policy, and the Company's need to conduct a thorough investigation.

All reports will be investigated promptly and thoroughly, consistent with applicable law and, upon the advice and approval of the Law Department, may be reported to the appropriate authorities.

Solstice Advanced Materials will not tolerate any form of retaliation against you for making a good faith report of actual or potential misconduct.

DUE DILLIGENCE, AUDITS AND MONITORING

We recognize that human rights due diligence is a continuous process, and we have policies, processes, training, audit, and other monitoring systems in place in furtherance of this commitment.

RESPONSIBILITY FOR THE POLICY

The Chief Human Resources Officer or his/her designee is responsible for interpretation and management of this policy in consultation with the Solstice Law Department.