

A stylized illustration of a hand holding water molecules. The hand is rendered in a light blue, textured style, with fingers slightly curled as if holding something. Above the hand, several water molecules are depicted, each consisting of a large light blue sphere (oxygen) and two smaller light blue spheres (hydrogen) connected by thin lines. The background is a dark blue gradient, with a lighter blue area behind the hand and molecules. The overall aesthetic is clean and scientific.

***SNF***

WATER SCIENCE

. 2021 .

**ENVIRONMENTAL &  
SOCIAL RESPONSIBILITY  
REPORT**

SNF specializes in water science. The Group's products are designed to either treat, recycle or preserve water, or help its customers save energy and reduce their carbon footprint.

**91% of SNF's revenues meet UN Sustainable Development Goals\*.**

The Group has a long history operating on all continents and employs 6,900 people worldwide and 1,400 in France. **SNF is a pioneer of soft chemistry across all industrial stages: Scope 1 & 2 carbon footprint is low, in proportion with revenues, at around 0.6 million tonnes of CO<sub>2</sub> equivalent.**

Innovation and the movement towards a cleaner, more energy-efficient and less carbon-intensive world are major drivers of growth for SNF, which posted revenues of €3.6 billion in 2021.



In accordance with Article L.225-102-1 of the French Commercial Code, as amended by Order no. 2017-1180, due to the level of its revenues and average headcount, the SNF Group is required to publish a consolidated non-financial performance statement, particularly in respect of its French subsidiary SNF SA.

For the preparation of this non-financial performance report, only the significant French, US, Chinese, Korean, and Indian subsidiaries were considered. They represent more than 95% of the Group's global revenues.

\* see 5.3 "Sustainable Use of Resources"



Pascal Remy, SNF Chairman & CEO

## TOWARDS ZERO CARBON

In 2021, the Group's top priority was still ensuring the health and safety of its staff. Nearly all our employees have been offered the opportunity to be vaccinated at their workplace as this is the best way to protect themselves, their family, and colleagues. Today, all our subsidiaries and plants comply strictly with health and safety protocols and social distancing rules. Stringent cleaning protocols are applied, and masks and hand sanitizer are made available to everyone.

After a year 2020 marked by the outbreak of the COVID crisis, we saw a continued recovery throughout 2021 with a growth of 20% compared to 2020 and 10% compared to 2019. However, the year 2021 was not the easy walk some were expecting. In the US, it started with the winter storm Uri which created a deep freeze that hampered the production of major suppliers for months. In late August, Hurricane Ida struck southeastern

Louisiana, bringing another significant disruption in the supply of some of our key raw materials. In China, after the summer, unprecedented rationing of power supply forced our two plants to reduce their production for several weeks. Lastly, in France, the year ended with several weeks of our water treatment monomer supply interruption. These series of events were coincided with unprecedented price increases of several of our key raw materials and transportation.

SNF has the advantage of being positioned in markets that are at the heart of issues related to water resources and the energy transition. The global demand for all our products is very strong as they are designed to either treat, recycle, or preserve water, or help our customers save energy and reduce their carbon footprint.

This global movement is a powerful driver of our long-term growth as our business is based on Water Science. While 91% of SNF's revenues meet United Nations Sustainable Development Goals, we are continuing our efforts to achieve our goal of being carbon neutral by 2050.



91% of SNF's revenues meet United Nations Sustainable Development Goals. We are continuing our efforts to achieve our goal of being carbon neutral by 2050.



**SNF is a pioneer of soft chemistry across all industrial stages: our sites' Scope 1 & 2 carbon footprint is low compared to our peers,** in proportion with revenues. We strive to minimize even more the environmental impact of our activity, and to reduce the footprint of all our industrial sites. By 2030, SNF aims to reduce its carbon and water intensity by -30% and -20%, respectively. We will achieve these goals by using several levers combining energy decarbonization, new technologies for energy & water recovery, and a responsible chemistry approach in our products.

Sadly, the COVID crisis is still there. However, we have demonstrated in the past two years that we can manage properly our group in this situation as **we are fortunate to have a very decentralized and agile organization that relies heavily on the professionalism and dedication of the teams we have worldwide.** SNF provides water treatment products for over 850 million people and 10,000 production sites worldwide. Our actions in the mining industry are essential to reducing the carbon footprint of mineral extraction. Our actions in the paper industry are vital for supporting the growth of e-commerce and reducing the use of plastics. Our actions in the oil industry help operators consume less water and energy per barrel of oil and reduce the carbon footprint of oil extraction. We work with our clients, suppliers, and partners towards cleaner production processes.

**SNF's ability to finance its growth and investments has never been so strong.** Therefore we have decided to strengthen our investment plan in the next two years and build additional production lines in the USA, Korea, India, and France, where the construction site of a new plant in Dunkirk was officially launched in June.



Since 2008, SNF has integrated the 10 principles of the United Nations Global Compact step by step into its policies, while some sustainable development goals (SDGs) are included in the Group's indicators. As an active member, SNF Group is committed to respecting the universal principles of human rights, labor, the environment, and the fight against corruption in its operations and strategies. This ongoing commitment is published in a Communication on Progress (COP) on the SNF and Global Compact websites.

The SNF Group is demonstrating its commitment to use all resources at its disposal, in cooperation with its partners, and to conduct its business in a way that respects people and the environment by integrating fundamental sustainable development principles into all operations.



Together with EcoVadis, SNF also applies an environmental, social, ethical, and logistical risk assessment procedure. In 2021, the agency upgraded SNF's sustainability rating. The "Gold" level places SNF in the top 2% of companies evaluated with a score of 72/100 and even in the top 1% on the theme of the environment with a score of 90/100.

This approach helps develop social responsibility throughout our value chain. For the past two years, SNF mapped customer and supplier risks in terms of both country risk and business activity. In addition, a corruption module was implemented to identify risks relating to the Group's activities.

After having evaluated the primary SNF suppliers for the Europe, Middle East, and Africa regions at a Gold EcoVadis average level, evaluations were carried out in 2021 for the Group's 20 main customers selected in different application areas for SNF products, as well as for 20 other suppliers from subsidiaries based in Asia and the United States.



As part of its goal of being one of the most exemplary chemical producers in terms of environmental footprint, SNF supports the recommendations issued by the Taskforce for Climate-related Financial Disclosures (TCFD). The recommendations of this working group aim to provide a framework for companies' climate change disclosures around four themes: governance, strategy, risk management, and metrics & targets.



SNF has joined the list of supporters of the Carbon Disclosure Project (CDP) in its efforts to promote corporate transparency and environmental action by making the world's most extensive set of environmental data publicly available.



In 2021, SNF obtained the A1 "Advanced" level from VIGEO, with a score of 60/100, placing the Group 7th out of 41 among its peers. These scores reflect SNF's commitments and level of social responsibility. They were achieved thanks to the Group's employees who have contributed and implemented action plans related to environmental, social, and governance issues.



SNF tracks a number of Global Reporting Initiative (GRI) indicators, listed in the appendices to this document and at the beginning of each section. The benchmark GRI indicators measure how companies' sustainability programs are progressing. These standards represent global best practices for public reporting on a wide range of economic, environmental, and social impacts.



## SNF is guided by the United Nations Sustainable Development Goals (SDGs).

The SNF Group has developed a range of over one thousand products, in keeping with its goal to promote responsible chemistry and improve quality of life for the entire population of the world. Our main monomer is produced enzymatically (a natural biological process) at room temperature and under atmospheric pressure. This process requires little energy.

Given the volumes involved, **this catalysis process makes SNF a pioneer of soft chemistry. We keep our Scope 1 & 2 carbon footprint low (around 0.6 million tonnes of CO<sub>2</sub> equivalent) in proportion to revenues.**

Beyond Scope 1 & 2, SNF is working on Scope 3 and is establishing Product Carbon Footprint. To this end, SNF is asking its main suppliers to provide carbon footprint values (emission factors) for each product supplied. The Group is committed to work with its suppliers on upstream Scope 3 emissions to set ambitious carbon reduction targets aligned with the sciencebased target methodology by 2030.

The Group's products play a crucial role in protecting the environment, saving energy, and ensuring access to essential raw materials.

Lending themselves to a range of industrial and commercial uses, our products are used in any field that involves water:

- ◆ wastewater treatment
- ◆ drinking water production
- ◆ sludge dewatering
- ◆ mining
- ◆ oil and gas extraction
- ◆ farming
- ◆ paper manufacture
- ◆ textile manufacture
- ◆ cosmetics manufacture
- ◆ construction and public works
- ◆ industrial and household cleaning

Used as flocculants, they facilitate the separation of suspended solids in water. As rheology modifiers, they change the viscosity of liquids, while as friction reducers, they enhance the flow of aqueous fluids.

SNF takes particular care to minimize the environmental impact of its manufacturing processes (see 3.0 "Environmental Conduct"). The quality of the Group's footprint is supported by a policy of reducing the number of different inputs.

Our unit consumption of water, gas, and electricity steadily decrease in proportion to the volumes produced. Thanks to rigorous monitoring of effluents, SNF has implemented appropriate measures to optimize production units, install effluent treatment units, and develop new know-how and patents.

Controlled consumption and the search for new solutions, which go hand in hand with environmental and economic responsibility regarding global issues, are common objectives shared by all of the Group's sites. The Group has chosen to focus on the following United Nations Sustainable Development Goals (SDGs):





## TABLE OF CONTENTS

01

### PROFILE AND GOVERNANCE

91% of SNF's sales are in line with the United Nations' Sustainable Development Goals (SDGs).

02

### SOCIAL ENGAGEMENT

SNF is committed to increasing the proportion of women in its workforce.

03

### ENVIRONMENTAL CONDUCT

SNF is committed to reducing its carbon intensity by 30% by 2030 and to achieve carbon neutrality by 2050.

04

### CORPORATE SOCIAL RESPONSIBILITY

SNF creates local jobs and acts as a good corporate citizen wherever it operates.

05

### APPENDICES

SNF has set up a range of indicators to monitor the results of its long-term policies.

06

### INDEPENDENT LIMITED ASSURANCE REPORT



# PROFILE AND GOVERNANCE

1.1 MARKETS AND PRODUCTS

1.2 CORPORATE SOCIAL RESPONSIBILITY

2.1 RISK ANALYSIS

2.2 EMPLOYEE-RELATED RISKS

2.3 HUMAN RIGHTS RISKS

2.4 ENVIRONMENTAL RISKS

2.5 CORRUPTION RISKS

3.1 CORPORATE GOVERNANCE POLICY

3.2 COMPOSITION OF THE BOARD OF DIRECTORS

3.3 QUALIFICATIONS AND EXPERTISE

3.4 INFORMATION ON MEMBERS

3.5 POWERS AND MISSIONS



**SNF is a specialized chemistry group, and all of its products are designed to treat, recycle or preserve water or help customers save energy and reduce their carbon footprint.**

As a pioneer in soft chemistry, SNF is the first global manufacturer of polyacrylamide (PAM), a water-soluble polymer. The Group is the world leader, supplying 48% of global production of this material.

With its balanced global industrial and commercial foothold and strong positions in Europe, the Americas, and Asia, the Group employs 6,900 people, including 1,400 in France, where its head office is located.

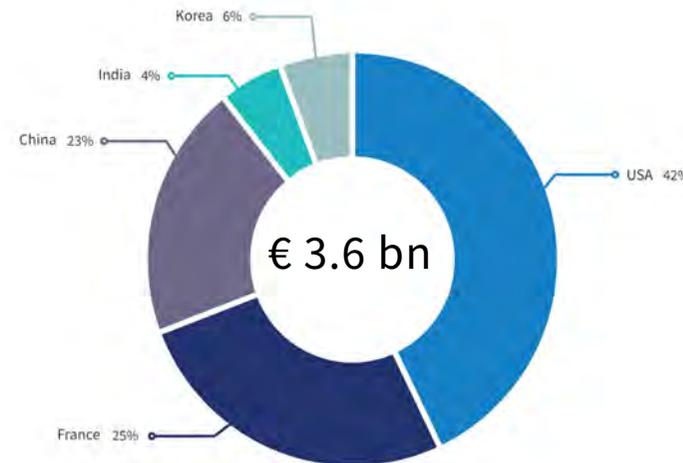
**Innovation and the movement towards a cleaner, more energy-efficient and less carbon-intensive world are major drivers of growth for SNF**, which posted revenues of €3.6 billion in 2021.

Thanks to its innovative solutions, the Group is helping the world meet its most pressing current and future challenges, including access to drinking water. SNF produces over 1,000 products that help preserve natural resources, encourage reuse and recycling and

improve the efficiency of industrial processes.

To maintain its leading position, the Group is constantly expanding its product range and reinvesting all of its financial resources in improving and extending its production facilities. Positioned on core markets with regard to sustainable development issues, SNF is committed to a constant focus on progress and excellence, underpinned by its employees in all of its subsidiaries worldwide.

The goal is to boost the competitiveness of the Group and its customers while minimizing the environmental impact of the related activities. SNF's growth policy respects both communities and the environment. As such, **the Group is aiming to achieve carbon neutrality (Scope 1 & 2) by 2050 and to reduce its carbon intensity down 30% by 2030.** SNF is also aiming to maintain its position as an environmental leader. **The Group has a very low carbon intensity compared to other industry suppliers.** In terms of water consumption, **SNF aims to reduce its water intensity by 20% by 2030.**



Breakdown of Revenues by Country Legal Entities

**1.1 MARKETS AND PRODUCTS**



**WATER TREATMENT**

Water treatment for over 850 million people and 10,000 production sites worldwide



**MINERAL EXTRACTION**

Reducing water and energy consumption in the extraction of metals and minerals crucial to the energy transition



**ENHANCED OIL RECOVERY**

3-6x less water per barrel produced  
2-6x less CO<sub>2</sub> emitted



**AGRICULTURE**

Helping farmers manage water in a responsible and sustainable way



**PAPER INDUSTRY**

Supporting the growth of e-commerce and reduce the use of plastics



**COSMETICS**

NATURSOL™ is a 100% Vegan emulsion made with 67% natural ingredients



**TEXTILES**

Helping to guide the industry toward ZHDC®, zero discharge of hazardous chemicals



**CONSTRUCTION AND PUBLIC WORKS**

Major reduction in water consumption and improved concrete sustainability, standardization, and resistance

### 1.1.1 WATER TREATMENT



Managing water resources is one of the critical challenges facing society today. Water demand is rising due to the boom in urban development, industrialization, and the development of irrigation.

As a major player in water treatment and all related applications, **SNF treats water for over 850 million people worldwide and supports thousands of production sites in their treatment and recycling.**

The Group offers several ranges of flocculants, coagulants, dispersants, antiscalants, and heavy metal precipitants to cover all of the global markets' needs. These products have been approved by a large number government authorities for use per applicable standards.

SNF has developed polymers suitable for all types of treatment, including drinking water production, sludge dewatering, and industrial water.

### 1.1.2 MINERAL EXTRACTION

Mining faces the dual challenge of maintaining or increasing production while reducing the consumption of resources like water and energy.

At the same time, the reagents used to extract metals and minerals must meet strict safety and environmental requirements. SNF offers a comprehensive range of products and equipment to meet the mining industry's challenges, from excavation and primary crushing through to metallurgical refining plants.

The Group's products reduce the need for water, optimize the extraction process, and help limit environmental impact and chemical hazards.

They also help **reduce extraction costs for many metals and minerals essential to the energy transition.**

These solutions are marketed worldwide, including in remote and inaccessible regions, and used for all types of ferrous and non-ferrous ores.

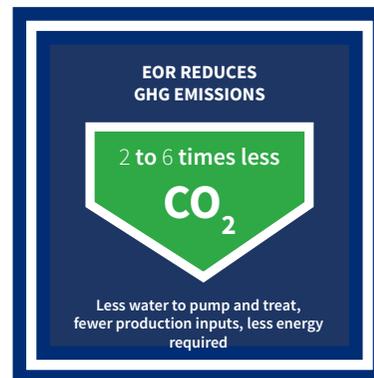
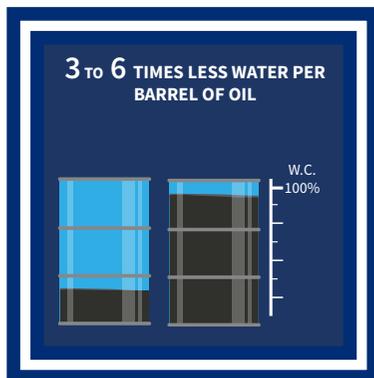
SNF is also involved in the management of tailings and water recycling in the investment and extraction phases to optimize productivity, costs, and environmental performance.



**1.1.3 ENHANCED OIL RECOVERY**

The oil and gas industry faces a growing number of challenges, especially given the extreme conditions in which drilling and extraction often take place. Environmental constraints and reducing CO<sub>2</sub> emissions have also become significant issues. With Enhanced Oil Recovery (EOR), polymer injection operations can extend the life of oilfields and improve extraction conditions.

During extraction, SNF solutions help improve the quantity of the oil extracted, making it possible to use **3 to 6 times less water per barrel of oil and reduce CO<sub>2</sub>\* emissions by a factor of 2 to 6.**



\*See "EOR by SNF" via [snf.com](http://snf.com)

**1.1.4 AGRICULTURE**

Feeding a growing world population is the main driver of agricultural markets. It requires higher yields and enhanced resource management.

Irrigation efficiency, increased water holding capacity, protection against erosion and crusting – **SNF's range of innovative solutions helps farmers manage water responsibly and sustainably.**

For example, FLOBOND™ and SOILPALM™ provide safe and effective solutions for penetration, distribution, and retention of water in fields, orchards, vegetable gardens, ornamental plantations, and turf.

Keeping water close to the roots, AQUASORB™ reduces crop stress and help trees plantation.

The use of polymers during irrigation also helps increase soil cohesion, thus limiting erosion due to water runoff or wind.



SNF also conducts extensive research and practical trials on field crops and horticulture. In cooperation with its customers, the Group assesses its products' agronomic and financial performance.

For example, a research project in Kenya, involving SNF water-soluble polymers, is exploring new ways to reduce the soiling of fine beans and limit costly rejections due to 'soil splash' contamination. Provenance Partners Limited leads this Research project with Cranfield University (UK). The researchers have found that their application technologies can reduce soiling by up 67% of fine beans grown by commercial and smallholder farmers in Kenya for export to the UK.

**1.1.5 PAPER, TEXTILES AND COSMETICS INDUSTRIES**

Essential to the pulp and paper industry, water is used to transport cellulose fibers and combine them with other components. The rise in recycling calls for constant improvement in the chemicals used to maintain quality and performance levels.



SNF manufactures solutions specially designed to meet these challenges. A number of process chemicals are used in machine applications to optimize productivity through improved retention and speed.

Specific solutions support the manufacturing of premium papers and more rigid cardboards made from recycled materials.

These help **support the growth of e-commerce and reduce plastic use**. A wide range of formulations also makes it possible to offer flocculants and coagulants for use in effluent treatment plants.



The Group is also a major player in the textile industry with a wide range of high-performing rheology modifiers, auxiliaries and sizing agents. They are cost effective and respectful for the environment. SNF offer was developed to reduce the water use, the dye consumption and the energy during the printing process. Its fixing agents contribute to a better anchoring on the fibers and less or no release into the waste water streams. SNF complies to the different certifications which are key for the textile industry like GOTS, OEKO-Tex, MRSL (Manufacturing Restricted Substances List). SNF's goal is to help its valued customers to meet their objectives of Zero Discharge of Hazardous Chemicals (ZDHC)



In Personal Care and Cosmetics, SNF is promoting various technologies which are conditioning polymers and thickeners for Skin and Hair Care. Its polymers deliver also various secondary benefits and sensorial emotions among them freshness or soft touch. **The SNF technology allows the use of a cold process during the formulation.** This results to time saving, reduction of the carbon footprint and better sustainability. This is particularly true with NATURSOL™ EMI 132 which has also a naturality index of 67% following the ISO 16128 and is fully vegan.

**NATURSOL™**



### 1.1.6 CONSTRUCTION AND PUBLIC WORKS

SNF offers a series of products for drilling and public works, ranging from viscosifiers and sludge treatment products to dispersants and adhesive products. The Group supplies multiple polymeric ingredients for concrete, cement, mortar, adhesives, coatings, and waterproofing products for underground structures. SNF rheology modifiers, thickeners, dispersants & superabsorbent can significantly improve applications properties like pot appearance for ready-to use pastes, anti-sagging of tiles adhesives, excellent compromise (fluidity/resistance to bleeding) for self-levelling flooring compositions, moisture management & water release control.

In civil engineering, the Group's polymers are primarily used as rheology agents to enhance the performance of bentonite and prepare drilling fluids.



### 1.1.7 HOMECARE AND INDUSTRIAL CLEANING

SNF supplies numerous high-performance polymers for municipal and industrial cleaning products, but also in end-consumer products for laundry care, household detergent and dish washing liquids in order to enhance performances & ease handling. For example, the range of dispersants has a high calcium ion neutralization capacity and excellent compatibility with surfactants commonly used in cleaning formulations. They also optimize the granulation and spray drying process.



