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## 1 INTRODUCTION

Actylis, a leading global manufacturer and sourcing expert of critical raw materials and performance ingredients for the life sciences and specialty chemicals markets, made its debut in September of 2022.

The company combined the previous entity, Aceto, and 10 industry specialists into an integrated global ingredient powerhouse and is the culmination of an ambitious initiative to address the major unmet need for better and more dependable access to critical raw materials and performance ingredients essential for the manufacture of highly regulated products in key industries.

At Actylis, our first and most important value is to always do what is right. Our values are rooted in respect for the human rights of everyone we work with. We respect and acknowledge internationally recognized human rights principles. Within the company, we are committed to treating people with dignity and respect, as well as providing and supporting all human rights, including labor rights.

Our Labor and Human Rights Policy conforms to:

- The United Nations Guiding Principles on Business and Human Rights
- The United Nations Universal Declaration of Human Rights
- The International Labor Organization’s 1998 Declaration on Fundamental Principles and Rights at Work
- OECD Guidelines for Multinational Enterprises

In addition, this Policy supplements Actylis’ Code of Business Conduct and Ethics, which guides all our employees in our daily work and requires that we be responsive to the concerns of the communities in which we operate, exercising the highest degree of honesty and integrity in our dealings with others.

These important documents should be reviewed carefully and read together

## 2 FUNDAMENTALS

### What are Labor and Human Rights?


As defined by the United Nations, Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status, protected by the laws where we operate. 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. Labor rights are a subset of human rights, in that the workers are treated with dignity that they are entitled to as human beings.

### Who is covered by this Policy?

This Policy applies to all employees and executives of Actylis and any of its subsidiaries around the world. All Actylis employees are responsible for understanding and abiding by this Policy at all times.

In addition, this Policy applies to all business partners who provide services to Actylis directly related to obtaining, retaining, or facilitating business or handling our business matters (“Third Parties”). Such Third Parties may include, but are not limited to, distributors, agents, brokers, supply chain partners, consultants, resellers, contractors, and professional service providers. It is expected that these obligations will be communicated clearly to all such Third Parties and contractually required wherever possible. Sample contract language is available from the Legal Team.

### Why does it apply to Third Parties?

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People working in global supply chains often suffer serious labor rights abuses, including child labor, and communities face human rights impacts from environmental damage caused by various industrial activities. Actylis' global operations, including a vast global supply chain, make it particularly vulnerable to labor and human rights violations in the process. Under most labor laws, Actylis can be held liable for the human rights violations or can be impacted by the disruptions in the supply chain due to such violations. We must let our Third Parties know about our unwavering commitment to follow these laws and what this Policy requires of them. Any Third Party being considered to work for or on behalf of Actylis must agree to abide by this Policy.

### **Who administers the Policy and can answer my questions?**

Our Human Resources team is responsible for administering, reviewing, and updating this Policy as necessary. It is also the responsibility of every Actylis Company leader to ensure that all employees in his or her respective departments understand and abide by these policies.

Employees may report concerns through our reporting tool, in accordance with the Speak Up Policy, via the Actylis website.

If you have any questions, concerns, or would like to discuss anything related to this Policy, please contact John Elliot Simpkins, Senior Vice President, Human Resources at 516-478-9560 or [jesimpkins@actylis.com](mailto:jesimpkins@actylis.com).

## **3 LABOR & HUMAN RIGHTS POLICY**

### **3.1 Freedom of Association and the Right to Collective Bargaining**

Actylis recognizes employees' rights to freedom of association and collective bargaining. We respect employees' rights to join, form or not to join a labor union without fear of harassment and reprisal. When collective negotiations take place, we are committed to establishing a constructive dialogue with the employees' lawful representatives.

### **3.2 Forced Labor and Human Trafficking**

Actylis prohibits the use of all forms of forced or compulsory labor, including prison labor, indentured labor, bonded labor, military labor, and slave labor in our operations, and does not engage in any form of human trafficking. The company forbids harsh or inhumane treatment, including corporal punishment or the threat of corporate punishment.

### **3.3 Child Labor**


Actylis prohibits the employment of anyone under the local legal age requirement.

### **3.4 Harassment Prohibition**

As an equal opportunity employer, Actylis is committed to providing a work environment free of harassment, discrimination, and retaliation based on race, religion, color, sex (including pregnancy, childbirth, breastfeeding or related medical conditions), sex stereotype, gender, gender identity, gender expression, national origin, sexual orientation, citizenship, ancestry, age, marital status, military or veteran status, physical or mental disability, or any other basis protected by applicable federal, state or local law or ordinance or regulation (collectively, "protected characteristics"). Actylis also prohibits harassment, discrimination, and retaliation based on the perception that someone has any of the protected characteristics or is associated with a person who has or is perceived as having any of the protected characteristics.

### **3.5 Work Hours, Wages, and Benefits**

Actylis is committed to fair pay for all. We offer our employees wages and benefit packages that are comparable for our industry, and in line with respective local labor markets and laws. We ensure employees have work hours

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that are compliant with all applicable legal regulations. In addition, we strive to provide our employees with opportunities to broaden their skills through training and professional development programs.

### **3.6 Safe and Healthy Workplace**

Actylis is committed to providing a safe, clean, and healthy workplace in compliance with all applicable and legally mandated local standards and regulations. We are committed to providing appropriate access to safe water, sanitation, and hygiene to all our employees. We believe the workplace can be happier, healthier, and more productive by minimizing the risk of accidents, injuries, and exposure to health risks. We are committed to engaging with our employees to continually improve health and safety in our workplace, including helping employees better identify and remedy potential health and safety issues.

### **3.7 Workplace Security**

Actylis is committed to maintaining a workplace that is free from violence, intimidation, and other unsafe or disruptive conditions. The safety of our employees is of the utmost importance, and security safeguards for employees are regularly assessed and provided as needed. We have security arrangements, infrastructure, and assets to protect our employees and property in all our offices and facilities.

### **3.8 Guidance and Reporting for Employees**

Actylis encourages all individuals to immediately report any concerns or suspected violation of this Policy, our values, Code of Conduct, global or local policies or the law. Employees may bring their complaint to their supervisor, the Legal Department, or the Human Resources Department, as appropriate. Reports may be anonymous, except where restricted by local law.

The Company prohibits and will not tolerate retaliation against any employee for making a good faith complaint or for participating in an investigation of such a complaint.