

# Human Rights Policy Statement

## Our commitment to respect human rights

*At AkzoNobel, we understand that through our roles as employer, manufacturer, business partner and member of many communities, we have the potential to directly and indirectly impact the lives of millions of people.*

While we're committed to making a positive impact through our products and community programs, we're aware of the potential negative impact we might cause, contribute to or be linked to. We recognize our responsibility to respect the human rights of all stakeholders across our value chain and are committed to actively and systematically assess (potential) human rights impacts and take action where needed to ensure our impacts on people's lives are as positive as possible.

As part of our core principles and in line with the United Nations Guiding Principles on Business and Human Rights (UNGPs), we're committed in our operations and across our value chains to respecting all internationally recognized human rights and labor rights, as set out in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

We support the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. We expect all our business partners to respect human rights and apply equivalent principles, and we seek to support them actively in their implementation where needed. Further support is provided by our human rights framework, which includes policies and rules, a governance structure, focus on salient issues, due diligence processes to identify and mitigate risks, a grievance mechanism and reporting on risks and actions.

## Policies

### Code of Conduct, policies and rules, training

Our Code of Conduct outlines our commitment for avoiding the infringement of human rights, and for remediating any human rights impact resulting from our activities, our products, or any activities that our business partners conduct on our behalf. The Code of Conduct is supplemented by policies and rules on topics such as health and safety, anti-harassment, working hours and child labor. Our Code of Conduct, policies and rules apply to all employees, in all countries in which we operate.

We carry out Code of Conduct training for all our employees every other year (both online and face-to-face, and tailored to white and blue collar colleagues), as well as specific training on key risks to targeted audiences. The progress on training is reported to our Executive Committee and Audit Committee on a quarterly basis. This is also supported by a communication program, which focuses on having a strong tone at the top, raising greater awareness and driving improvement.

### **Business Partner Code of Conduct, training**

We have a diverse supply chain and recognize the essential role our business partners play in helping us deliver our high quality and responsibly sourced products. Our Business Partner Code of Conduct sets out the ethical principles we expect from anyone we do business with, including our suppliers, distributors and agents. All new business partners are expected to apply the principles laid down in the Business Partner Code of Conduct, or apply equivalent principles.

We've also published our Responsible Sourcing Policy, which translates the principles in our Business Partner Code of Conduct into expanded and concrete expectations from our business partners. Non-compliance with the Business Partner Code of Conduct and/or the Responsible Sourcing Policy may lead to measures being taken, including termination of the business relationship.

We provide various sustainability trainings to our buyers. These trainings are available via our Success Factors learning academy and the Together for Sustainability academy. We also offer live training on human rights due diligence.

All suppliers have access to the TfS and EcoVadis academy, with dedicated courses on sustainability topics in multiple languages.

## **Governance**

### **Human Rights Committee**

Our Executive Committee is responsible for ensuring that our company operates in line with our core principles of safety, integrity and sustainability, including our commitment to respecting human rights. Our Executive Committee has delegated part of this responsibility to our Human Rights Committee\*, responsible for developing and supervising the Group's human rights\*\* framework. The committee is cross-functional and includes representatives of: ESG Legal; Health, Safety, Environment and Security; Human Resources; Integrity and Compliance; Procurement; Product Safety Regulatory Affairs; ESG Reporting; Risk and Internal Control; and Sustainability. The committee meets regularly to review findings and progress, provide guidance and act where necessary. Preventive, mitigating and remediating measures as a result of our due diligence processes (see the Due diligence section) are also monitored by the Human Rights Committee.

\* The Human Rights Committee comprises the designated "responsible persons" as laid out in section 4 (3) of the German Lieferkettensorgfaltspflichtengesetz.

\*\* Also covers related environmental risks when mandated by regulations.

## Salient issues

While we respect all human rights equally, we've prioritized certain human rights issues based on their severity and likelihood.\*\*\* This has resulted in the salient human rights issues (see table below) for us to focus on and conduct further due diligence. Health and Safety and Working time (the latter is part of the salient issue Working conditions) have also been identified as a material topic under the CSRD's double materiality assessment.