### 1.1.8 EQUIPMENT AND ENGINEERING

The SNF Equipment & Engineering division is an industry leader in designing, manufacturing and installing of polymer storage, preparation, and injection equipment. SNF offers both standard and customized systems for optimized use of polymers in liquid, powder or emulsion form. Since 2021, SNF equips these polymer injection units (PIUs) with solar panels.



## 1.2 CORPORATE SOCIAL RESPONSIBILITY

In light of the economic, environmental and social challenges facing the world, SNF seeks to generate sustainable and responsible business growth.



**The Group aims to achieve carbon neutrality by 2050** by providing its clients with long-term and innovative solutions in keeping with the

Sustainable Development Goals set by the United Nations. The Group has made product stewardship and the provision of sustainable and innovative solutions a high priority.

### 1.2.1 GOALS AND COMMITMENTS

SNF has established environmental, safety, and diversity objectives to meet its commitments and measure its progress over the long term.

In this respect, the Group ensures that its operations comply with the law and applicable environmental regulations besides responding to social and economic demands. Environmentally speaking, SNF continues to reduce its greenhouse gas emissions in

keeping with the Paris Agreement, and its atmospheric emissions, effluents, and purchase of carbon-based energy.

A number of initiatives have been implemented to limit the environmental impact of the Group's operations (Scope 1 & 2) to achieve carbon neutrality by 2050 and **a 30% reduction in carbon intensity by 2030.**

**All of SNF's investment projects are valued by applying an internal carbon price of €80.**

SNF has also upgraded production practices to reduce water consumption and has developed closed networks that use reclaimed water, **to achieve a 20% reduction in water intensity by 2030.**

These initiatives are founded on SNF's research and development geared towards sustainable solutions and product stewardship. The Company routinely notifies its employees and the general public about the impact of its operations to ensure proper use of its products and prevent waste.

With regard to occupational health and safety, employee safety, and safety protocols, these are the Group's top priorities. Special attention is paid to reducing the workplace accident rates and mitigating

psychosocial risks. The Group aims to be one of the top-performing companies in this respect. SNF applies a prevention policy based on mechanical integrity programmes for equipment, accident monitoring, and feedback. Training and awareness-raising initiatives are also designed especially for employees and partners, to ensure that they operate in a responsible manner in keeping with the requirements of their respective roles. To keep this approach going and ensure its performance over the long term, SNF is developing a culture of operational excellence by promoting initiatives that contribute to the Company's development. The Group also pays close attention to respect for human rights and anti-corruption efforts. Regarding employee diversity and development, SNF is committed to its policy of respecting employees of different nationalities, promoting gender equality, and supporting those with disabilities. Employees also receive career development support throughout their time at the Company.

### 1.2.2 GLOBAL METHODOLOGY

The Group's Chairman & Chief Executive Officer and entire senior management team fully support SNF's commitment in terms of environmental and social performance. A network of international managers ensure that social and environmental aspects are taken into account in all countries.

Internally, environmental, social and ethical policies are approved by senior management, who share them with the entire Group and monitor their implementation. Every year, SNF's CSR and Quality Director presents the findings of the non-financial data audit to the Group's stakeholders and Board of Directors.

Implementation of the Group's commitments requires regular performance assessments. SNF regularly revises its objectives in line with results obtained, the latest scientific and technical knowledge, and changes in the economic and social context. These assessments are shared with all staff and partners via communication and information campaigns. SNF leverages feedback to benefit all Group companies and stakeholders, in an effort to ensure continuous improvement and prevention.

Furthermore, to acquire a management tool and measure the effectiveness of its sustainable development programme, SNF has set up an environmental, social and governance (ESG) reporting structure and protocols including the appointment of an ESG officer at each major subsidiary.

# SUSTAINABLE DEVELOPMENT GOALS

The graphs and tables presented in this report are based on cumulative data collected from the Group's main production sites.

The values are expressed per sales of product produced by all the sites concerned, with 2016 being used as the benchmark year and 100 as the base for monitoring changes since that date.

The raw data used to calculate indices are provided at the end of this document (see Section 5.6).

## 2.1 RISK ANALYSIS

As an economic player, SNF interacts with its social environment through its operations. Identifying and analyzing the impact on its ecosystem form part of its sustainable development approach. This enables the Group to reduce any negative impacts and increase the positive effects of its actions. SNF is committed to a continuous process of mitigating its primary risks. The Group takes the social and environmental impacts of its operations into account, and their impact in terms of human rights and anti-corruption.

**METHODOLOGY**



SNF identifies and conducts a detailed review of the risk of serious infringements of human rights and fundamental freedoms and serious harm to health, safety, and the environment, concerning the Group and its stakeholders. This work supplements existing measures implemented by parent companies as part of their duty of care. Established by the monitoring committee and approved by senior management, the review is performed jointly by the human resources, health, environment, legal, procurement, control and internal audit departments.

SNF identifies and assesses these risks using a combination of sources: generic risks and risks targeted by the Responsible Care program that are specific to the chemical sector, feedback, real-world cases at companies operating in similar activities or scopes, significant issues expressed by stakeholders, and the Group's vigilance plan.

SNF's principal risks and the policies and procedures it implements to mitigate or prevent them are presented in the tables below, including

the results of these policies and the associated performance indicators.

The risks shown apply Group-wide and constitute the main internal and external risks to which SNF was exposed when this document was published. They are categorized according to their likelihood of occurrence or potential negative impact. NB: the themes related to the prevention of food insecurity and food waste, responsible, equitable, and sustainable food, and respect for animal welfare are deemed irrelevant to SNF's activities and are therefore not included.

Risks are routinely updated in line with feedback, progress achieved in preventing and mitigating their impact, and any emerging risks considered relevant.

In every country where SNF operates, local authorities inspect the Group's sites several times a year to check the consistency of its environmental indicators. They also conduct health and safety audits.

Even where local regulations differ, there are equivalent safety standards regarding facilities and staff are applied at all of SNF's plants.

**ecovadis**

In addition to the internal assessment, SNF commissioned EcoVadis to assess customer and supplier risks based on the type and volume of products purchased and sold in the various countries. This analysis covers several areas: environment, social, ethics, and logistics. The final results and recommendations have been used to draw up an action plan, including an assessment of suppliers and customers in terms of the aforementioned risks, within the framework of a responsible procurement procedure. This action plan is revised every year.

SNF has also gathered and formalized its commitments to which its partners and subcontractors must adhere in its "Responsible Purchasing Charter" while its internal "Responsible Purchasing" policy has been distributed to the Group's employees.



## 2.2 EMPLOYEE-RELATED RISKS

RISK	REASON	POLICIES IN PLACE	RESULTS	INDICATORS
Non-compliance risk	<ul style="list-style-type: none"> <li>Official warning or criminal sanction</li> <li>Non-compliance with regulations</li> </ul>	Regulatory watch	Site compliance with applicable regulations	% of regulatory compliance
Workplace accident risk	<ul style="list-style-type: none"> <li>Inadequate risk assessment</li> <li>Failure to analyze the risk</li> <li>Workplace accidents or occupational illness:</li> <li>• Insufficient knowledge of instructions</li> <li>• Non-compliance with instructions</li> <li>• Procedure not updated</li> </ul>	<ul style="list-style-type: none"> <li>Professional risk assessment document</li> <li>Annual update of professional risk assessment</li> <li>Prevention and risk management actions and measures recorded</li> <li>Initial training of new hires</li> <li>Continuous training for existing staff</li> <li>Audits and preventive inspections</li> <li>Analysis of all workplace accidents, regardless of severity</li> <li>Recording of all accidents and near-misses</li> <li>Analysis of all reported occupational illnesses</li> </ul>	<ul style="list-style-type: none"> <li>Reduce the number of workplace accidents and occupational illnesses</li> <li>Knowledge and skills development and retention</li> <li>Corporate culture and staff engagement</li> <li>Compliance with health and safety instructions</li> <li>Procedures and documentation kept up to date</li> <li>Avoid repeat workplace accidents</li> <li>Avoid repeat occupational illnesses</li> </ul>	<ul style="list-style-type: none"> <li>% of corrective actions completed</li> <li>% completion of initial training</li> <li>% of refresher courses completed</li> <li>Weekly publication of safety indicators</li> <li>% of planned audits completed</li> <li>Number of spot audits carried out</li> <li>% of workplace accidents analyzed</li> <li>Frequency rate for workplace accidents with lost time, without lost time and minor accidents</li> <li>Severity rate for workplace accidents with lost time</li> <li>Number of occupational illnesses reported</li> <li>Psycho-Social Risks Barometer</li> </ul>

## 2.3 HUMAN RIGHTS RISKS

RISK	REASON	POLICIES IN PLACE	RESULTS	INDICATORS
Human rights Working conditions	Risk of employing staff under poor and non-compliant working and safety conditions. Civil and criminal sanctions Damage to the Group's image	Corporate Social Responsibility policy: <ul style="list-style-type: none"> <li>• Economic: to maintain local jobs and local economic activity.</li> <li>• Social: to ensure optimal working conditions for employees.</li> <li>• Environmental: to minimize the impact of our operations on the environment.</li> </ul> Joining the Global Compact: publicize our actions with respect to the Global Compact's Sustainable Development Goals.	Health & Safety: results for working conditions and workplace safety better than the national average. No convictions for non-compliance with the law in terms of human rights and working conditions.	EcoVadis assessment on this theme. Audits carried out in high-risk countries (India and China).

## 2.4 ENVIRONMENTAL RISKS

RISK	REASON	POLICIES IN PLACE	RESULTS	INDICATORS
Regulation	Regulatory non-compliance Loss of operating licences Fomal Notice Complaints	Regulatory monitoring Audit and action plan ISO 14001-certified sites	Monitoring of new regulation	Local site decree
Industrial risks (SEVESO classification - upper tier or equivalent)	Major industrial accident that could endanger the safety of surrounding communities and Group employees	Safety Management System, risk analysis, process change management Harmonization of safety measures at Group level Processes at our facilities Periodic drills on internal and external emergency plans with the appropriate state/regional/country services (fire brigade, local, national and environmental authorities, etc.)	No industrial accidents at Group level in over thirty years	None recorded
Consumption of resources (water, gas, etc.)	Resource depletion Shortage of supplies at our production sites	Energy saving policy ISO 14001-certified sites Environmental action plan Search for alternatives source of energy	Improved energy efficiency at production facilities Reduction in the amount of wash water Optimization of utilities Increase in the amount of recycled waste Reduction in the amount of waste per tonne produced	Water consumption Energy consumption Natural gas consumption Steam consumption

RISK	REASON	POLICIES IN PLACE	RESULTS	INDICATORS
Industrial pollution risk (internal or external)	Chronic or accidental spillage or release of hazardous substances into the environment	<ul style="list-style-type: none"> <li>Environmental Policy</li> <li>Monitoring atmospheric emissions, effluents and waste production</li> <li>Action plan to reduce atmospheric emissions and effluents</li> <li>Installation of water and air treatment units</li> <li>Site containment</li> <li>Recovery of polluted water</li> <li>Polluted water treatment</li> <li>Procedure for handling emergencies</li> <li>New sites, designed with best available technology</li> </ul>	<ul style="list-style-type: none"> <li>Reduction in the release of hazardous substances into water and air per tonne produced</li> <li>No accidental pollution</li> </ul>	<ul style="list-style-type: none"> <li>CO<sub>2</sub> emissions</li> <li>Volatile organic compound (VOC) emissions</li> <li>Released water discharges</li> <li>Effluents with high chemical oxygen demand</li> <li>Effluents containing suspended solids</li> <li>Effluent nitrogen</li> <li>Dust emission</li> <li>Emission of hazardous solid waste</li> <li>Emission of non-hazardous solid waste</li> <li>Groundwater monitoring</li> </ul>
Weather risk	<ul style="list-style-type: none"> <li>No delivery (raw materials and others) or increase in delay</li> <li>Waste accumulation</li> <li>Water restriction</li> <li>Loss of efficiency on cold maintenance</li> <li>Loss of Utilities</li> <li>Risk of injury (flight)</li> </ul>	<ul style="list-style-type: none"> <li>Capacity of storage</li> <li>Supplier management</li> <li>Water and Utilities management</li> </ul>	<ul style="list-style-type: none"> <li>Anticipation of weather conditions</li> <li>Increase in storage capacity</li> <li>Lightning protection</li> <li>Snow ploughing and salting for road</li> </ul>	<ul style="list-style-type: none"> <li>Capacity of storage</li> <li>Stock update</li> </ul>
Waste accumulation	<ul style="list-style-type: none"> <li>No treatment available or possible</li> <li>Saturated treatment facility</li> <li>Change of regulation</li> </ul>	<ul style="list-style-type: none"> <li>No exclusivity, several waste treatment centres</li> <li>Exchange with the different sectors to adapt/change the treatment of waste</li> <li>Regular departures to treatment centres</li> </ul>	Waste management	Waste indicator with mode of treatment

## 2.5 CORRUPTION RISKS

RISK	REASON	POLICIES IN PLACE	RESULTS	INDICATORS
Responsible procurement Corruption	Risks of violating antitrust laws and anti-corruption rules in the Group's various operating countries.  Civil and criminal sanctions	Code of Conduct and Ethics  EcoVadis assessment of the social and environmental performance of global supply chains  Internal training for staff liable to face these risks	No purchases are classified as presenting a serious risk. Our riskiest purchases are chemicals, due to their environmental aspects.  25% of our sales are considered at-risk, primarily due to the sectors our customers operate in – such as mining or oil – and in relation to the environment or country. However, this is strongly counterbalanced by the use of our products to treat water to preserve the environment and water resources.  Our activities present the potential for significant corruption risk. However, 93% of our suppliers are identified as low risk and 75% of our customers are considered low or medium risk.	Risk map prepared by EcoVadis and used to assess product supply and sales chain stakeholders.

### 3.1 CORPORATE GOVERNANCE POLICY



SNF is an unlisted company with fixed capital. The value of its shares is irrelevant. Furthermore, the Group distributes no dividends.

Shareholders' and management's interests are therefore intertwined in terms of governance. Corporate governance is administered by the Board of Directors, comprising nine members, and executive officers consisting of the Chairman & CEO and three Senior Executive Vice Presidents. These two bodies define and steer the Group's trajectory: they are responsible for its long-term policy and the implementation of its strategy.

SNF intends to boost the effectiveness of its governance by focusing on transparency and encouraging long-term value creation. The Board conducts assessments to identify how it can improve its operation and apply best practices more effectively.

The Board met 7 times in 2021. The average attendance rate at meetings was 94.3%.

### 3.2 COMPOSITION OF THE BOARD OF DIRECTORS

The composition and operation of the Board of Directors are determined by applicable legislation and the Company by-laws. The Company is managed by a Board of Directors comprising ten members, including one independent Board member not related to management. The Board has two women. Board members are appointed by the General Meeting of Shareholders for a maximum term of six years and may be reappointed indefinitely. The goal to diversify the Board of Directors' membership is regularly reviewed in order to promote cultural diversity. As such, the Board includes several current or former business leaders with expertise in fields such as chemistry, finance and corporate social responsibility. The Board also comprises members with significant international experience, and foreign nationals.

The Board of Directors is chaired by Pascal Remy, Group Chairman and CEO. The three Senior Executive Vice Presidents are all Board members.

At 31 December 2021, the Board of Directors comprised the following members:

**Pascal Remy** – Chairman & CEO

**Philippe Lecointre** – CSR, Quality and Chief Compliance Officer

**René Pich** – Senior Executive Vice President

**Richard Saint-Sauveur** – Group Procurement Officer

**Cédrick Favéro** – Senior Executive Vice President

**Thierry Lemonnier** – Director

**Caroline Dumond** – Senior Executive Vice President

**Virginie Malnoy** – Corporate Law Manager

**Peter Nichols** – President of SPCM North America

**John Pittman** – President of SNF Holding Company

### 3.3 QUALIFICATIONS AND EXPERTISE

The Board of Directors believes that the diverse range of skills and backgrounds of its ten members, as well as their personal values, enable it to carry out its tasks with the required independence and objectivity.

Board members have broad-ranging and complementary expertise and high-level experience.

This diversity gives the Group a genuine advantage. Board members collectively contribute a wide range of skills required by the Group’s activities.

They have extensive experience in the chemicals sector and international markets.

Their qualifications and expertise are presented in a table of Board competencies below.

	CHEMISTRY	INTERNATIONAL	CEO	FINANCE	CSR
	90%	70%	50%	50%	40%
Pascal Remy	•	•	•	•	
René Pich	•	•	•		
Cédric Favero	•	•			•
Caroline Dumond	•			•	•
Peter Nichols	•	•	•		
John Pittman	•	•	•		
Philippe Lecointre	•			•	•
Richard Saint-Sauveur	•	•			
Thierry Lemonnier	•		•	•	
Virginie Malnoy		•		•	•

### 3.4 INFORMATION ON MEMBERS

#### Pascal Remy – Chairman & CEO

Pascal Remy, 61, is a graduate of the Massachusetts Institute of Technology (MIT), École polytechnique and École nationale des ponts et chaussées. He has twenty-five years’ experience in the chemicals and water treatment industry. He began his career at Alcatel as head of fibre optic submarine cables before joining the Suez Group as Managing Director of Degrémont, before being appointed Managing Director of Nalco (Ecolab Group) in the US. In 2004, he became a partner in a Chicago-based investment fund. He joined SNF in December 2005 as President and member of the Board of Directors, before being appointed Chairman & Chief Executive Officer in 2010.

#### René Pich – Senior Executive Vice President

René Pich, 81, holds a degree in chemistry from the Institut de Chimie et Physique Industrielle engineering school in Lyon, France (ICPI Lyon). He began his career as a polymerization research technician at Rhodiaceta and Streichenberger before being appointed Technical Director Polyacrylamide at British Petroleum. In 1978, with the acquisition of the W.R. Grace flocculant business, he was appointed Chairman and CEO of SNF, a position he held until 2010. He has held the position of Senior Executive Vice President since then. He has been a member of the Board of Directors since 1978.

**Cédric Favero – Senior Executive Vice President**

Cédric Favero, 46, is a graduate of the Institut textile et chimique de Lyon (ITECH Lyon) and University Claude-Bernard Lyon (UCBL, 1998). He joined SNF in 1999 to conduct research into monomers and coagulants for water treatment. After launching the Saint Avold (France) and Pearlington (United States) plants, he focused his research on new polymer technologies and polymerization in the oil and gas sector, specialty applications and the organic chemistry of monomers and chemicals for the mining industry. He took over responsibility for R&D in 2005, joined the Board of Directors in 2012, and was appointed Senior Executive Vice President in 2015.

**Caroline Dumond – Senior Executive Vice President**

Caroline Dumond, 50, has an engineering degree from École Polytechnique Féminine (EPF). She has held a number of positions as an engineer, Chief Production Officer, Chief Industrial Officer and joint venture manager including at Air Liquide. In 2016, she was certified as a corporate director by Sciences Po Paris and the IFA (Institut Français des Administrateurs). Since 2018, she is CEO and founding partner of Les Premières Sud, a business

incubator promoting inclusion and women's entrepreneurship to help start-ups innovate and grow with high social impact. She is Senior Executive Vice President of SPCM and has been a member of the Board of Directors since 2003. She is the daughter of René Pich.

**Peter Nichols – President of SPCM North America**

Peter Nichols, 71, is a graduate of the University of Toronto. He joined Allied Colloids in 1975 and spent 15 years at the company, eventually becoming CEO. Under the North American Free Trade Agreement, he played a key role in setting up Allied Colloids Americas and was appointed President and member of the Global Executive Committee. Mr. Nichols joined SNF Holding Company in 1999 as Chairman and became a member of the SPCM Board of Directors in 2008.

**John Pittman – President of SNF HC**

John Pittman, 54, is a graduate of the Georgia Institute of Technology and holds an MBA from Warrington College of Business (University of Florida). He has worked in the chemicals industry for over 30 years. He began his career at Vinings (Kemira), where he held various positions before

being appointed Vice President of Sales for the Mining, Oil & Gas markets. He then joined Solvay USA as Regional Market Director, Oil & Gas. He has been President of SNF Holding Company since 2017. He was appointed as a member of the SPCM Board of Directors in 2019.

**Philippe Lecointre – CSR, Quality & Chief Compliance Officer**

Philippe Lecointre, 56, is a graduate of the Institut de chimie et physique industrielles in Lyon (ICPI Lyon). He joined SNF in 1991 and helped set up an ISO 9001 certified Quality Management System. In 2006, he was appointed the Group's Quality Director and later CSR (Corporate Social Responsibility) and Chief Compliance Officer. He joined the Board of Directors in the following year.

