

Version 2.0 FINAL



PRODUCT POLICY

PREAMBLE

Evonik is a leading global specialty chemicals company headquartered in Germany. The protection of people and the environment are elementary components of our actions. It is therefore a matter of course for us that all chemical products are manufactured, handled, used and disposed of not only in compliance with the law but also under safe conditions. To this end, we not only implement the legal requirements, but in many cases go beyond them.

In our globally applicable USGQ values (USGQ = Environment, Safety, Health, Quality), we have committed ourselves to protecting people and the environment wherever we operate. The principles of Responsible Care are binding for our product stewardship worldwide.

OUR APPROACH

Evonik does its utmost to ensure that our products make a substantial contribution to improving the quality of life and to sustainable development.

Together with the Sustainability unit, we pursue a holistic approach to our products within the framework of the circular economy.

In addition to complying with legal requirements, we are actively involved in voluntary programs and commitments to continuously improve the safety and sustainability of our products.

This includes, for example, the continuous procurement of information and data on our products, but also continuous improvement in handling and use and, last but not least, intensive communication with our customers.

The procurement of substance-specific data as well as use-specific information is always carried out with special consideration of responsible animal welfare.

PRODUCT STEWARDSHIP

For Evonik, product stewardship means meeting constantly rising demands and continuously making our products safer, more environmentally friendly and more sustainable. In addition, Product Stewardship sees itself as an integral part of the business for determining, managing and reducing health, safety and environmental risks in all phases of a product's life cycle.

This process begins in the early stages of research and development of our products and ends in an appropriate recycling approach or safe disposal route.

Our standards for product stewardship are high. Based on scientific principles and assessments, we aim to gain and deepen credibility, integrity and trust in society. We pay particular attention to employees, customers, suppliers and shareholders.

Product Stewardship encompasses a wide range of substance- and product-related topics, such as "**Chemical Regulations**", i.e. the continuous and global tracking of regulatory changes as well as the implementation of all statutory chemical and application-related regulations.

Under the term "**Process Data Management**" Evonik bundles substance data sovereignty on the basis of a Group-wide database as a source for professional, legally compliant and up-to-date safety data sheets as well as product labels in the sense of reliable product communication with our customers.

At Evonik, "**Hazard & Risk Management**" involves the collection and scientific evaluation of all available data and information for the risk assessment of our products. Evonik sees the necessity of taking into account not only the substance data (hazard) but also the existing usage patterns and the associated exposure when assessing the risk. From Evonik's point of view, an assessment based solely on intrinsic properties is not scientifically meaningful and therefore not justifiable. As part of our self-developed "**Chemicals Management System (CMS)**", we subject our substances that are placed on the market in quantities of more than 1 metric ton per year to a multi-stage assessment. Particularly hazardous substances are also taken into account in quantities of less than 1 metric ton.

The system helps to maintain and further build a future-proof and sustainable product portfolio by identifying substance-related hazards, determining the possible exposure patterns and finally assessing the potential risk, thus enabling an early response.

Our **Chemicals Management System^{PLUS}** extends the focus to the product view. Here, four central points are considered:

The raw materials used are reviewed for opportunities to reduce Substances of Very High Concern (SVHC) (**reduction**). Opportunities for improvement in manufacturing processes are investigated to further reduce or completely eliminate potential undesirable ingredients in our products (**reduction of toxicity**). In addition, work is continuously being carried out to further reduce exposure to humans and the environment through stringent risk management measures

such as safe use, handling, training of employees and customers, or even restrictions on use (**risk management**).

Finally, we are intensifying research into and development of alternatives for substances with properties of particular concern (**substitutes**).

This forms the basis for effective and technically sound communication with our customers about the impact of our products and thus strengthens trust in Evonik and our products. The active involvement of Product Stewardship in specific sustainability issues also helps to further align the portfolio for the future. Evonik is also involved in activities and voluntary commitments that are not directly covered by statutory regulations, such as **Responsible Care**.

NANOMATERIALS

By exploiting the opportunities offered by nanomaterials and using them responsibly, we support sustainable development. Nanomaterials help us to make a significant contribution to environmental and climate protection with new products and efficient solutions for our customers.

In taking measures to protect employees, customers and consumers when dealing with nanomaterials, we are guided by the latest findings from scientific studies on hazard and risk

assessment as well as epidemiological and toxicological studies. We also support the establishment of new investigation methods tailored to the specific properties of nanomaterials, which enable a refinement of risk assessment. To this end, we work closely with leading research institutes and regulatory authorities.

BIOTECHNOLOGY

Evonik is exploiting the opportunities offered by biotechnology to develop efficient and environmentally friendly manufacturing processes for our products. This makes it possible to tap substances that are difficult or impossible to access using conventional chemical methods. It also enables Evonik to optimize its own products and further minimize potential risks. Responsible and safe use of this technology is a matter of course for Evonik, which is why we have adopted appropriate guidelines.

ANIMAL PROTECTION

To evaluate the safety of our products, we need toxicological and ecotoxicological data. Evonik aims to reduce the number of laboratory animals as far as possible or to avoid animal studies

altogether in the future. We therefore check whether alternative methods (literature, NAMs (New Approach Methodologies), read-across, weight of evidence) are available and can be used.

From a scientific and legal point of view, animal studies are in many cases the only way to obtain the (eco)toxicological data required by regulations. Evonik has such animal studies carried out exclusively by certified testing institutes in accordance with national and international legal requirements. Renowned testing institutes are selected and audited for this purpose. In addition, our framework agreements oblige our test institutes to comply with the highest quality and animal protection standards. As a responsible company, Evonik has an Animal Welfare Officer and its own animal welfare guidelines.

CONFLICT MINERALS

The Dodd-Frank Act, Sec. 1502, which applies in the USA, requires all companies listed on the US stock exchange to provide information on whether their products contain the minerals gold, tantalum, tungsten and tin - irrespective of the quantity used - if they originate from the Democratic Republic of the Congo or neighboring countries. Although Evonik is not listed on the U.S. stock exchange, as part of the supply chain of U.S.-listed companies we consider it our duty to be able to provide appropriate confirmation at the request of customers. A corresponding

process has been established internally for this purpose. The inclusion of further critical raw materials is continuously evaluated. In addition, we require appropriate proof of origin from new suppliers as part of the qualification process. Our goal is not to use any conflict minerals.

TRAINING

We train employees, and on request also customers, in the responsible handling and use of our products throughout the entire life cycle.

COMMUNICATION

Evonik communicates activities on product stewardship issues, e.g. in the Sustainability Report. Opportunities and risks are presented in a transparent and balanced manner. The company seeks open and honest dialogue with society, our customers, our employees and other

stakeholders. Evonik is also audited annually by external auditors on the subject of product stewardship.

Evonik also seeks contact with all stakeholders along the supply chain, for example via the Single Point of Contact (SPC) REACH@evonik.com.