### Salient human rights assessment

	Upstream supply chain (suppliers)	Own operations	Logistics	Downstream (customers, end-users)
Health and safety	●	●	●	●
Working conditions	●	●	●	
Discrimination and harassment		●		
Negative impact on local communities		●		
Modern slavery	●		●	

#### 1. Health and safety

Being a manufacturing company, the health and safety of people is one of our highest priorities. AkzoNobel has implemented a global people, process and product safety management program, through which we strive to ensure that the highest safety standards are applied to our activities and sites. In addition, our Life-Saving Rules program embeds eight key safety rules that must be applied with zero tolerance, along with one golden rule that all our employees are empowered to stop any work that they recognize as being unsafe. We're also focusing on health and safety at our suppliers and logistics partners.

#### 2. Working conditions

Our people are essential to the success of our company. We won't achieve our vision of leading performance in the markets in which we operate without an engaged workforce that believes AkzoNobel is a great place to work. We must therefore offer decent working conditions, including safe working hours and reasonable salaries. We've introduced a company-wide global working hours standard, irrespective of national laws being less strict. Working hours are also a focus area with regards to our suppliers and logistic partners.

#### 3. Discrimination and harassment

We strive to foster a culture of dignity and respect, free of harassment and

discrimination. We're training our workforce on this and we promote several channels where our employees can raise their concerns. For example, our SpeakUp! grievance mechanism offers our employees, business partners and the general public a confidential environment in which they can raise concerns relating to breaches of our Code of Conduct, including the human rights reflected therein.

\*\*\* From 2023, we've integrated our global salient human rights issues assessment into our yearly CSRD Double Materiality Assessment process.

#### 4. **Impact on local communities**

We aim to be a good neighbor and contribute to the well-being of communities. We work closely with local neighborhoods to manage the social and environmental impact of our business activities, address any concerns about our operations and enhance the benefits we're able to bring.

#### 5. **Modern slavery**

We have zero tolerance for modern slavery, such as child or forced labor, and conduct relevant due diligence into our identified high-risk supply chains beyond our first tier suppliers.

## Due diligence

### *Specific due diligence processes own operations*

We operate continuous topic-specific due diligence processes that help us identify (potential) human rights impacts, on which we both engage and communicate. For example, our Health, Safety, Environment and Security (HSE&S) audits assess the health and safety conditions at our manufacturing sites and stand-alone RD&I locations.

Through that same process, we require every location to have a procedure in place that covers processes for stakeholder outreach and external complaints regarding surrounding communities. If members of surrounding communities have a complaint, they can file it directly with the site manager of the relevant location (any complaints are registered and tracked in a central tool), or raise their concerns through our SpeakUp! grievance mechanism.

### *Site-level assessments*

In 2024, we went a level deeper than the global approach to identify (potential) human rights issues at a more local level. These entities were prioritized based on an abstract risk rating provided by a third-party supplier (Ecovadis IQ Plus, sustainability intelligence for global supply chains). After that, the list of sites was further prioritized by number of employees and magnitude of operations. We then carried out a human rights risk verification survey for these 13 sites on topics such as health and safety, forced and child labor, freedom of association and unequal treatment. We're in the process of review and follow-up, and subsequently taking preventive, mitigating and remediating actions where necessary.

### *Supply chain*

We work together with our direct suppliers to create a more responsible and sustainable supply base. Our supplier sustainability framework continuously monitors the sustainability level of our suppliers, including their performance on human rights. With Together for Sustainability (TfS), we aim to implement effective, leading-edge practices across the industry. As a TfS member, we're utilizing the TfS sustainability programs that include online standardized assessments (conducted by third-party EcoVadis, a global leader in CSR assessments), and announced on-site audits, carried out by approved TfS third-party auditors. Both programs review our suppliers' performance on human rights and working conditions. The results of our TfS assessments and audits allow us to identify areas for improvement and focus improvement activities relating to the suppliers that are assessed through the platform.

For indirect suppliers, the TfS program already addresses sustainable procurement activities at our suppliers (our tier two suppliers). In addition, we have a human rights due diligence program to address potential impacts on human rights further up our value chain.

## **Grievance mechanism**

We promote a feedback culture through communications and training. An open atmosphere helps identify issues, including concerns relating to respect for human rights. In addition, our SpeakUp! grievance mechanism offers our employees, business partners and the general public a confidential environment in which they can raise concerns relating to breaches of our Code of Conduct, including the human rights reflected therein. The availability of the SpeakUp! process to raise concerns is widely communicated in and outside the company. The results are reported every year and can be found in the Compliance and integrity management chapter in the Governance and compliance section of our annual report.

## **Reporting**

We report annually on our human rights framework in our annual report, in our Sustainability statements. In addition, we also report separately where it's legally required to do so.

Signed

AkzoNobel Executive Committee

*Last updated: November 2024*