**Richard Saint-Sauveur – Group Chief Procurement Officer**

Richard Saint-Sauveur, 71, is a graduate of the École supérieure de commerce de Lille (ESC Lille) and holds an MBA from the École des hautes études commerciales de Paris (HEC Paris). He has worked in the chemicals industry for 40 years. Over his career, he has held technical, sales and management

positions at Roquette, Lafarge, Orkem and Elfatochem. Before joining SNF in 1999 as Group Chief Procurement Officer, he ran the acrylics unit at Elfatochem. He is currently chairman of SNF Korea and manages operations in South East Asia. He has been a member of the Board of Directors since 2011.

**Thierry Lemonnier – Director**

Thierry Lemonnier, 68, graduated from the Ecole Nationale Supérieure de Géologie (ENSG Nancy) and Stanford University (U.S). He began his career in 1979 at Total, where he held various number of positions, including CFO of the Refining branch (1993-1999) and then the Chemicals branch (2001-2006). He then joined Arkema as Group CFO and member of the Executive Committee, where he stayed until his retirement (2006-2018). He was made a member of the SPCM SA Board of Directors in 2019.

**Virginie Malnoy - Corporate Law Manager**

Virginie Malnoy, 40, holds a Master’s Degree from EDHEC Business School and a Master’s Degree from the Faculty of Law and Political Science of Nice Sophia Antipolis. She has worked for 14 years for International law firms in Monaco, her area of expertise being Business Law. She joined SNF in 2019 as corporate law manager for the SNF Group, and has been a member of the Board of Directors since 2021.

**3.5 POWERS AND MISSIONS**

The Board of Directors determines strategic guidelines and overall policies concerning the Company’s business and oversees their execution.

Subject to the powers expressly assigned to the shareholders’ general meeting, and within the scope of the Company’s objectives, the Board discusses all issues related to the running of the Company and makes the required decisions.

The Board also oversees the Group’s strategic development and periodically reviews risks and opportunities,

particularly regarding financial, legal, operational, social, and environmental matters, and the measures adopted accordingly.

Finally, the Board appoints the Executive Directors responsible for managing the Company by its strategy and sees it is implemented.

In 2021, the Board’s discussions and decisions included an Annual Review of Group Strategy and



Financing, the Quarterly Financial Reports and their approval, and the Group’s Corporate Social Responsibility, Sustainability policy, and Risk Management Approach. The Board

also reviewed in details the Capital Expenditure Plan in line with current and expected market growth including health crisis. It has also decided to include a new female member, reflecting the group's efforts to increase the number of women in SNF teams.



# SOCIAL ENGAGEMENT

4.1 STAFF POLICY

4.2 SUSTAINED TALENT MANAGEMENT

4.3 COMMITMENT TO WELL-BEING

4.4 CULTURE OF DIVERSITY



## 4.1 STAFF POLICY



SNF's people are the backbone of its success. They form a unique community in terms of their expertises, professions, nationalities, roles and personalities.



In total, the Group employs 6,900 people in some 50 countries, each of whom contributes to its operation and development, making it the world leader in its field.

Creating the optimal conditions for their well-being and development is an essential priority.

Through its code of conduct, SNF is committed to respecting fundamental principles such as those enshrined in the International Bill of Human Rights and United Nations Global Compact and prohibits any form of child or forced labour whatsoever. The Group pays special attention to the quality of its working conditions. The policy aims to include matters of health, safety, and well-being into the Group's operational strategy as a matter of priority.

A flexible and attentive work organization system helps optimize work-life balance. SNF also ensures

high-quality dialogue with staff, which has resulted in a number of agreements. The Group's employees also share in its long-term growth through generous initiatives.

Finally, a real asset for the Group's global business, **diversity and a broad range of skills and expertise are nurtured and encouraged at every level of employment.** SNF is deeply committed to the principles of recognition and respect, regardless of ones origin, gender, marital status, social background, medical conditions, political opinion, trade union membership, or occupation.

The Group is committed to improving gender balance, developing national and cultural talent, and drawing on different generations to maximize learning, knowledge, and experience.

## 4.2 SUSTAINED TALENT MANAGEMENT

### GRI 102-8 GRI 401 GRI 404 GRI 405-1

Given the highly technical nature of SNF's activities, developing employees' skills and encouraging continued engagement are key issues. The Group ensures that its skills requirements are covered over the medium to long term while helping employees achieve their personal career aspirations. Personal development includes recruitment, career development, and training.

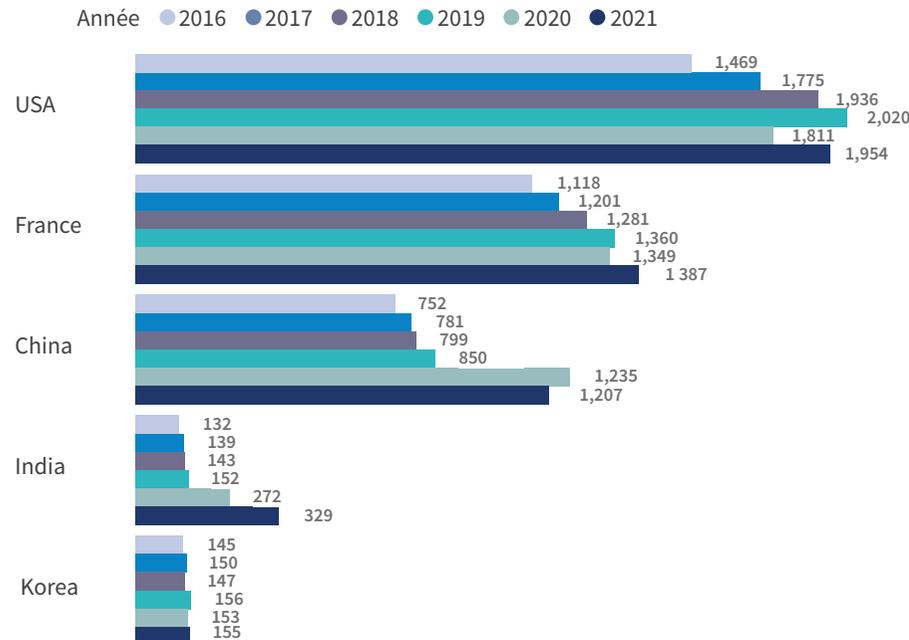
### 4.2.1 HIRING POLICY

The Group's sustainable development relies on its ability to hire the most talented people and offer them opportunities to flourish throughout their careers. The expertise and know-how of these people are essential to the Group's development. **SNF, therefore, pays special attention to developing relationships with universities.** Driven by its duty as a corporate citizen to help train young people and their need to complete an internship as part of their theoretical training, the Group organizes site visits for universities, targeting engineering schools and technical colleges. It offers a variety of opportunities for internships and apprenticeships.

SNF had 49 apprentices and 71 trainees in France in 2021. The goals are to enhance awareness of the Group and its activities and to attract candidates who support the corporate model and share the Company’s values.

We aim to find the best people for the job, people able to integrate into our teams over the long term which will genuinely contribute to our operations. At 31 December 2021, headcount at the Group’s main companies was 5,032,

Change in headcount by country



up 4% from 4,820 a year earlier. The United States and France remain the two regions with the most employees. They are followed by China, reflecting the Group’s growth in Asia.

To support its continued growth, SNF has adopted a proactive approach, in keeping with its diversity policy, designed to attract candidates with varied profiles and ensure a broad range of backgrounds. The Group uses various communication channels, including the professional networking platform LinkedIn, where the accounts of the subsidiaries and affiliate pages have been consolidated.

The SNF website, [www.snf.com](http://www.snf.com), is constantly updated and improved. It presents the Group, its products and its broad range of businesses to the general public. The site’s visuals include and promote diverse profiles to combat stereotypes and help candidates from different backgrounds visualize a rewarding career at SNF. The Group is aiming to increase the number of women in its teams and is drawing on dedicated research to build a future recruitment pool (see 4.3.2. “Gender Equality”).

HEADCOUNT BY AGE BRACKET	2021									
	WOMEN					MEN				
	<25	25-29	30-39	40-49	>50	<25	25-29	30-39	40-49	>50
France	21	16	52	46	24	49	169	371	335	304
China	8	42	180	181	19	14	64	289	330	80
South Korea	0	8	6	0	0	0	19	42	49	31
India	2	2	2	1	0	53	78	128	45	18
USA	27	65	91	68	86	117	204	414	379	503

HEADCOUNT BY AGE BRACKET	2020									
	WOMEN					MEN				
	<25	25-29	30-39	40-49	>50	<25	25-29	30-39	40-49	>50
France	16	19	50	37	28	48	176	366	340	269
China	6	45	168	174	22	23	77	310	335	75
South Korea	0	7	6	1	0	0	20	45	46	28
India	2	1	3	1	0	38	74	103	37	13
USA	20	65	94	65	84	98	183	389	347	466

HEADCOUNT BY AGE BRACKET	2019									
	WOMEN					MEN				
	<25	25-29	30-39	40-49	>50	<25	25-29	30-39	40-49	>50
France	15	16	45	40	24	63	192	372	341	252
China	7	26	134	141	8	16	43	196	248	31
South Korea	1	6	6	0	1	1	22	44	45	30
India	0	1	1	0	0	9	23	77	26	15
USA	30	79	68	108	68	143	469	255	413	387

HEADCOUNT BY AGE BRACKET	2018									
	WOMEN					MEN				
	<25	25-29	30-39	40-49	>50	<25	25-29	30-39	40-49	>50
France	12	15	47	36	23	70	178	342	328	230
China	12	29	116	117	3	20	53	205	222	22
South Korea	1	7	4	0	0	1	22	39	53	20
India	0	1	1	0	0	3	23	74	28	13
USA	30	61	115	65	72	151	239	388	369	446

HEADCOUNT BY AGE BRACKET	2017									
	WOMEN					MEN				
	<25	25-29	30-39	40-49	>50	<25	25-29	30-39	40-49	>50
France	14	12	36	33	21	74	163	312	323	213
China	9	44	100	100	1	24	72	223	198	10
South Korea	0	9	3	0	0	6	24	35	61	12
India	0	1	1	0	0	7	22	69	31	8
USA	15	46	88	64	71	101	213	370	352	455

HEADCOUNT BY AGE BRACKET	2016									
	WOMEN					MEN				
	<25	25-29	30-39	40-49	>50	<25	25-29	30-39	40-49	>50
France	11	17	31	30	18	64	151	291	320	185
China	7	62	89	80	2	19	91	220	174	8
South Korea	2	6	3	0	0	7	21	34	61	11
India	0	1	1	0	0	12	26	58	26	8
USA	2	23	77	59	73	25	132	306	330	442

The breakdown workforce by age bracket shows an overall stability among the 30-49 age group, a sign of employee loyalty.

The Group has an internal pool of employees who can be called on to replace some of those expected to retire over the next ten years.

Personal development programs and training enable the necessary transfer of skills (see 4.2.2. “Career Management Policy” and 4.2.3. “Training Policy”).

Headcount rose 149% in India versus 2016 following the opening of a new site in Gandhidham. It also increased in the United States (up 33% vs 2016), France (up 24% vs 2016), and South Korea (up 7% vs 2016).

HEADCOUNT BY COUNTRY	2016	2017	2018	2019	2020	2021
France	1,118	1,201	1,281	1,360	1,349	1,387
China	752	781	799	850	1,235	1,207
South Korea	145	150	147	156	153	155
India	132	139	143	152	272	329
USA	1,469	1,775	1,936	2,020	1,811	1,954

HEADCOUNT BY PROFESSIONAL STATUS	2016		2017		2018		2019		2020		2021	
	Management	Employees										
France	478	640	533	668	560	721	601	759	621	728	629	758
China	503	249	511	270	501	298	537	313	876	359	883	324
South Korea	36	109	40	110	39	108	70	86	67	86	70	85
India	27	105	39	100	31	112	35	117	137	135	197	132
USA	489	980	567	1,208	606	1,330	669	1,351	645	1,166	690	1,264

**4.2.2 CAREER MANAGEMENT POLICY**

The career management policy offers career paths that strengthen the expertise of individual employees and the Group as a whole. It enables employees to diversify their experience as part of their professional careers and constantly develop their skills. Internal promotion is one of the best ways to ensure the transmission of know-how and corporate culture. It is an important recruitment source when a position becomes vacant, and effective tool for employee development. **The internal promotion rate at SNF Group has more than doubled since 2016.**

The career management policy is tailored to each Group entity’s specific standards and needs, based on the same principles. Regardless of status, country, age, or gender, SNF gives all employees the means to steer their careers, offering support at every stage. The Group, therefore, applies a proactive internal promotion policy. It identifies and develops the potential to encourage employees to take on new responsibilities and further their professional development.

Employees at the Group’s main companies also have the opportunity to discuss matters with their superiors during an individual annual meeting. This meeting

provides an opportunity to review employees’ career paths, expectations, and occupations to develop their potential. Managers also review any training courses completed and, based on this review, set training objectives for the coming year to further enrich the employee’s knowledge and skills (see 4.2.3. “Training Policy”). The Group’s mobility policy puts employees at the helm of their development, with Human Resources coordinating and supporting the process.

**4.2.3 TRAINING POLICY**

**Along with internal promotion, training is a crucial means of supporting employees throughout their careers with the Group.**

It is used to onboard new employees, developing management skills, and acquire know-how and expertise in fast-changing professions. The training program reflects the Group’s cumulative needs for future growth, internal promotion requirements, and employee aspirations expressed during performance appraisals and career reviews.

Vocational training is provided to all employees, regardless of their profession, level of responsibility, and age. It helps employees acquire or develop the skills they need for their current position or prepare for a new one, besides helping the Company meet its expectations regarding technical expertise or

managerial practice.

**Specific programmes are designed for employees to develop their skills in Safety, the Environment, Group Business lines and Management.**

Some training courses where the acquired skills are tested can verify the trained employees’ ability to apply their skills independently. SNF also organizes training courses for sales teams, providing expertise in



the sales process and customer relations.

Another critical challenge is integrating Sustainable Development into all employees' professional skills.

**Sustainable Development Strategy is rolled out Group-wide. It is based on raising awareness and empowering employees.**

Wherever the Group operates, it is embodied by Sustainable Development Managers, HSE Officers and Business Line Representatives.

SNF's strategy is set out in a series of internal training modules. The business lines also encourage employees to learn about the environmental impacts of their activities.

In 2021, SNF conducted 305,216 hours of training for its employees (up 71% versus 2016), including 164,040 hours in the United States, 98% of which comprised Health, Safety, and Environment (HSE) training. In France, 58,938 hours were provided (up 35% versus 2016). HSE training accounted for 19% of the total. In China, 73,579 hours were provided, up 22% versus 2016. 62% of training was devoted to HSE.

Safety training is mandatory in all Group companies and is renewed in recurring 2-4 year cycles depending on the accreditation (Electrical, Safe Driving Skills, etc.).



TRAINING (in hours)	2016	2017	2018	2019	2020	2021
<b>SNF France</b>						
Total	43,654	49,124	52,541	52,735	60,191	58 938
Total per employee	39	41	41	39	45	42
Total hours of HSE training	10,233	11,100	9,067	13,480	10,374	11 298
<b>SNF China</b>						
Total	60,317	49,278	31,087	42,867	77,445	73 579
Total per employee	80	63	39	50	63	61
Total hours of HSE training	31,963	28,053	22,792	32,481	53,958	45 887
<b>SNF Korea</b>						
Total	4,209	4,570	5,135	4,365	3,000	5 027
Total per employee	29	30	35	28	20	32
Total hours of HSE training	2,175	3,078	3,730	2,265	1,871	3 152
<b>SNF India</b>						
Total	1,302	2,023	2,721	3,248	3,766	3 632
Total per employee	10	15	19	21	14	11
Total hours of HSE training	1,060	1,635	2,217	2,680	2,940	2 658
<b>SNF USA</b>						
Total	68,589	160,541	152,246	197,660	84,936	164 040
Total per employee	47	90	79	98	47	84
Total hours of HSE training	57,137	148,439	139,246	183,472	81,540	159 991

### 4.3 A RESOLUTE COMMITMENT TO WELL-BEING

GRI 102-41 GRI 103 GRI 407 GRI 430-2 - GRI 430-9



As a responsible industrial company committed to UN Sustainable Development Goal 3, “Good Health and Well-Being”, SNF prioritizes health, safety and well-being in its operational strategy and industrial activities.

The Group takes a highly demanding approach to the quality of working conditions. It aims to enable everyone to grow and find meaning in their work, not just by preserving their health and safety but by providing them with a pleasant working environment. Achieving this objective requires various initiatives aimed enhance the quality of working life and reconcile private and professional life, plus a more stringent and vigilant view of occupational health and safety.

#### 4.3.1 HEALTH AND SAFETY POLICY

The main risks of serious harm within the Group concern the safety of people, exposure to chemicals, and process safety. SNF’s risk management policy for personnel is based on **prevention, an integrated**

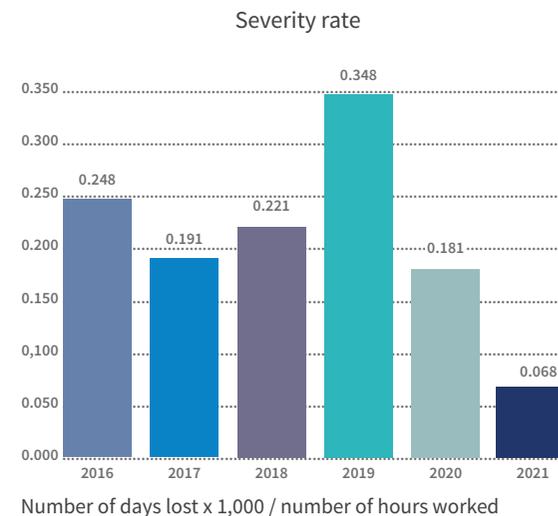
**management system and the promotion of a health and safety culture.** With its prevention and continuous improvement approach, SNF strives to ensure good working conditions for everyone, mainly through workstation risk and accident typology analyses. There has never been a fatal accident involving Group’s employee since the company was founded.

The Group sets the **same demanding standards for the personnel of external partners** working on its industrial sites as it does for its employees. Safety performance indicators include the workplace accident rate for both SNF employees and those of other companies.

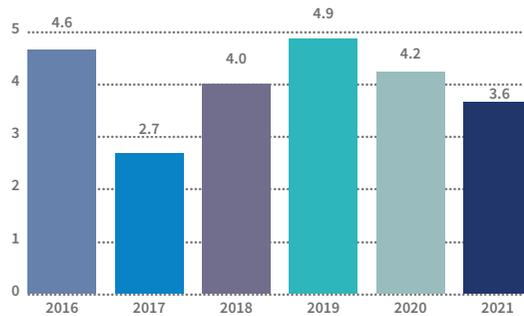
All SNF personnel participate in the Group’s awareness-raising initiatives dedicated to developing a safety culture. The behavioural approach is a significant focus of risk control and prevention. It promotes a sense of commitment: everyone becomes aware of their responsibility and the importance of their behavior. The primary external companies worldwide are involved in the workstation best practice days organized by SNF.

These important events occur with the presence of local HSE staff, the contract manager and the sales

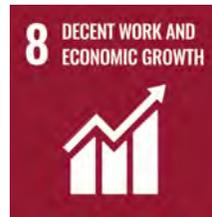
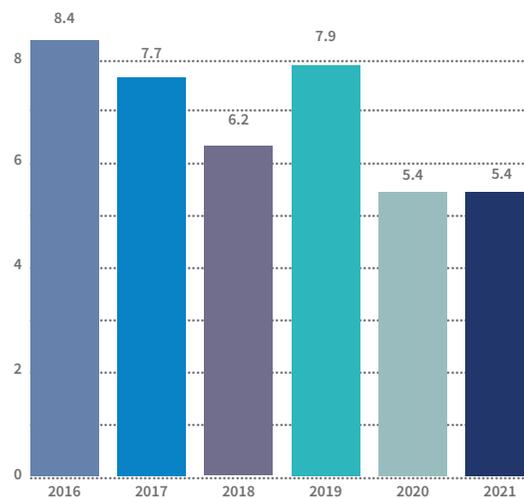
manager of the external company. Sessions are also organized to inform people about the rules that must be followed and applied without compromise. Other initiatives round out the system. They include general HSE training, which employees receive on joining the company, employee training, and awareness-raising on the main characteristics of the site where they work, the consequences of their actions, and operational control of emissions of all kinds (handling chemicals, gestures, and postures, etc.), specific training on the transport of hazardous materials or crisis management, for instance, and field activities such as safety tours and evacuation and emergency drills with the fire brigade.



Frequency of Lost Time accidents per Million Hours Worked



Total Number of Reportable Accidents per Million Hours Worked



Regarding its products and responsible management thereof, SNF ensures that they do not pose a threat to health and safety from the Design Phase onwards.

To that end, research on toxicity is conducted regularly, with the support of experts in regulations, physical chemistry and toxicology. Employees potentially exposed to toxic or hazardous substances in the course of their work receive appropriate medical care. The Group organizes regular initiatives to prevent arduous work, in particular with a programme dedicated to workstation ergonomics. In France, for instance, a qualified ergonomist is involved in projects from the design to the start-up phase. In design projects, the ergonomist participates in regular reviews organized by the manufacturing engineering project managers, to help the designers in their design choices.

The aim is to understand the situations of use through observations in work situations and interviews with the operators concerned to bring out the needs of the operators related to the functionalities of the future system, the characteristics of the equipment, the organization, and the training. The ergonomist also elaborates future activity scenarios thanks to the simulation approach or to put the design choices to the test of the users' logic. The ergonomist also establishes diagnoses in existing work situations. The methodology used is based on

the analysis of the work, to evaluate the constraints and possible effects on the health and safety of the operators.

### 4.3.2 ORGANIZATION OF WORKING TIME AND HOURS

A work organization consistent with both commitment and performance is defined in agreement with employee representatives. Working time is managed by each entity in compliance with the regulations in force, to **optimize work-life balance**.

The Group's work organization provides for full-time positions. SNF respects the limits on working time. The specific nature of the Group's industrial activities means that some employees work shifts while others are on call. In France, 60% of the workforce works shifts; some technical and safety duties come with extra pay or time off in lieu. In addition, in the event of an increase in business activity or particular difficulties, SNF may use fixed-term contracts, overtime, subcontractors, or temporary staff in accordance with local legislation.

### 4.3.3 SOCIAL DIALOGUE

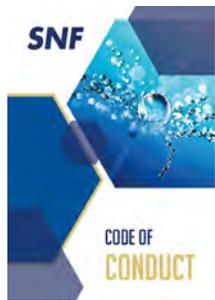
SNF constantly strives to implement and guarantee quality social dialogue and freedom of expression for its employees. Social dialogue, which involves collective bargaining and, in some countries, the daily involvement of employee representatives in various projects, is essential to the functioning of the Group's

companies.

It is organized on a country-by-country basis consistent with local laws and regulations. Local bodies may be created, in countries where legislation does not provide for staff representatives.

**SNF's ethics charter confirms its commitment to the International Labour Organization (ILO) conventions,**

particularly on the issue of freedom of association. In all the countries concerned, the policy ensures that the principles of freedom of association, collective bargaining and the right to strike are respected, in compliance with local regulations. SNF does not restrict these fundamental workers' rights. Indeed, the Group encourages ongoing dialog with employee representatives within each of its constituent entities.



In France, social dialogue is built around the Social and Economic Committee (SEC) chaired by the CEO of SNF SA. The committee met 11 times in 2021 to discuss social, financial, and strategic issues. The SEC

is assisted by expert committees dedicated to health & safety, training, professional equality, the economy, and company benefits.

In China, all SNF employees are covered by a collective bargaining agreement. Worker representatives survey employees to gauge their needs and expectations, which are then discussed at quarterly meetings. The union president represents employees in negotiating annual agreements covering pay, working hours, rest and holidays, occupational health and safety, the protection of women, social welfare cover, well-being and professional training. In the United States, 32% of the employees are covered by a collective bargaining agreement negotiated by a national union and its local council. The collective bargaining agreement cover issues including pay, training and promotion, benefits, uniforms, reimbursement for shoes and eye wear, employee and process safety, and quality of life at work. In South Korea, all SNF employees are covered by a collective bargaining agreement.

Altogether, more than 70% of the Group's employees are covered by collective bargaining agreements on working conditions in 2021.

**4.4 CULTURE OF DIVERSITY**

**GRI 403-10**



As part of its policy of non-discrimination and promotion of professional equality and diversity, SNF constantly fights discrimination based upon age, ethnicity, ancestry, gender, national origin, disability, medical condition, race, size, religion, sexual orientation, socioeconomic background,

family responsibilities, political opinion or any other status prohibited by applicable law. Human resources managers are trained in prevention in this area, and ensure compliance with the principles of equal treatment laid down by law and in international conventions. The Group only recruits its employees based on its needs and the candidates' intrinsic qualities, as defined in its Code of Business Conduct and Ethics.

In hiring, emphasis is placed on the candidate's personality: a sense of community, a spirit of curiosity, insistence on quality and attention to results are key criteria. These character traits play a decisive role in the future employee's ability to enrich the company's



purpose while participating in the strong internal collective spirit.

SNF also reviews job descriptions to preserve equality and business consistency, and pay reviews to ensure fairness.

#### 4.4.1 DISABILITY AND INTERNATIONAL DIVERSITY

SNF ensures the integration of employees with disabilities, notably through adapted training and the design of specific workstations. Hiring procedures make it possible to offer persons with disabilities a range of employment opportunities in France and internationally, depending on the particular features and regulations of the Group's countries. Each of the Group's subsidiaries is committed to helping all sites

make progress in integrating people faced with a temporary or long-term disability and keeping them at work. In France, this approach is managed by the Human Resources department in conjunction with the Occupational Health unit, which participates in dedicated recruitment forums and maintains links with specialized organizations. In addition, **in keeping with its geographical growth strategy, the Group seeks to promote the proportion of local labor in its teams and management**, a decisive factor in the performance of its teams and the attraction of talent. In SNF's host countries, local skills and know-how are favoured at all levels right up to senior management and positions with executive responsibilities.

#### 4.4.2 GENDER EQUALITY

SNF puts great emphasis on gender equality and ensures that women, who, in the past, have not made up a large contingent in the chemicals industry, benefit from pay conditions and career development opportunities in line with those of their male counterparts. In France, the Group applies the Agreement on Gender Equality and Diversity signed on 2 July 2019 and is due to be revised in 2022. Among other aspects, this agreement covers recruitment and integration, pay and promotion, access to training and work-life balance. The Gender Equality Index has been a mandatory indicator, in France, since 2019. SNF obtained a score of 89/100 in 2021.

**The number of women has been growing steadily within the Group since 2016, with an increase of 59% over five years (compared with 35% for men).** With increases of 79% compared to 2016 and 44% (compared to 31% for men) respectively, the Chinese and US sites have recorded the biggest improvement. In France, the increase is 49%

HEADCOUNT	2016		2017		2018		2019		2020		2021	
	Women	Men										
France	107	1,011	116	1,085	133	1,148	140	1,220	150	1,199	159	1,228
China	240	512	254	527	277	522	316	534	415	820	430	777
South Korea	11	134	12	138	12	135	14	142	14	139	14	141
India	2	130	2	137	2	141	2	150	7	265	7	322
USA	234	1,235	284	1,491	343	1,593	353	1,667	328	1,483	337	1,617

(compared to 21% for men). The proportion of women has been edging up since 2016. The Group continues to take action to improve this outcome.

To promote change, SNF is pursuing its policy of awareness-raising and communication within the Group. Particular focus is placed on increasing the representation of women in governing bodies and in senior and middle management positions. The topic, and with it that of career support for women, is examined during the Board of Directors' annual review of human resources requirements.

#### 4.4.3 DIVERSITY AND EQUALITY WITHIN ENTITIES

As part of its social policy, in view of the situation and development of employment, the Group is developing dialogue within each of its entities, taking local cultural and legal aspects into account.

In the United States, the Group strives to offer the same career opportunities to all employee, based on merit, qualifications, and skills. This policy applies to recruitment, job assignments and other events affecting the employment contract. It is set down in the Employee Handbook given to each employee.

In China, SNF ensures that there is no discrimination based on ethnic origin, gender, age, or nationality, in

accordance with the regulation in force. In the event of discrimination or harassment, Human Resource provides employees with the means to blow the whistle and deals with the complaint immediately. In Jiangsu province, where our Taixing and Rudong plants are located, SNF applies to the “special regulations on labor protection of Female workers” to protect women at work.

In South Korea, pursuant to legislation applicable to companies, the Group prohibits any discrimination between employees, regardless of their status or disability. Training is regularly organized, particularly in connection with preventing risks of harassment in the workplace.

Lastly, in India, SNF complies strictly with anti-discrimination laws in force. The Group has a non-discrimination policy included in its administration manual to ensure that employees have the same professional opportunities based on merit, qualifications, and skills.





# ENVIRONMENTAL CONDUCT

5.1 ENVIRONMENTAL POLICY

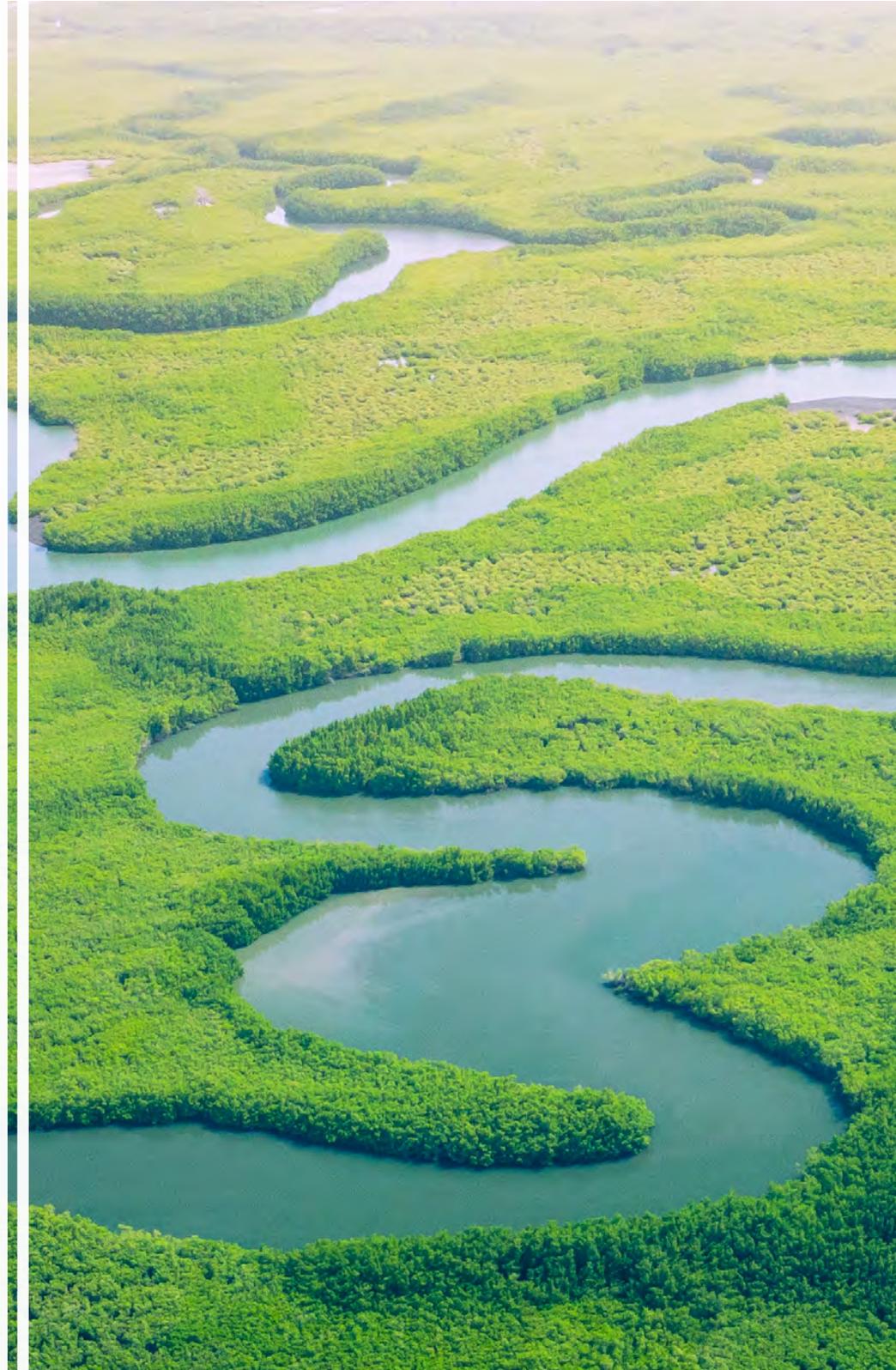
5.2 PREVENTION OF POLLUTION AND WASTE MANAGEMENT

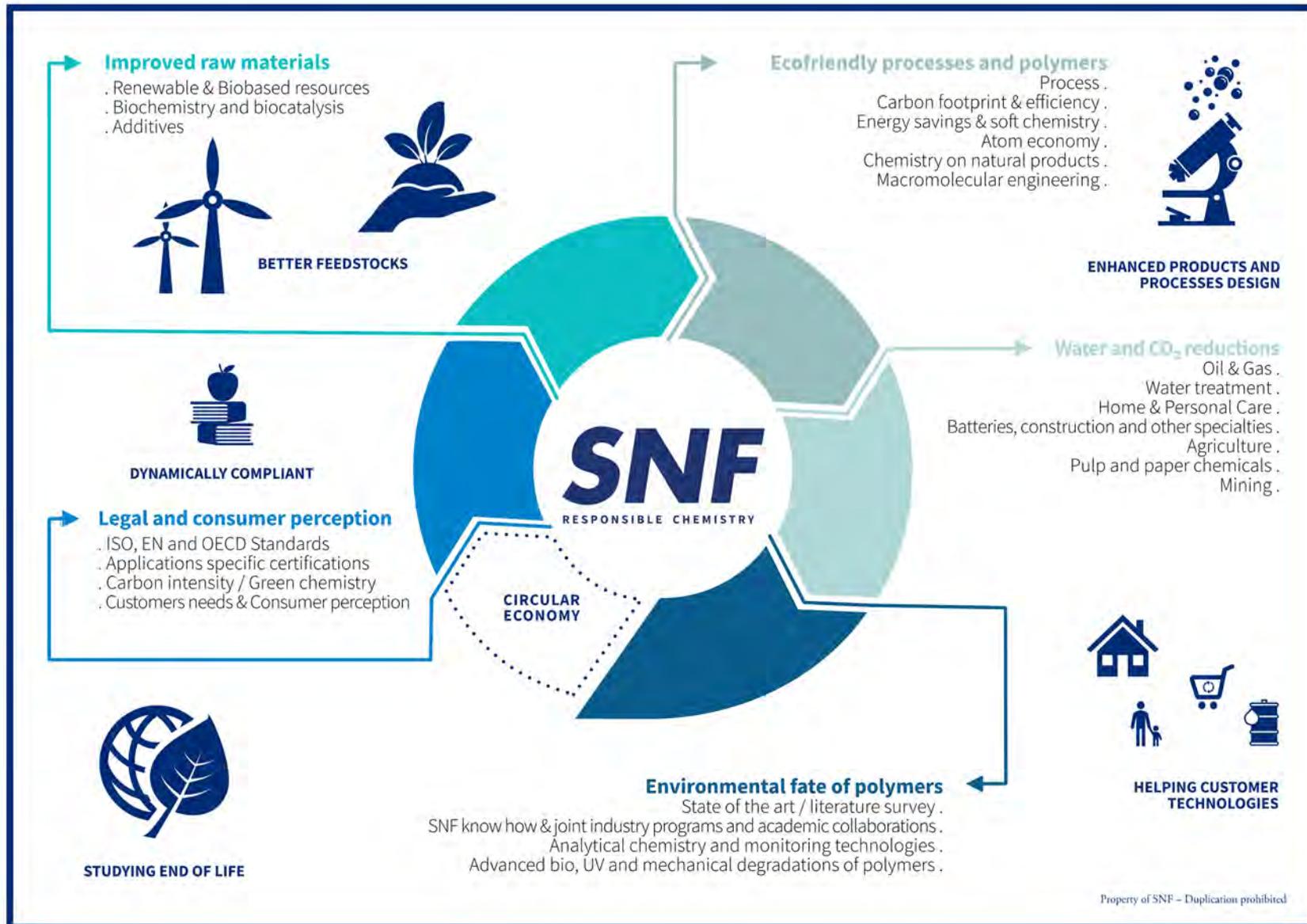
5.3 SUSTAINABLE USE OF RESOURCES

5.4 OTHER INITIATIVES IN FAVOUR OF BIODIVERSITY

5.5 RATIOS PER TONNE PRODUCED

5.6 GROSS VALUES OF THE MAIN ENVIRONMENTAL INDICATORS



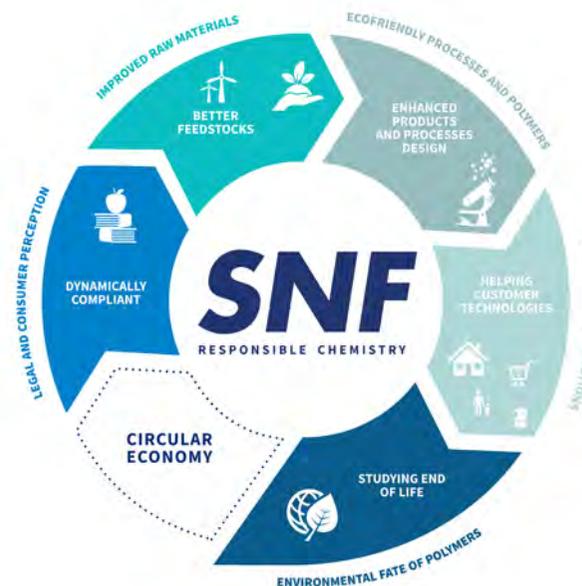


## 5.1 ENVIRONMENTAL POLICY

The chemical industry is coming under increasing pressure to factor sustainability concerns into its activities. Mounting expectations in terms of the environment, social issues and governance show how important it is to consider these aspects in value creation. The Group is committed to continuous improvement and operational excellence.

**SNF Responsible Chemistry reflects the Group's goal of being one of the most exemplary chemical producers regarding environmental footprint.**

SNF is also committed to the Responsible Care® approach at all of its sites. Built on the principle of continuous progress, this resolute initiative in the chemical sector involves the responsible management of operations and products throughout the life cycle, promoting their role in improving quality of life and furthering sustainable development. The Group is modifying its industrial practices to reduce its environmental footprint and act in favour of the climate. The aim is to control emissions and the consumption of non-renewable raw materials,



water, and energy, and to protect soils. While rigorously monitoring emissions and waste, the Group implements appropriate recovery and recycling initiatives in a circular economy approach. From the design stage of manufacturing units, environmental considerations are factored into the choice of processes and equipment. The Group's innovation policy and investments in this area enable it to create sustainable solutions, whether in terms of production technologies or products and their applications.

For several years, the process of designing and developing new products has incorporated the five pillars of the SNF Responsible Chemistry approach:

- LEGAL AND CONSUMER PERCEPTION

Ensuring that every raw material, intermediate and final product, and process technologies, comply with regulation and customer vision.

- IMPROVED RAW MATERIALS  
Materials and energy inputs should be renewable rather than depleting.

- ECO-FRIENDLY PROCESSES AND POLYMERS  
Leading vital initiatives with continuous improvement of our workshop design for enhanced products.

- WATER AND CO2 REDUCTIONS  
Evaluating the benefits of our technologies in terms of preserving resources and reducing carbon footprint.  
HANDPRINT

- ENVIRONMENTAL FATE OF POLYMERS  
Evaluating, understanding, and improving the fate and behavior of our polymers in the environment.  
84% of R&D projects in 2021 concern at least one of the five pillars of the SNF Responsible Chemistry approach.

R&D members of the SNF Group have published an article on Molecules, an open access journal by MDP, on how the polyacrylamide industry is reducing environmental footprint through utilizing bio-based raw materials and monomer manufacturing improvements, as well as the environmental fate of these polymers and how they reduce end-use energy consumption and carbon dioxide emissions:

<https://www.mdpi.com/1420-3049/27/1/42/htm>

**5.2 PREVENTION OF POLLUTION AND WASTE MANAGEMENT**



**GRI 303-4 GRI 305-1 GRI 305-2  
GRI 306-2 GRI 305-7 GRI 306-1**

SNF has a proactive policy of controlling and reducing the impact of its operations on atmospheric emissions, discharges into water and soil, and the production of waste and hazardous substances introduced into the value chain. These reductions involve optimizing raw materials, energy and natural resources. They also include improvements in production units, process modifications, and the installation of effluent treatment units, plus the development of new know-how and patents.

**5.2.1 ATMOSPHERIC EMISSIONS**

**Climate change**

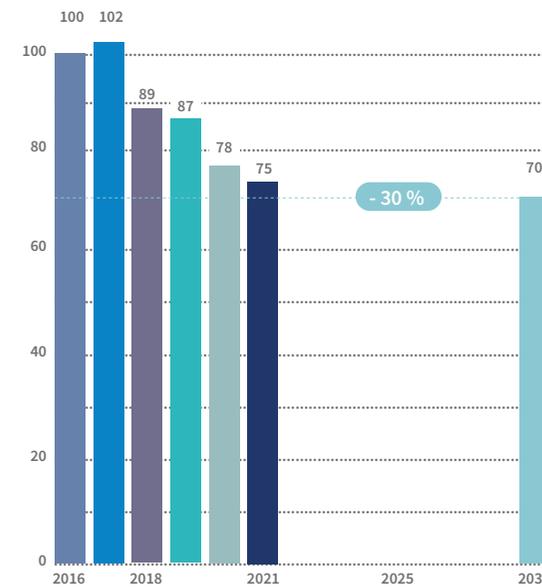
SNF's climate policy is aimed at reducing greenhouse gas (GHG) emissions generated by the Group's industrial operations (direct emissions) and energy consumption (indirect emissions). To that end, SNF carries out rigorous monitoring: site discharges are identified and quantified by type to bring them below the applicable local emission limits. To calculate the

impact of discharges on climate change, emissions are converted from metric tonnes to CO<sub>2</sub> equivalent.

**To reduce its impact on global warming, SNF has implemented a series of measures, including NH<sub>3</sub> refrigeration units and low-NO<sub>x</sub> burners.**

The Group is thinking about new projects such as recovery of fatal heat and heat pump installation.

CO<sub>2</sub> emissions (scope 1 + 2)



Scope 1 & 2 GHG emissions per revenues continues to decrease in 2021 versus the previous year.



SNF is continuing its efforts to reduce emissions via the introduction of dedicated treatment systems, including systematic searches for on-site leaks and the replacement of boilers with more efficient equipment. For example, compressed air for instrumentation and processes accounts for an average of 10% of a manufacturing site's electricity consumption. SNF has therefore taken action to reduce compressed air leaks by installing a system that allows them to be detected by ultrasound. They are then repaired by the plant maintenance department.

SNF has also developed a waste heat recovery system. Where possible, waste heat from air compressors is recycled back into the process or used to heat the building in winter. An external audit identified faulty steam traps that had not been included in the maintenance follow-up. It reduces heat loss and the ensuing gas consumption.

Similarly, steam traps are systematically maintained. Used to maintain good quality steam, they are also tested by ultrasound and faulty traps are replaced. A faulty steam trap can result in steam loss and increased gas consumption.

**The Group is also gradually introducing refrigeration units using NH<sub>3</sub> (ammonia), which has no greenhouse effect and is harmless for the ozone layer.**

These refrigeration units have a performance coefficient 30% greater than units using other refrigeration gases. On dryers in powder manufacturing units, the heat of the air used for drying is recovered via an exchanger. The heated air is fed into the burner unit, which reduces gas consumption by burners. In another example, defective motors are replaced with high-efficiency motors, thereby reducing electricity consumption by up to 12%.

SNF aims to continue improving its energy efficiency and energy mix, and its involvement in the supply chain. For instance, to reduce air / nitrogen leaks and the ensuing electricity consumption, SNF is testing a pilot to follow the air / nitrogen consumption in one of its workshop in its Andrézieux-Bouthéon pilot site in France.

**SNF is also striving to adjust its product offering by developing solutions that contribute to reduction of greenhouse gas emissions.**

The Group has therefore modified its emulsion manufacturing process. The chemical reaction is now carried out in a vacuum, which reduces the boiling point and ensures effective heat removal. As a result, energy consumption for cooling is 12 times lower than in the former atmospheric process.

In the powder manufacturing process, SNF has substituted all of the volatile organic compounds used in its lubricant compositions in order to reduce the VOC emissions associated with the lubrication required at various stages of the manufacturing process. This substitution is currently underway at all Group sites.

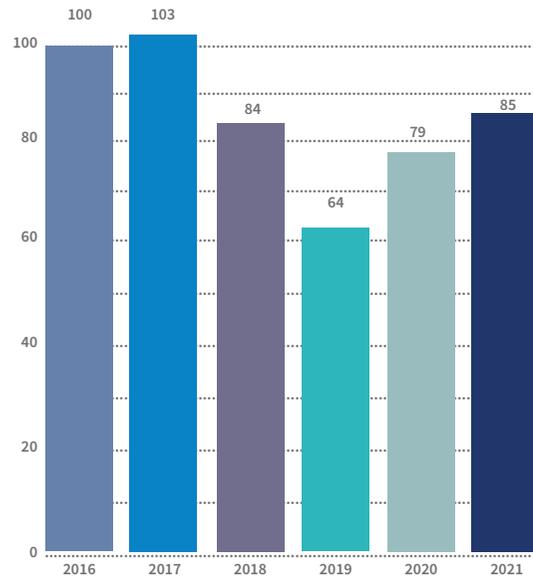
Another example is the new cold process cosmetic emulsion (NATURSOL™) developed by SNF, which cuts 70% off manufacturing time and reduces CO<sub>2</sub> emissions by 96% compared with hot process emulsion.



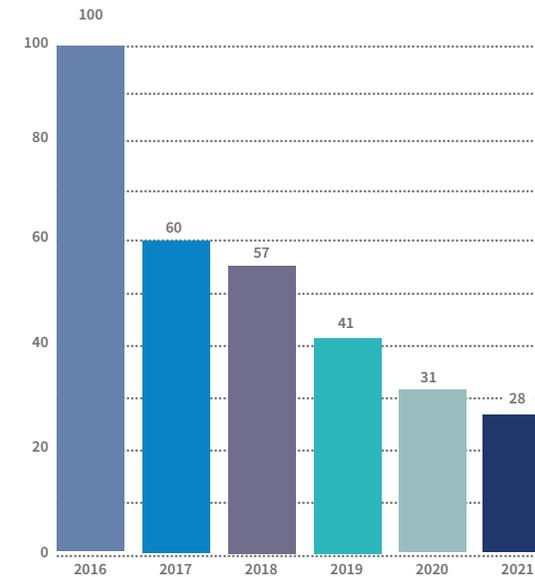
**Air quality**

SNF has an active policy of controlling and reducing its emissions of volatile organic compounds (VOC), substances responsible for air acidification (nitrogen oxides and sulphur dioxide) and dust. The plants are implementing various measures as part of the Group’s environmental plan. Effluents containing VOCs are collected and treated. Most production lines are equipped with water scrubbers to purify gaseous emissions. Thermal oxidation is the most efficient and widely used solution. The polluting compounds are heated to high temperature in a combustion chamber and fully oxidized to the state of inorganic compounds.

Dust



VOC Emissions



SNF follows VOCs and dust emitted by the powder workshops, data available for all Group sites. Dust is correlated with powder operations. The quantity increased by 5% due to the increase of the production of powder products. For air acidification, nitrogen oxide (NOx) emissions from SNF’s operations main result from burning fossil fuels. Reducing these emissions requires improvements such as installing effluent treatment units and process modifications, in addition to optimizing the Group’s consumption of raw materials, energy and natural resources, thereby limiting discharges and waste production (see 5.3. “Sustainable Use of Resources”).

**5.2.2 EFFLUENTS**



SNF’s water management policy aims to maintain the high quality of the lakes into which effluents are discharged and to control and reduce emissions of chemical oxygen demand (COD) and suspended solids (SS) caused by the Group’s operations.

**The goal is to minimize the impact on populations and biota**, i.e. all living organisms (flora, fauna, fungi, micro-organisms, etc.) present in a specific habitat. COD, expressed in metric tonnes per annum, is the quantity of oxygen-consuming substances. This mostly dissolved organic matter contributes to the eutrophication of water.

Suspended solids, expressed in milligrams per litre, are very fine suspended particles, organic or mineral, responsible for water turbidity. They prevent the penetration of the light necessary for aquatic life.

Through improved reporting, SNF ensures compliance with applicable laws and regulations, as well as regulatory developments, such as the CWW BREF in Europe, on the best available techniques and

associated emission threshold values. The Group makes targeted investments dedicated to optimizing water use and its treatment, from the initial design of its facilities to their day-to-day operation.

Where appropriate, SNF also carries out preliminary treatment to lighten the COD load on wastewater treatment plants or discharged into the natural environment.

SNF also limits chemical treatment in cooling towers by prioritizing treatment by ultraviolet rays and hydrogen peroxide at most of its manufacturing facilities. The purging of these process waters is at the heart of the active R&D development policy to evolve

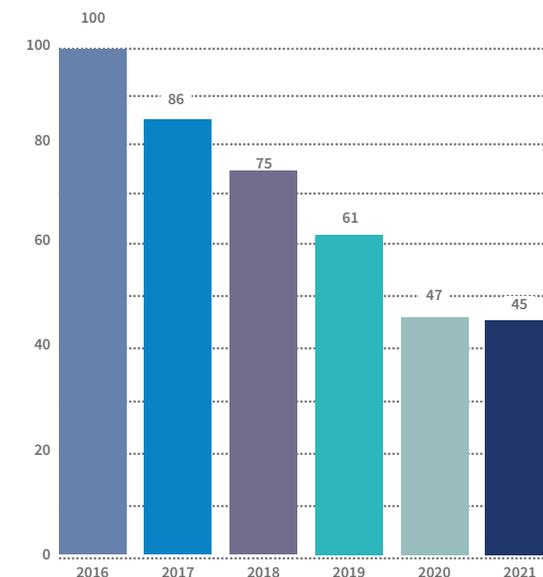
the product mix and able to recycle water as a carrier water in SNF products.

For example, SNF has carried out a number of initiatives at its Andrézieux-Bouthéon site in France to deal with discharges of aqueous effluents. **Ultra high-pressure nozzle systems have been installed to wash emulsion workshop reactors**, replacing steam cleaning. This has resulted in an 80% reduction in water consumption and discharge in buildings fitted with the new equipment in France. These systems are gradually being installed at other Group sites. Released water from cooling tower or from biological treatment plant are tested to be used in final products.

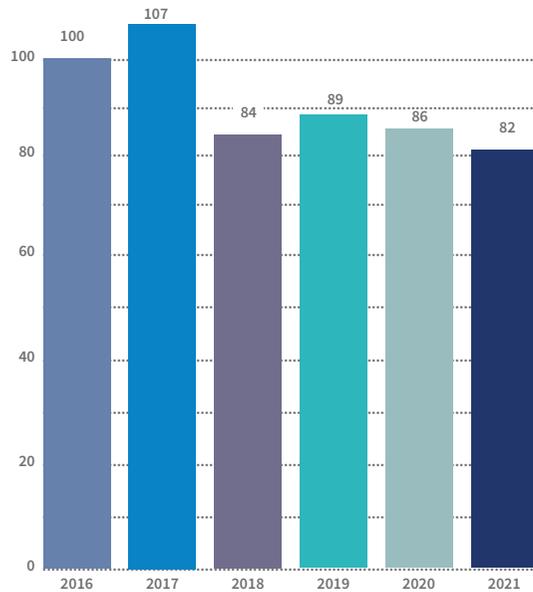
SNF has also built a **biological treatment plant to reduce the overall pollutant load** of the site's discharges. The recycling of treated wash water for reactors has made it possible to save approximately 200 cubic metres per week, while the installation of physico-chemical treatment has enabled solid/liquid separation of ultra high-pressure wash water discharges, which carry large amounts of matter. In 2021, an equivalent plant has been installed at SNF's Plaquemine site in Louisiana, USA, and will eventually allow for in-house treatment of water that was transported by tanker. SNF is committed to equipping future sites with equivalent water treatment technology.



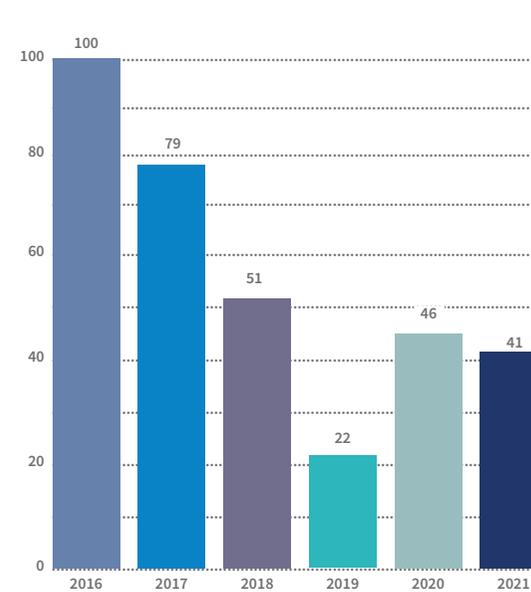
COD (Chemical Oxygen Demand) of Released Water



Nitrogen Content of Released Water



Suspended Solids in Released Water



Some water parameters (Suspended Solids, for example) are not measured regularly, and monthly or quarterly readings can vary considerably depending on the samples taken.

### 5.2.3 WASTE AND HAZARDOUS SUBSTANCES

Waste production is inherent to SNF’s operations, but the company takes care to control it right from the design stage of its products and processes. Hazardous industrial waste and the hazardous substances marketed are central to the Group’s risk management and mitigation policy, combined with sustainability challenges. Several solutions are in place to ensure that products and processes generate as little industrial waste as possible. **SNF is making every effort to increase energy recovery and support the transition to more sustainable methods** that avoid landfill or incineration without energy recovery. In thermal recycling, several sources of waste are used as alternative fuels in boilers. The Group is also developing a recycling policy in the product chain, in compliance with the REACH regulation. As such, it recycles certain solvents and optimizes cleaning cycles. In addition, filter presses are being installed to reduce sludge volumes.

When the economic scheme and product compatibility allows it, SNF recycles the secondary flow generated by some of these processes as raw material in other processes on the same production site. Through its partners, SNF uses the calorific value of its waste, during its thermal treatment for elimination, by recovering this energy in the form of heat or electricity.

SNF constantly monitors the conditions under which the products it markets are used and any associated dangers.

In the same way, the Group ensures that information on risks is readily available for all of its REACH products and registrations. SNF monitors the lists of substances of very high concern (SVHC) defined under REACH and used in its production processes or placed on the market. The Group is committed to reducing their use and replacing them with alternative solutions whenever possible. Environmental and health impacts are therefore formally taken into account by SNF teams from the very outset of a new product’s design, i.e. at the R&D stage.

To adopt a **preventive attitude with regard to the introduction and handling of potentially toxic or dangerous products**, the project manager must factor in their intrinsic dangers from the design stage by taking into account the physico-chemical and toxicological data. This necessarily involves reviewing the Safety Data Sheets

(SDS) of reagents before they are purchased. At that stage, as soon as a chemical product under consideration for use in a project is identified as a proven or suspected CMR (carcinogenic, mutagenic and reprotoxic) substance (category 1A or 1B, H340, H350, H360), the project manager is required to look into substitute solutions that use less hazardous products or processes. This must be done as part of a comprehensive analysis of the problem and the substitution consequences.

**If the chemical or process cannot be substituted, the project is suspended or continued with full knowledge of the facts.** In such cases, when a category 1A or 1B CMR substance is first purchased, the QHSE Coordinators and ultimately the R&D Department authorize the purchase after reviewing the arguments for non-replacement. The data collected during the overall analysis is also entered in a digital lab notebook in a structured argument explaining the failure of the substitution.

The argument must be revised or adapted for subsequent purchases of the same category 1 CMR substance if data and/or usage changes.

For hazardous chemical agents, the substitution principle may be applied preventively, especially if, following a risk assessment (quantity and frequency handled, and potential routes of exposure concerning

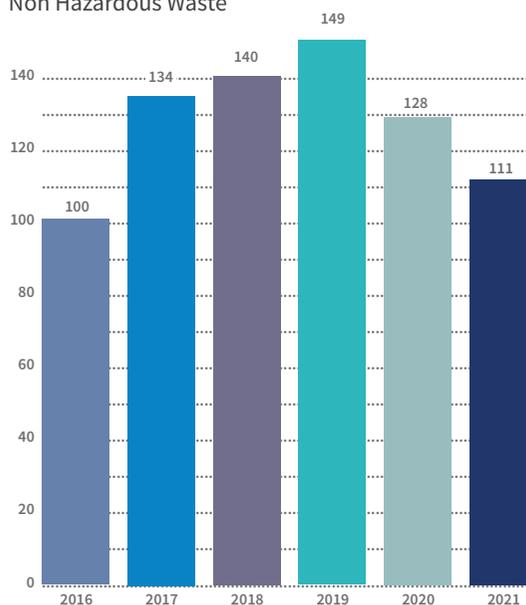
use and physico-chemical properties), collective protective equipment (CPE) and personal protective equipment (PPE) do not allow the risk to be reduced to an acceptable level. Where possible, SNF teams eliminate highly toxic chemicals or chemicals of concern or replace them with less toxic ones.

Examples include:

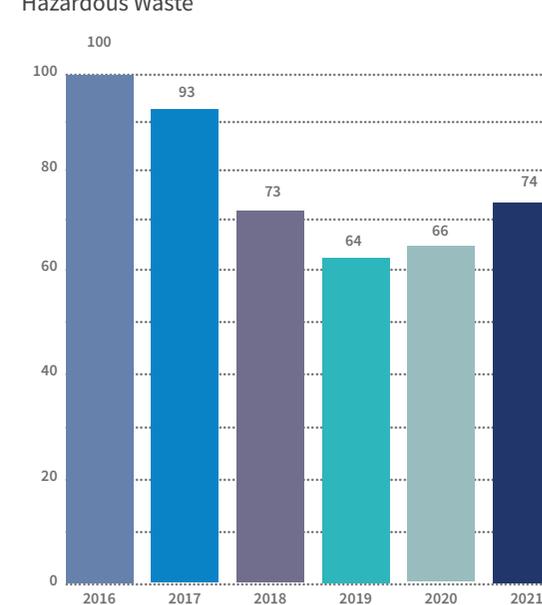
- Creation of a range of paraben-free packaging polymers for the household & industrial cleaning and cosmetics markets (PF range);
- New lubricant for the manufacture of powder with fewer VOCs by replacing mineral oil of petrochemical origin with a composition of plant origin;

- Eco -friendly polymers for the household & industrial cleaning and cosmetics markets;
- Phosphorus-free scale inhibitor for detergents to combat eutrophication;
- PDADMAC coagulants technology was transposed using a low energy consuming process without compromising the performances;
- Inverse emulsions using biobased oils and surfactants such as NATURSOL™ in personal care are being implemented to other applications;
- Inverse emulsions active content enhancement to decrease the CO2 emissions linked to transportation;
- Polymers that help increasing the recycled fibres ratio in paper and pulp industry.

Non Hazardous Waste



Hazardous Waste





#### 5.2.4 OTHER EMISSIONS

**SNF exercises great vigilance regarding the annoyance caused by its operations to local residents living near all of its industrial sites.**

Each year, the Group makes adjustments to take these issues into account. Achievements include the modifying treatment plants to reduce sulphur dioxide emissions (odors), installing activated carbon treatment, installing silencers on air compressors and chillers, purchasing of cooling towers with reduced noise emissions and the choice of closed structures for production activities (noise). Noise measurement campaigns are carried out regularly. For instance, SNF has undertaken extensive work at Andrézieux plant (France) in 2021 to reduce noise. The cooling tower technologies have been replaced by systems

with a more reliable noise emission. In addition, the drying air outlets of the powder processes have been equipped with silencers.

### 5.3 SUSTAINABLE USE OF RESOURCES



The exploitation of natural resources and their availability over the long term are fundamental challenges for human development and the sustainability of SNF's activities. Controlling consumption and finding new solutions, both of which are inseparable from ecological and economic responsibility in the face of global challenges, are objectives shared by all of the Group's sites.

**A common thread: less is more.** The secret to gradually reducing the environmental impact of SNF's industrial sites is to optimize consumption. It also involves innovation and the investment that goes with it.

From the design stage of manufacturing units, environmental considerations are factored into the choice of processes and equipment. The use of renewable raw materials and energy, in keeping with the circular economy principles, is another feature.

#### 5.3.1 CONSUMPTION OF RAW MATERIALS

Population growth, rising living standards and the intensification of industrial production add up to overconsumption of resources. Raw material consumption has more than tripled since 1970 and could double again by 2050.

**SNF constantly assesses its product portfolio to turn its offering towards sustainable solutions.** Its approach is aligned with the United Nations Sustainable Development Goals. It covers the entire value chain, from raw materials and manufacturing processes to product end of life.

Solutions are classified by contribution so that action can be focused on enhancing sales portfolio sustainability. This analysis enables the Group to identify opportunities to make better use of its products and develop better production, use, recycling and reuse. The objectives are to operate using minimum raw materials, facilitate reuse and extension of product life and use biodegradability and mechanical or chemical recycling wherever possible. SNF is modifying its manufacturing processes to reduce the use of non-renewable raw materials wherever possible. Materials and energy used must be renewable rather than exhaustible.

In 2021 SNF has started an ISCC+, International Sustainability and Carbon Certification process. The



Andrézieux-Bouthéon (France) pilot site is now ISCC+ certified to use a certain amount of bio-based raw materials. Early 2022, SNF started the process to certify

its second manufacturing site in Saint Avold, France, for cationic based polymers. This next site certification will ensure that both cationic and anionic polymers can receive the sustainability certification. Thus covering a large scope of SNF applications. The Group has already contacted several suppliers to obtain quantities of recycled raw materials to integrate into its processes and finished products. Moreover, ISCC+ certification will allow SNF to participate in the circular economy by sourcing raw materials obtained from recycled waste. The aim is to offer to SNF's customers sustainable end products at different percentages and thus be in a virtuous circle. This will allow the Group to significantly reduce the carbon footprint of its products. Bio sourced or renewable raw materials have already averaged between 5% and 7% of our purchases in France over the last four years, reflecting the fact that they are becoming available in large quantities.

R&D projects are being conducted to **develop more environmentally-friendly polymers using renewable raw materials and to increase the overall biodegradability** of our commercial polymers.

This work is further backed up by the expertise of our subsidiary HTS bio, which specializes in designing ecological solutions using a range of biotechnology processes. Our advances in biocatalysis to produce acrylamide using a copper-free process with a low enzyme dose rate are one example. Another example is our recent patent on bio-based iso-butylene as a raw material for making one of our main monomers. We also collaborate with various companies on industrial routes towards bio-acrylic acid and bio-acrylonitrile.

At the same time, the Group is developing several solutions to promote the recycling of its products and those of its customers. Our main raw materials are low-molecular-weight unsaturated carbonyl compounds known as monomers. They are inherently reactive, as polymerization essentially involves the reactivity of monomers with each other. They are therefore regulated and used in large volumes, being central to our know-how as a manufacturer of water-soluble polymers:

- Acrylamide
- Acrylonitrile
- Acrylic acid
- Dimethylaminoethyl (Meth)acrylate
- Acrylamido tertiary butyl sulfonic acid
- Methyl (Meth)acrylate

At the end of the process, our polymers are mainly found in treated sludge or the recovery of the relevant product (applications for mines) and are destroyed by

steps involving chemical or thermal treatment. As our polymers are used in very small quantities (less than 1% in most cases and as little as 0.0001% in water cleaning), they cannot be recycled in most cases, except enhanced oil recovery (EOR) applications where the co-produced water is fed back into the process. Since 2002, we have constantly been seeking to improve our understanding of what happens to polymers and how they behave when released into the environment. As part of this process, SNF has funded research studies showing that our polymers are not toxic. Our products degrade within five years, without leaching into the soil or being absorbed into vegetation. SNF also studies what happens when polymers contained in water are discharged into the sea and how polymers react with marine species. The Group has funded numerous studies to understand this interaction. These studies have demonstrated the harmlessness of our products.

### 5.3.2 WATER CONSUMPTION

**Today, it takes 20% less water to produce one tonne of finished products than it did 10 years ago.**

Most SNF chemicals are water-soluble and are ultimately used to modify the properties of the water used by our customers through flocculation, friction reduction or viscosity modification. Water has many beneficial effects throughout the process right up to the customer. Our customers use water to solubilize

our products, so the water supplied with our products is separated from their use and returned to the water cycle of the relevant application: purified water, drinking water, petroleum water, irrigation water, water for cosmetics, textiles, detergent and water for paper. It is therefore a valuable and preserved resource when present in our products.

Water is also necessary in our manufacturing processes and utilities: in fact, water is used in SNF's industrial activity as a reaction medium and for cooling, heating and equipment washing. We are constantly conducting studies to optimize this area of our water consumption. Water is also useful as a vector to bring our technological solutions to our customers in liquid form. Lastly, water can be found in the form of residual moisture for the so-called distilled or dry forms of our chemicals.

Water is a preferred solvent for our processes and vectorizes our technologies, because no other solvent has the equivalent availability and harmlessness for humans and the environment.

On average, water accounts for approximately 70% of our manufacturing formulas, which at the end of the manufacturing process contain on average around 30% water as a solvent, the ideal chemical solvent for our customers.

One tonne of active polymer sold by SNF requires one

and a half tonnes of water to manufacture and will be delivered to our customers with an average 800 kg of water.

More specifically, emulsion formulations contain 40% water, while powder formulations contain 68-78% water. Polymer solutions are sold on average with 20-25% water, although some grades include 94% water. Finished products such as those sold associated with emulsion technologies can contain 5-60% water and an average of 40%, whereas powders only have around 10%.

As a result, while water requirements to produce a tonne of finished products are 20% lower than they were 10 years ago, the reduction in water consumption associated with industrial use stands at nearly 40%, as water used in formulas and as a vector is a responsible choice of solvent that cannot be taken into account in our ambition to reduce our footprint in terms of water resources. The objective of reducing our water intensity by 20% by 2030 implicitly excludes this volume.

Applied at all the relevant sites, the Group's water management policy aims to control and reduce the withdrawal and consumption of fresh water and to maintain the quality of water bodies into which effluents are discharged (see 5.2.2. "Effluents").

SNF has modified its production practices to reduce water consumption, developing closed networks using reclaimed water. In particular, the washing of reaction vessels has been optimized by further recycling water and creating new washing methods. The use of washing nozzles reduces water consumption by 75% for this application.

In 2021, SNF has identified only one site in water stress zone, out of its 21 manufacturing facilities, as defined on the basis of Aqueduct 3.0. This plant, in Gandhidham (India), is reusing nearly 4,000 KL/month in its industrial water requirement with help of Zero Liquid Discharge (ZLD) Unit and 230 KL/month in its plantation and gardening water requirement using a Sewage Treatment (STP) Unit.

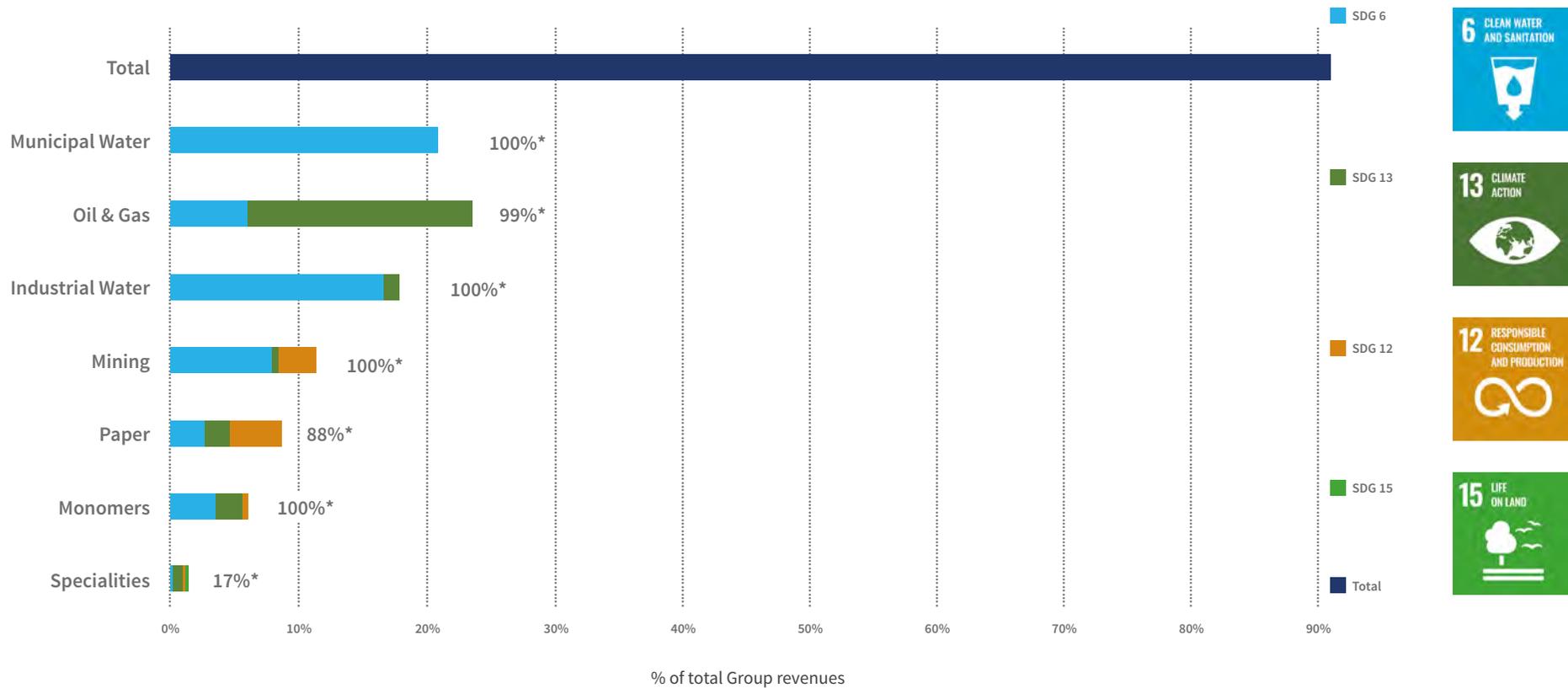
SNF also constantly monitors consumption, installing flow meters, detecting leaks, improving fire circuits, collecting rainwater and recycling water from boiler washing or condensation. This policy is reinforced by recycling water from boiler washes or condensates.



In addition, SNF's portfolio of innovative solutions helps its customers operate responsibly and sustainably.

**The Group markets products that positively impact ecosystems. All products contribute either to treating, recycling, or preserving water, or to saving energy and reducing carbon footprint. 91% of SNF's revenues meet the UN SDGs.**

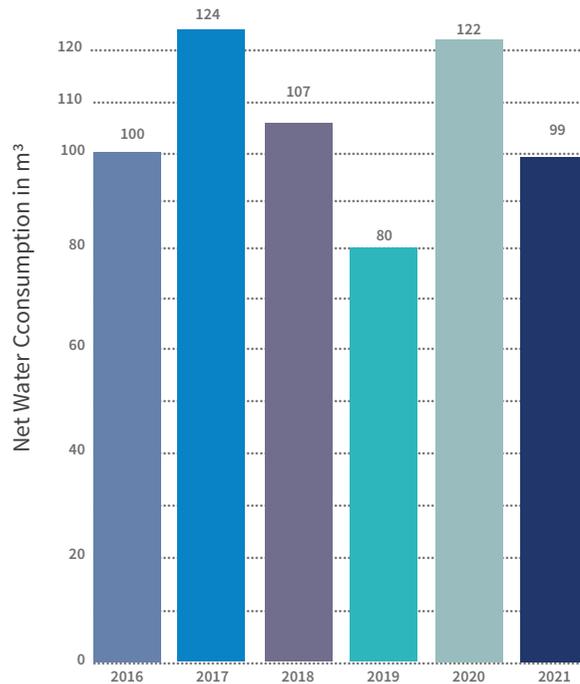
Contributions of SNF Revenues to the UN Sustainable Development Goals



Source: Company

\* Share of revenues contributing to the UN SDGs within each market

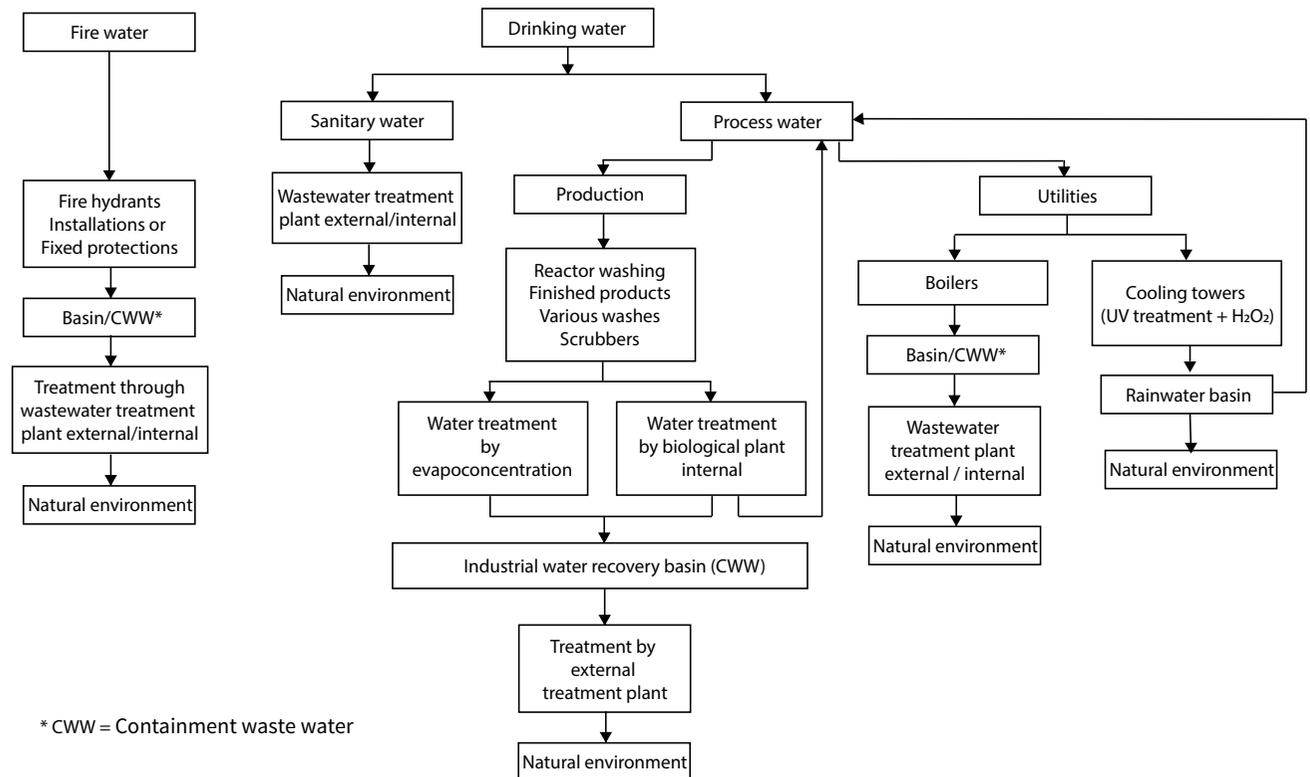
SNF's products have many industrial and commercial uses. They are used in all areas where water is present: wastewater treatment, drinking water production, sludge dewatering, mining, oil and gas extraction, agriculture, paper, textile and cosmetics manufacturing, construction and public works, equipment and engineering, and industrial and household cleaning. Used as flocculants, they facilitate the separation of suspended solids in water; as viscosity modifiers and friction reducers, they modify the density of liquids and aqueous fluids in motion.



SNF is carrying out R&D work to recycle cooling tower blowdown in processes that allow it. Similar work is underway to recycle effluent from biological plants for reuse in processes.

These initiatives have a dual purpose, to reduce fresh water consumption and to reduce water discharges. The new cooling tower standards implemented by the SNF Group on production capacity increases are based on technology that reduces water consumption by 90% compared to previous technologies.

### Water Cycle of a Typical SNF Plant



**5.3.3 ENERGY CONSUMPTION**



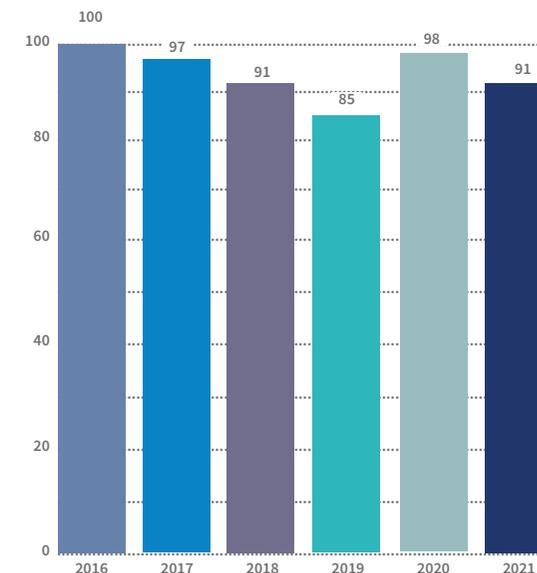
SNF's energy consumption results mainly from its industrial operations. Three primary energy sources are used: gas used at the powder producing facilities and for steam production for 64%, electricity for the driving force of machines for 32% and the rest in steam for the process needs. In China and in South Korea, we use a steam network in addition to the production from natural gas. The priorities implemented in terms of energy efficiency are the subject of a constant search to optimize consumption and costs. They are concerned with the design and purchase of equipment and day-to-day plant operation. **SNF relies on a worldwide network of leaders in the energy sector at the level of (i) its operations and plants, and (ii) the purchasing and technical entities concerned.** The Group emphasizes on medium and long-term partnerships and contracts to ensure secure and competitive supply, . Periodic monitoring of price trends also makes it possible to anticipate readjustments.

In France, the choice of EDF's Renewable Energy option, with the guarantee-of-origin mechanism, means that 10% of SNF's electricity purchases come from renewable energy sources and thus reflect its commitment to the environment. The guarantee-of-origin mechanism managed by Powernext, an independent body, ensures that a corresponding quantity of electricity of renewable origin is injected into the electricity grid. In India, SNF has signed a Purchasing Power Electricity Agreement of hybrid renewal power which will help to reduce its plant's 2022 carbon emission in Gandhidham. SNF will achieve CO<sub>2</sub> reduction from April 2022 of estimated 2.57 Kilotons each year. In China, SNF has signed new power supply agreements. They will allow the Rudong site to be powered by 80% of green electricity while the Taixing plant will be powered by 15%. In USA, SNF has subscribed 2 Mega watts of solar power beginning for 2022. The group has installed solar panels on its facilities in Italy, thus benefiting from decarbonized electricity.

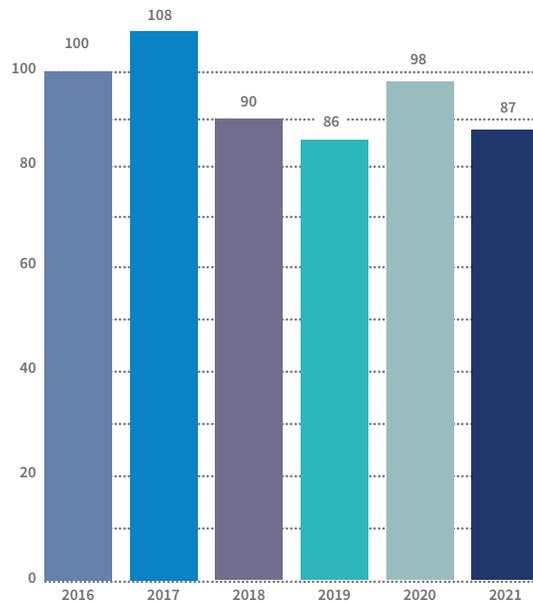


At the operational level, the Group's energy management system makes it possible to render virtuous practices systematic in line with each site's specific features and objectives. It is based on periodic reviews of the conditions governing the sites' assets and energy connections. In addition, data collection and analysis systems are in place in the manufacturing processes and facilities for the entire operation. They manage part of the operating parameters of facilities. This control of the machine fleet avoids any consequent energy loss in the event of failure, mainly when replacement requires a complete shutdown of the plant. They also help consolidate the Group's outcomes.

Natural gas consumption



Electricity consumption



The Company identifies and assesses possible ways of reducing its energy consumption. SNF also carries out energy audits and implements programs to optimize energy consumption. For example, pilot tests of energy recovery on the powder production workshops at our pilot site in Andrézieux-Bouthéon (France) were conducted from February 2020 to December 2021, mobilizing a budget of € 1.4 million s and a full-time equivalent engineer. Although these tests were not conclusive enough to be generalized, the group will continue to invest in pilot testing. On top of the energy aspects of this programme, the Group aims to strengthen the competitiveness of its manufacturing sites with the savings achieved.

installations, accident monitoring, and experience sharing.

In the event of probable contamination, investigations are carried out to characterize the areas concerned and contain their impact. Appropriate management measures are then drawn up in cooperation with the local authorities.

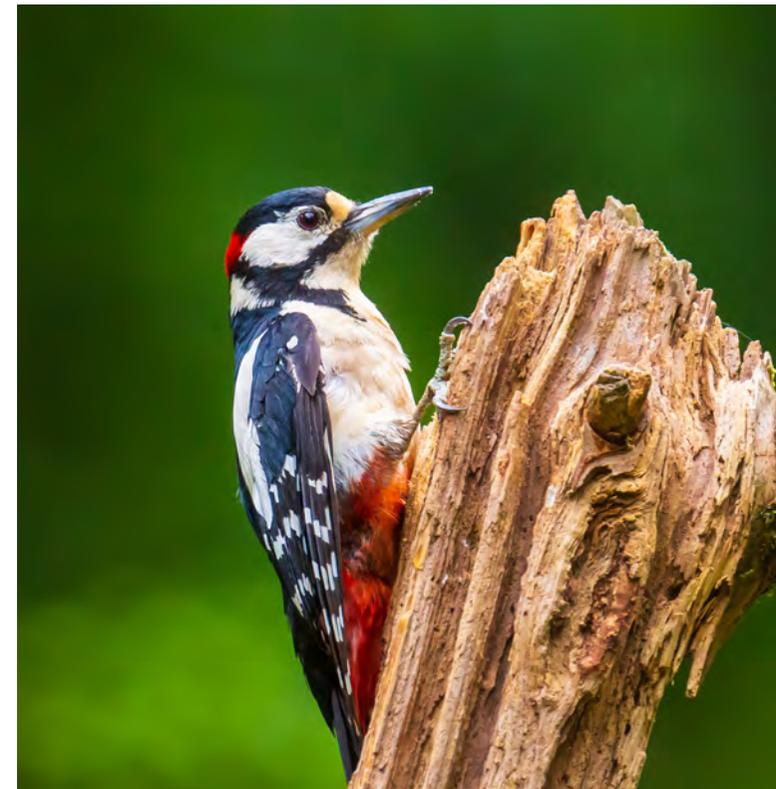
**5.3.4 PROTECTION OF INDUSTRIAL SITES**



In keeping with its commitment to preserving wildlife, SNF has a policy of reducing the impact and health risks associated with its operations on the soil and subsoil. Periodic environmental analysis of the various sites enables us to identify the effects of our operations on the environment and any species concerned. On this basis, action plans are drawn up and progress is tracked in compliance with applicable regulations.

**SNF strives to limit its impact on soil by optimizing industrial surfaces to preserve agricultural, urban, and forest areas.**

For operating sites, the Group pursues a prevention policy based on programmes for the mechanical integrity of



**5.4 OTHER INITIATIVES IN FAVOUR OF BIODIVERSITY**

Besides its operations, SNF also addresses broader biodiversity challenges in a determined fashion. To encourage revegetation and the development of local species, SNF contributes to the development of biodiversity on land not occupied by its industrial activities.

**The Group is determined to locate its industrial sites in rural areas or on brownfield sites, integrating from the outset the challenges of preserving and developing existing biodiversity.**

Several pilot sites are also involved in a number of biodiversity initiatives. Thus, available land around the buildings is systematically subject to ecological development research in cooperation with local partners. In France, the extension of the Andrézieux-Bouthéon site (Auvergne-Rhône-Alpes) gave rise to major compensatory measures, including a 50-year lease on a 100 hectare plot. This area is managed for the protection of fauna and flora by the Conservatoire d'espaces naturels Rhône-Alpes (CNRA) at a cost of €1.2 million borne by the Group. For the site

of Bois de la Pécelière in Saint-Héand (Auvergne-Rhône-Alpes), SNF asked CESAME, an environmental consulting firm, to conduct an ecological monitoring report published in 2021. The floristic follow-up was carried out by a botanist, the monitoring of the avifauna by an ornithologist while sessions were planned for the amphibians and dragonflies, for the listening-recording of bats and to list saproxylic beetles observed. Terrestrial mammals were also sought. Although not protected, these species are indicative of good biodiversity.



In the North of France, where SNF's new plant is under construction in Dunkirk, we financed in 2021 the planting of 500 trees, a natural solution to capturing CO2, creating reserves and biodiversity.

In India, the Flopam site encourages all employees to

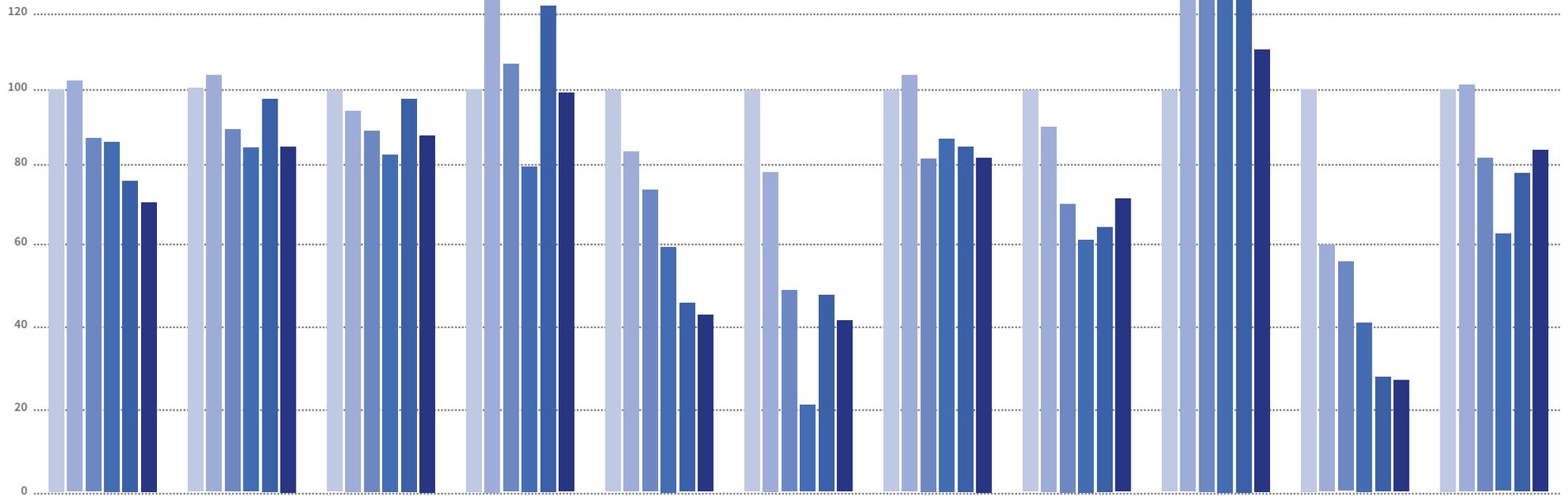


plant or replant numerous plant species on parts of its available green spaces, subsequently making them responsible for their proper upkeep. 2,700 plantings of heritage and local species were accordingly carried out.

In Riceboro, U.S.A, plants are continuously maintained. In 2021, SNF purchased nearly 520 acres of timberland near Riceboro which will be maintained in its current state until SNF needs this land for future growth.



**5.5 RATIO PER REVENUES (100 = 2016)**



	CO2 Emissions Scope 1 +2	Electricity consumption	Natural gas consumption	Net water consumption	COD for released water	Suspended solids in released water	Nitrogen for released water	Hazardous waste	Non Hazardous waste	VOC (Volatil Organic Compounds)	Dust emissions
Change 2016 vs 2016	100	100	100	100	100	100	100	100	100	100	100
Change 2017 vs 2016	102	108	97	124	86	79	107	93	134	60	103
Change 2018 vs 2016	89	90	91	107	75	51	84	73	140	57	84
Change 2019 vs 2016	87	86	85	80	61	22	89	64	149	41	64
Change 2020 vs 2016	78	98	98	122	47	46	86	66	128	31	79
2021 vs 2016	75	87	91	99	45	41	82	74	111	28	85

**5.6 GROSS READINGS OF THE MAIN ENVIRONMENTAL INDICATORS**

	UNITS	2016	2017	2018	2019	2020	2021
CO <sub>2</sub> emissions (Scope 1)	t	215,597	232,881	253,892	257,600	258,898	317,781
CO <sub>2</sub> emissions (Scope 2)	t	271,073	354,763	376,224	425,521	281,872	315,397
CO <sub>2</sub> emissions (Scope 1 & 2)	t	486,670	587,644	630,116	683,122	540,770	633,178
Electricity consumption	MWh	499,437	636,896	650,155	689,727	700,875	752,763
Gas consumption	MWh	966,574	1,108,237	1,279,238	1,317,165	1,357,804	1,523,764
Water consumption	m <sup>3</sup>	3,194,552	4,159,523	4,725,736	4,645,811	5,026,169	5,560,424
Vector water volume	m <sup>3</sup>	1,242,179	1,570,652	1,809,328	1,907,180	1,697,512	2,005,659
Volume of released water	m <sup>3</sup>	724,960	784,667	1,019,993	1,166,626	1,185,514	1,460,551
Net Water Consumption	m <sup>3</sup>	1,227,413	1,804,204	1,896,415	1,572,005	2,143,143	2,094,214
COD of released water	kg	122,406	124,270	132,887	120,253	82,919	94,353
BOD of releases water	kg					7,423	6,633
Suspended solids in released water	kg	44,625	41,920	33,006	15,834	29,404	31,907
Nitrogen content of released water	kg	6,320	8,000	7,721	9,045	7,722	9,002
Hazardous waste	t	11,720	12,828	12,372	12,035	10,985	15,046
Non-hazardous waste	t	26,527	42,095	53,768	63,516	48,407	51,157
Waste recovered as energy	t	11,064	12,737	12,037	10,957	15,899	18,264
Other recovered waste	t	3,201	3,138	3,064	3,451	3,756	4,173
VOC emissions	t	372	266	305	244	164	179
Dust	t	55	67	67	57	62	81



## 6.1 CORPORATE SOCIAL RESPONSIBILITY POLICY



Most of SNF's production is integrated, in keeping with its strategy of preserving expertise and know-how and securing supplies.

However, the Group's ability to grow also hinges on the retention and development of its suppliers and subcontractors, whose successes, expertise, and know-how contribute to SNF's own. Their social and environmental practices must be incontestable.

As such, the fight against corruption underpins an ethical approach to which the Group is deeply committed. It implies a unwavering commitment to carefully comply with the laws and regulations applicable in all countries where SNF operates. This commitment extends to all of the Group's internal ethics and compliance policies and procedures. Lastly, aware of its responsibility to promote the development of local communities, the Group creates local jobs and acts as a corporate citizen wherever it operates. It seeks to blend harmoniously into the local

economic fabric, and be a responsible actor committed to the lives of the communities with which it creates and maintains bonds. The Group acts in keeping with its long-term commitment through local economic, social, and cultural initiatives. It also cultivates close ties with the world of education.

## 6.2 PURCHASES FROM SUPPLIERS AND SUBCONTRACTORS

SNF's activities call on suppliers and subcontractors to manufacture certain finished products or for maintenance operations.

In its purchasing policy, the Group seeks to take social, environmental and societal issues into account to build long-term, balanced, sustainable, and trust-based relationships with its partners. These relationships must be developed transparently and in compliance with the contractual terms negotiated, including those relating to intellectual property.

### **SNF's Responsible Purchasing Policy is guided by the ethical principles of its Code of Conduct.**

These principles cover human and labour rights, respect for the environment, quality and safety of products and services, and compliance and ethics. In keeping with the principles of business integrity and transparency, suppliers must comply with the principles of competition law, the prevention of corruption and conflicts of interest, and confidentiality, transparency and truthfulness of the information provided. In strict adherence to these principles and to meet our continuous improvement approach, SNF requires its suppliers and subcontractors to respect, along with their suppliers, at least the principles of the Global Compact and the OECD (Organization for Economic Cooperation and Development), together with SNF's Responsible Purchasing Charter.





Failure to comply with the provisions of this Charter may result in reconsideration or termination of the business relationship, and corrective actions will be implemented per the terms of the relevant Purchase agreements. An email system has been set up

with our Ethics Officer to report to SNF any violation of regulations.



Assisted by EcoVadis, SNF also uses a procedure for assessing environmental, social, ethical and supply-chain risks.

This procedure helps foster societal responsibility throughout the service chain in accordance with the principles of the United Nations Global Compact and Responsible Care<sup>®</sup>. Meanwhile, purchasing department employees are trained in the Supplier Code of Conduct and EcoVadis’s CSR assessment process. SNF carries out risk mapping for its customers and suppliers, looking at both country and business risks.

A corruption module has supplemented this work to identify the risks associated with the Group’s business. In 2021, **SNF selected 20 main suppliers to be assessed by EcoVadis in Europe, Asia, and United-States**. The results of these assessments were highly positive: all suppliers responded to the survey and the average score was 64, corresponding to the EcoVadis Gold level, whereas the average for the sector as a whole is 45.

Over the past two years, around 40 suppliers and customers have been evaluated by Ecovadis and we plan to assess at least 20 other suppliers in 2022. The Group’s leading suppliers are very sensitive to CSR issues and have firm commitments. Therefore, SNF plans in 2022 to contact its leading suppliers to collect data about scope 3 and emission factor for raw material.

### 6.3 COMPLIANCE AND ETHICS

The Group operates in accordance with the principles and rules of compliance and ethics. It ensures compliance with international agreements and the laws applicable in its host countries, and commercial integrity. In France, it uses a warning and alert system that meets the requirements of the law on the duty

of care and the Sapin II law on transparency, anti-corruption, and the modernization of the economy. SNF is also committed to complying with the rules of free competition and to preventing and proscribing corruption and fraud, both internally and in business transactions with partners.

SNF develops and maintains a culture of compliance to conduct its operations ethically and refrain from business arrangements aimed at eliminating or distorting the competition. This requires strict adherence to all competition laws.

#### 6.3.1 CODE OF CONDUCT AND ETHICS



The Code of Business Conduct and Ethics, including the Anti-Corruption Charter, sets out the good business practices that employees and third parties apply. No employee shall directly or indirectly offer, provide or accept any undue advantage, whether monetary or of any other nature, designed to facilitate or obtain a business relationship, with persons holding public authority, business intermediaries,

customers' employees, or political parties. All employees must comply with the regulations on the importation and exportation of goods and services. Lastly, all employees must carefully comply with the competition law rules in all Group countries. The Code and Charter are given to all employees.

In the field of human rights policy, SNF acts with vigilance to avoid any interference in the conduct of its business and its relationships with third parties. The Group ensures compliance with key international standards and frameworks: the International Bill of Human Rights, the International Labour Organization (ILO) Conventions, the Organization for Economic Co-Operation and Development (OECD) Guidelines for Multinational Enterprises, the Ten Principles of the United Nations Global Pact, and the Responsible Care' programme.

### 6.3.2 ANTI-COMPETITIVE PRACTICES, CORRUPTION AND FRAUD

SNF has implemented a competition compliance program that adopts an uncompromising approach to breaches of competition law. Awareness training and support is organized to ensure that the buyers and employees most exposed to risk understand and apply the additional procedures on a daily basis in

their contacts with competitors, when exchanging information, and with their respective partners.

Awareness-raising is also carried out within the Group in order to maintain or improve the level. Employees are encouraged to report any breaches of conduct or irregular situations to Management, Human Resources or the Legal department. A dedicated whistle blowing system has also been set up to allow employees to submit questions, concerns, or reports of suspect behaviour via a central email address managed by the SNF Compliance Officer, who is responsible for managing and supervising the application of the Code of Conduct. SNF had also distributed a policy on Interest Representatives-Lobbying-Advocacy. SNF Chairman and CEO annually reviews our trade and business group memberships to ensure they are aligned with our interests. The SNF Board of Directors is regularly informed of the activities of these organizations and discusses the position SNF wishes to take concerning the various issues under consideration. Therefore, our communications to these organizations should accurately reflect the views of the SNF Board of Directors. Lastly, pursuant to French Law No. 2016-1691 of 9 December 2016 on transparency, anti-corruption, and the modernization of the economy, the Group commissioned EcoVadis

to establish a risk map. The results made it possible to formalize an efficient procedure for assessing the situation of clients, suppliers, and intermediaries.

## 6.4 PHILANTHROPIC COMPANY

SNF seeks to link its philanthropic actions to its areas of expertise and supports causes wherever its products or activities can add value. The Group dedicates its funding to the promotion of science and education, and the local life of its host communities. In certain circumstances, it also supports humanitarian initiatives.

### 6.4.1 LOCAL PRESENCE AND DEVELOPMENT

A responsible economic player, the Group contributes to the societal development of its host communities. Its various sites, it creates direct and indirect jobs, preferring to hire locally. It develops local skills and know-how, makes purchases, and pays the applicable taxes. The location of the Group's activities is based exclusively on operational choices. Tax aspects do not impact the decision-making process.

The Group also supports its infrastructure and techniques to innovative start-ups near its facilities and contributes to specific industrial sectors

upstream. This policy helps the Group put down roots in its local communities. In 2021, SNF contributed to value creation in all of its host communities, notably through the direct employment of the 933 people who joined the Group during the year.

The Group places people at the heart of its business and its day-to-day operations. In addition to initiatives related to its activities, it plays a complementary role as a corporate citizen wherever it operates, by developing harmonious and constructive relationships with stakeholders.

In June 2021, the construction site of a new SNF plant in Dunkirk, North of France, was officially launched. The French government, the Hauts-de-France Region and the Dunkirk Urban Community strongly supported the project.

By choosing the Dunkirk chemical and industrial port platform in the municipality of Gravelines, the group has decided to make an initial investment of €70 million, in the first instance.

It could rise to €160 million with the creation of new workshops that should lead to the creation of 160 direct jobs in the long term.



**This new activity in Dunkirk will significantly impact on maritime export traffic for the Port and will generate significant subcontracting orders for all the industrial services companies in the region.**

In 2021, SNF invested also in Auvergne Rhône-Alpes regional development fund to help local business. Lastly, the Group participates in various funding schemes for integrated developments that enhance the environment, quality of life and friendliness.

#### 6.4.2 CORPORATE CITIZENSHIP AND SOLIDARITY

On top of the economic contribution and strict adherence to the regulatory framework, SNF maintains close ties with all of its stakeholders. The Group uses local communication to build trust and quality relationships with its immediate environment, throughout the world. This approach allows the expectations of the local population to be understood and better integrated into the Group's strategy. It is expressed initiatives aimed at residents, businesses, individuals, authorities, and local elected officials. The aim is to improve the image of the chemical industry, contribute to the acceptance of chemical plants in society, and raise awareness about the Group's activities.

As such, SNF is particularly attentive to local residents' expectations and concerns and endeavours to provide the best possible response to any concerns they may have about industrial or chemical risks. The Group promotes dialogue and information on its activities, products and manufacturing processes. Site news and projects are also regularly shared with the broader community. The various sites periodically open their doors to the public to explain chemistry's solutions to everyday life. To help protect employees and residents, SNF addresses risks by simulating incidents or accidents in partnership with local health and safety services (see 4.3.1. "Health and safety policy"). The Group's values of solidarity and responsibility are extended to several local charities and fundraising events.

The desire to help those most in need and play an active role in the local community is reflected in many direct contribution initiatives.



**In India, SNF carries out support initiatives in various communities,** including donations of equipment and school materials or partnerships for local events and celebrations. In 2021, the Group provided 200 food support kits to assist families in Varsana, Padana and Anjar Taluka villages during the Covid-19 period, while 300 geometry kits were given to Varsana primary school pupils.

The American sites support national cancer research **in the United States via the Relay for Life® initiative. The Community Outreach program** helps improve the quality of life in

communities near the Group's plants. In the United States, SNF also contributes to community events such as youth sports programmes and historical legacy celebrations such as the African-American civil rights movement.

In China, SNF supported the local community program to help Chinese families with serious illness and difficulties in Taixing Economic Development Zone and actively participated in local programs to help Shanxi province poverty alleviation cooperation activities.



In France, SNF supports the Telethon, a charity event organized since 1987 by the French Muscular Dystrophy Association (AFM) to fund research projects on genetic neuromuscular diseases. The Group also made donations to the Sauveteurs de Chasse sur Rhône, and sponsored the ABH FOOT soccer club, the

EBO children's basketball team, the French Federation of Adapted Sports for young people and adults with motor disabilities, gathering the inhabitants of the communes close to our SNF's plant in Andrézieux. The Group also carries out meaningful work in its host regions, such as creating 12 wells in Kenya in the Taveta region.

### 6.4.3 INVOLVEMENT IN THE WORLD OF EDUCATION

Wherever it operates, **the Group seeks to forge links with the world of education.** It maintains an ongoing relationship with the scientific and educational ecosystem. This priority takes the form of partnerships with the educational community to promote scientific knowledge and careers in the chemical industry among young people.



Similarly, SNF forges close ties between its employees and students. The Group regularly welcomes trainees under work-study contracts and international volunteer work experience contracts (VIE), and doctoral students.

This is one of the ways the Company makes itself known and presents its products to students and graduates. In addition to the various forums in which the Group participates, this long-term loyalty policy strengthens its reputation and enables it to expand its pool of potential candidates (see 4.2.1. “Recruitment policy”).

**SNF also cultivates partnerships with universities and research laboratories, fostering closer ties between academia and industry.** The Group has established funding with scientific bodies in the form of university partnerships and scholarships to make progress through the contribution of other experts.

Educational institutions supported in France include the Catholic University of Lyon, Jean-Monnet University of Saint-Étienne, Ecole la Mache in Lyon, and engineering schools CPE Lyon and Sigma Clermont-Ferrand.

In 2021, in the United States, SNF made a gift to the University of Oklahoma to conduct experimental studies using different polymer systems (including SNF products) to conduct critical research in the area of drilling and well integrity and educate and train the next generation of engineers for the energy industry. With SNF support, students will write technical papers and present them in different venues. SNF also makes presentations in schools to generate interest in science and gives professional advice to young people as part of the Riceboro summer programme and at Liberty County College and Career Academy. Presentations and plant tours are organized for the Young Adult Liberty Leadership Group members. At the same time, the Group takes part in career fairs and partners with Savannah Technical College and the Georgia Institute of Technology to improve learning. SNF recruits at four American universities: Clemson University, Georgia Institute of Technology, Georgia Southern University, and West Virginia University. The Company also supports events organized by the American Institute of Chemical Engineers (AIChE).

In China, SNF is developing partnerships with Shenyang Aluminum and Magnesium Engineering Research Institute, supporting it with new products and applications development.

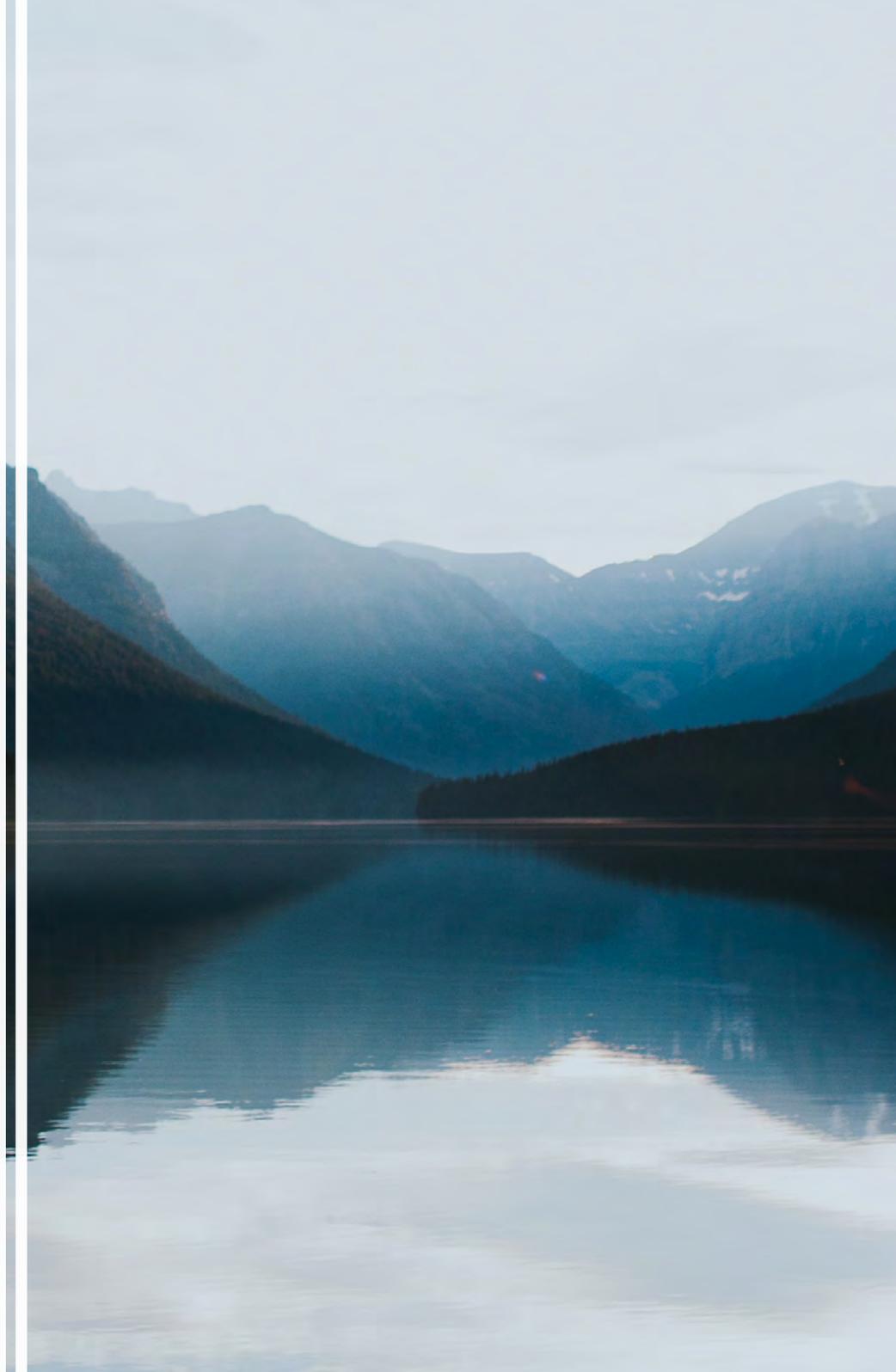
In South Korea, SNF is also developing partnerships with universities. The director of the Group’s manufacturing site in Ulsan is an assistant professor at the University of Ulsan and provides training related to the chemical industry, including practical internships within the company.





# APPENDICES

NOTE ON METHODOLOGY  
INDICATORS



## NOTE ON METHODOLOGY

The aim of this methodological note is to:

- define the indicators and their context,
- explain calculation methods,
- describe tools and checks employed.

### OVERVIEW

The implementation and monitoring of indicators by the SNF Group, in line with the challenges of its business and the regulatory requirements of Articles R. 225-105 and R. 225-105-1 of the French Commercial Code, serve to assess and monitor the impact of the Group and the outcomes of its policies.

The SNF Group has opted to report ratios on a consolidated basis rather than by region.

To calculate them, the Group uses the regulatory definition in force in each of the countries where the data are collected.

The Group considers that trends in the ratios, currently reported on a consolidated basis, give a true picture of the actual trends in indicators at Group level.

Given that the weighting between our plants in the United States, France and other countries varied

only slightly over the period, a slight discrepancy in the definition from one region to another would not call into question the trend in any of the ratios over the same period, especially since most of them are reported in reference to a base of 100.

SNF Group has chosen a reporting system using Tennaxia software to ensure rigorous and reliable data collection. This enables all Group subsidiaries to record their data directly in accordance with the requested definitions, with the possibility of adding explanatory documents if necessary. Authorized persons at the head office then validate the results.

## INDICATORS

All indicators given in tons are metric tons.

### WATER SECTION

#### WATER CONSUMPTION

This is water consumption expressed in various units (m<sup>3</sup>, L, gal, or ft<sup>3</sup>) for each site (process + laboratory + administrative). It is converted into cubic metres in the software. The quantity of water considered is drinking water from the municipal mains supply and water drawn from the natural environment (boreholes or

other).

In the event of a meter malfunction or failure, an estimate is made based on a ratio between previous use and production, or on a material balance.

France and China: readings are taken by the water supplier and are shown on invoices.

United States: readings are taken by the water supplier and indicated on utility bills or measured by SNF (e.g. well water).

#### INDUSTRIAL RELEASED WATER DISCHARGES

This is the amount of industrial released water discharged (water from boilers, cooling towers, washing towers, etc., i.e. all water other than rainwater) expressed in various units (m<sup>3</sup>, l, gal or ft<sup>3</sup>). It is measured by meter reading (wastewater treatment plant or natural environment) and converted into cubic meters in the software. This water returns to the natural environment after treatment.

France: discharges are measured before being sent to the municipal wastewater treatment plant. In the event of meter malfunction or failure, an estimate is

made based on retention basin volumes.

USA: only measurable discharges are included. They may include rainwater which a permit under the National Pollutant Discharge Elimination System (NPDES). As there is no legal obligation to measure released water flows, Dolton, Wayne, Taylor, Los Angeles and Longview are omitted. They are treated as “satellite sites” with little or no production compared with other US sites.

For Plaquemine, we have deducted the volume of rainwater since 2020 (previous data has been updated).

China: industrial released water discharges are counted by the municipal wastewater treatment plant and appear on the invoice. Clean water discharges (cooling towers, DE water skids, and steam condensates) are not included and are discharged directly into the environment.

### NET WATER CONSUMPTION

The net water consumption represents the amount of process water consumed to operate our plants and manufacturing lines (cooling, heating, scrubbing, washing, utilities...) outside of our product

compositions. It is the total water consumption less the vector water, less the amount of released water discharged.

Vector water is the water used as a reaction medium or added to our product voluntarily to make it usable. Vector water may partially be evaporated to the natural environment or recycled during manufacturing, or becomes the final solvent of our products, that eventually returns to the water cycle of our customers' applications. As vector water is directly proportional to our sales, it is excluded to the net water consumption.

The net water consumption allows us to measure the quantity of water (in cubic meters) actually removed from the natural environment, for which we are striving to reduce our intensity.

### TREATMENT YIELD

This parameter is taken into account if the site's industrial water discharge goes to an external treatment plant. It is used to calculate the impact of pollution discharged into the natural environment for the various water parameters (COD, BOD, SS, and nitrogen).

In most cases, these parameters (COD, BOD, SS, and nitrogen) are measured on-site if industrial water is discharged directly into the natural environment.

If the external wastewater treatment yield is not available, we use the reduction rate derived from European standards (Directive 91/271/EEC). The following yields are applied: BOD 80%, COD 75%, nitrogen 75% and SS 90%.

China: we do not have data on the yields of municipal wastewater treatment plants. We apply European standards.

USA: The quantities of each parameter at the inlet to the wastewater treatment plant are unknown; therefore, the yield cannot be calculated.

France: we ask the treatment plant for the monthly yield for each parameter (COD, BOD, nitrogen, SS).

### WATER PARAMETERS (NITROGEN, SS, COD, BOD)

This is the quantity in kg released into the natural environment.

Details of the calculation:

Over a month, the average monthly concentration in mg/l is multiplied by the total volume of industrial released water discharged monthly in m<sup>3</sup> and divided by 1,000 to obtain a result in kg per month. Another calculation method involves taking the monthly average in mg/l, dividing it by 106 (mg/kg) then multiplying it by (i) the monthly flow in gal and (ii) the conversion factor of 3.785 l/gal to obtain a result in kg per month.

France: total Kjeldahl nitrogen is determined internally on a daily basis as per French standard NF EN 25663. NO<sub>2</sub> nitrites as per NF EN 26777/ISO 6777 and NO<sub>3</sub> nitrates as per NF EN ISO 13395 are measured monthly by an external laboratory. The chemical oxygen demand (COD) index is calculated daily as per ISO 15705:2002. The biological oxygen demand (BOD) index is calculated daily as per NF EN ISO 5815-1. The quantity of SS is calculated weekly as per NF EN 872.

USA: measurements are carried out on the basis of the current standard. The Plaquemine site is not included (no legal obligation). Dolton, Wayne, Taylor, Los Angeles and Longview are omitted. They are treated as “satellite sites” with little or no production compared with other US sites.

China: online monitoring is in place (daily: 3 readings for nitrogen, 6 for COD). The average is multiplied by the total quantity discharged. The parameters (nitrogen, COD and SS) are also checked manually every day.

## ENERGY CONSUMPTION SECTION

### ELECTRICITY CONSUMPTION

Electricity consumption is calculated from suppliers' invoices based on monthly consumption in MWh or kWh. No electricity is produced on-site. Consumption concerns the whole site (process and administrative). It is included in the Scope 2 calculation.

### STEAM CONSUMPTION

Steam consumption is calculated from suppliers' invoices based on monthly consumption in tonnes. Consumption is included in the Scope 2 calculation with a emission factor by country or by site if it's available. We use data from each plant for the emission factors. If no value is available, Tennaxia has an emission factor by country from ADEME..

### GAS CONSUMPTION

Gas consumption is calculated from suppliers' invoices

for the monthly consumption of each unit (MWh, m<sup>3</sup>, MMBTU, Therm\_US, Mcf, ccf). Consumption is converted into MWh in the software and is used for part of the Scope 1 calculation.

For the emission factor, we use the same for each country. We take 185 kg CO<sub>2</sub> /MWh PCS from the French regulation (of 31st of october 2012) relating to the verification and quantification of emissions declared within the framework of the greenhouse gas emission trading system.

France and USA and Taixing: the quantity of natural gas purchased is taken into account for the entire site (process and administrative).

China: total consumption data is based on supplier figures recorded on monthly invoices (two suppliers).

## WASTE SECTION

For the two indicators below, waste is separated by treatment type:

- Incineration with energy recovery
- Incineration without energy recovery
- Recycling of inorganic materials
- Metal recycling
- Biological recycling

- Landfill
- Other

If a breakdown is not available, aggregate amounts of non-hazardous and hazardous waste may be provided.

### HAZARDOUS AND NON-HAZARDOUS WASTE

This is the amount of hazardous and non-hazardous waste treated off-site at specialized treatment centers. If there are no monthly readings, it is possible to enter the data into the software quarterly in March, June, September, and December, adding together three months each time.

If the breakdown is available by source of waste, a calculation gives the share of waste recycled for energy recovery and other waste recycled.

France: this is the monthly amount of waste recorded in our waste management software. Hazardous waste is defined by Article R. 541-8 of the French Environmental Code. It is indicated by an asterisk in the list of waste types in Article R. 541-7. The classification into recovery categories is based on Annexes II-A and II-B of Council Directive 75/442/EEC of 15 July 1975, to which Article R.541-7 of the

French Environmental Code refers. Recovered waste is recorded in our waste management software. Treatment centres apply one code per treatment (R: recovery, D: disposal). The code is indicated on the waste slip when treatment has taken place.

USA: hazardous waste is reported as per US EPA 40 CFR 260-262 every year or every two years. There is no federal obligation to report non-hazardous waste. The data provided for verification purposes does not include plant waste (i.e. rubbish), scrap metal or general waste (batteries, light bulbs, etc.). Waste from pilot plants is not included. Energy recovery from waste includes waste sent off-site for incineration with energy recovery and mixed fuels with energy recovery. Other recovered waste is waste from which resources are derived (such as solvent recycling).

## ATMOSPHERIC EMISSIONS SECTION

### CFC/HCFC EMISSIONS SECTION

#### CFC/HCFC EMISSIONS

This is the quantity of CFCs/HCFCs released into the atmosphere in kg. The calculation is made by counting

the quantities of fluid refills in our equipment and not the total gas capacity on-site. These fluid refills correspond to gas leaks discharged into the air. The quantity is included in Scope 1.

### SCOPE 1 & 2

Consumption of gas, electricity, steam and CFC. HCFC emissions are used for the Scope 1 & 2 calculation.

#### SCOPE 1:

For gas, we use the same emission factor for each country. We take the value of 185 kg CO<sub>2</sub> /MWh HCV of the French regulation (of 31 October 2012) on the verification and quantification of emissions reported under the greenhouse gas emission trading scheme. All CFCs/HCFCs are converted to CO<sub>2</sub> with their global warming potential (GWP).

#### SCOPE 2:

An emission factor per country or per site is used for electricity, if available. If no value is available, Tennaxia applies a country emission factor defined by ADEME. For steam, we use the conversion factor provided by the supplier.

**VOC EMISSIONS SECTION**

**VOLATILE ORGANIC COMPOUNDS (VOC) FROM POWDER PRODUCTION UNITS**

These are the quantities of non-methane VOCs (NMVOCs) emitted into the air in tonnes of carbon equivalent per year during the operation of the powder production units.

France: powder (VOC) measurements are taken twice a year at the chimney outlet by an external company. The results of the flow of NMVOCs in kg equivalent C/h are multiplied by the number of hours of emission per powder stack (operating times are halved if two production units are on the same stack). NMVOC emissions are analyzed as per the XP X 43-554 standard and the site’s prefectural decree.

USA: VOC emissions are defined per US EPA 40 CFR 51.100(s) federal regulations. The emission factors used are derived from EPA regulations, guidance documents and/or performance tests. Measurements are taken annually.

China: to calculate VOCs in China, we take aggregate

VOC emissions from all other powder production sites. We take the average value of these emissions related to the overall amount of powder production. We then use this ratio to calculate China’s VOC emissions based on powder production in China.

**DUST EMISSIONS SECTION**

**DUST EMISSIONS FROM POWDER PRODUCTION UNITS**

These are the quantities of dust emitted into the air in tonnes per year during the operation of the powder production units.

France: the results of dust flow measurements in kg/h are multiplied by the number of hours of operation of the powder production units (operating times are halved if two production units are on the same stack). An external body measures the data on a six-monthly basis. Dust is measured as per French standard EN 13284-1.

USA: dust (particles) is defined as per US EPA 40 CFR 51.100(oo) federal regulations. The emission factors used are derived from EPA regulations and guidance

documents and/or performance tests. Measurements are taken annually.

China: to calculate dust in China, we take aggregate dust emissions from all powder production units. We take the average value of these emissions in relation to the overall amount of powder production.

**STAFF INDICATORS**

**TOTAL NUMBER OF EMPLOYEES**

Employees (employees present and employees whose employment contract is suspended, regardless of the nature of the contract) are included in the registered workforce as of December 31 of the year in question.

For France, all permanent, fixed-term, apprenticeship, and professional qualification contracts are included, except temporary staff and apprentices.

In the United States, this also includes interns and the staff of their permanent sites in Canada, Jamaica, and Colombia.

For India, temporary staff has only been included in the number of employees since 2020. They are now

treated as fixed-term contracts.

All files used to count the number of employees must be kept in order to find the value at 31/12 of the year in question.

### OCCUPATIONAL CATEGORY

The data is presented by occupational category.

In France, only two categories are considered, with the definition derived from collective bargaining agreements. Professionals are Sectors 2 and 3 (technician, supervisor and manager). Non-professionals are Sector 1 (blue-collar workers and other employees).

In the United States, only two categories are taken into account: professional and managers (including all employees performing white-collar jobs), and blue-collar workers (all employees in manufacturing and other blue-collar jobs).

In 2020, we added a new definition for China and modified the historical data accordingly due to the need to meet the requirements of the Jiangsu authorities:

- Professional personnel: diploma equal to or above that of Gaozhong (doctorate, master's degree,

bachelor's degree, secondary technical school, and Gaozhong (high school));

- Non-professional personnel: diploma below Gaozhong level.

### CHANGE IN THE WORKFORCE

Difference between the total workforce in the current and prior years

### HOURS OF TRAINING

Total number of hours of training: this covers all hours devoted to vocational training. It includes all external training, but also internal training at the workstation.

For France, there is a discrepancy between training completion and enrolment. As such, we apply a penalty of 30% to the prior year and 10% to the year before that. Training hours include training provided to all employees (permanent and fixed-term contracts, temporary staff, etc.). It consists of all external training as well as internal training at the workstation (accurate to 0.5 hours).

For the United States, training enrolment lists include all hours worked until the training checklist is completed. A percentage is assigned to those hours to reflect actual training time in the workplace.

### NUMBER OF HOURS PER EMPLOYEE

The number of training hours per employee: this is the total number of training hours (see point 4) divided by the total number of employees for the year.

Training documents for all employees (certificates, attendance sheets, etc.) must be kept as of the closing date.

### HEALTH AND SAFETY INDICATORS (SNF employees)

#### NUMBER OF DEATHS

This is the number of deaths due to industrial accidents.

#### NUMBER OF DEATHS PER 100 MILLION HOURS WORKED

The calculation is as follows:

$(\text{number of deaths} \times 100,000,000) / \text{number of hours worked}$

#### NUMBER OF HOURS WORKED

These are the actual working hours over the year for all employees, including training hours (excluding temporary staff).

For non-supervisory staff, overtime is included.

7 hours per day are counted for people on a daily rate. Hours spent on business travel and assignments are counted as hours worked. Days of sick leave and paid leave are excluded from the calculating of hours worked.

### NUMBER OF ACCIDENTS WITH LOST TIME

These are accidents at work (including commuting or traveling) that resulted in at least 1 day of lost time (day of the accident + 1 day).

France: these values are given for a specific date but may be revised several months later by the French health authorities and accidents may be reclassified as non-work related.

China: only accidents with a minimum of 3 days of lost time are counted (the company covers the first 2 days).

### LOST TIME ACCIDENT RATE PER MILLION HOURS WORKED

The calculation is as follows: (number of lost-time accidents x 1,000,000)/number of hours worked.

### NUMBER OF REPORTABLE ACCIDENTS (with and without lost time)

These are accidents at work with and without lost time that resulted either in at least 1 day of lost time or a medical consultation (with declaration to a government body).

France: this data is provided at a specific date but may be revised several months later by the French health authorities and accidents may be reclassified as non-work related.

### REPORTABLE ACCIDENT RATE PER MILLION HOURS WORKED

The calculation is as follows: (number of reportable accidents x 1,000,000)/number of hours worked.

### NUMBER OF DAYS LOST

France: days lost due to a workplace accident are counted in calendar days from the first day lost. This only includes lost time due to the accident in the current year.

USA: days lost are calculated per federal law (Occupational Safety & Health Act).

### NUMBER OF FIRST AID TREATMENTS

These are accidents that only required internal

treatment by the occupational health service or a first-aid attendant and did not result in lost time or an external medical consultation.

### SEVERITY RATE

The calculation is as follows: (number of days lost x 1,000)/number of hours worked.

France: days lost due to a workplace accident are counted in calendar days from the first day lost. This only includes lost time due to the accident in the current year.

**Cross-Reference Table Between CSR Standards and SNF Indicators**

*(While these indicators are not all present in this report, they are regularly monitored by SNF and reported in its Tennaxia management system)*

**SNF INDICATORS ENVIRONMENT**

	GRI REFERENCES	GLOBAL COMPACT PRINCIPLES	U.N SUSTAINABLE DEVELOPMENT GOALS
<b>WATER</b>			
Water consumption	GRI 303-5	Principle 8	ODD 12
Ratio Water consumption / Total production (m3/t)	GRI 303-5	Principle 8	ODD 12
Ratio water consumption / Turnover (m3/MEuros)	GRI 303-5	Principle 8	ODD 12
Released water Volume	GRI 303-4 & GRI 306-1	Principle 7 & 8	ODD 6
Ratio Released water / Water consumption (m3/m3)	GRI 303-4 & GRI 306-1	Principle 7 & 8	ODD 6
Ratio Released water / total production (m3/t)	GRI 303-4 & GRI 306-1	Principle 7 & 8	ODD 6
Ratio Released water / Turnover (m3/MEuros)	GRI 303-4 & GRI 306-1	Principle 7 & 8	ODD 6
Wastewater treatment plant yield for nitrogen	GRI 303-2	Principle 7 & 8	ODD 6
Wastewater treatment plant yield for COD	GRI 303-2	Principle 7 & 8	ODD 6
Wastewater treatment plant yield for BOD	GRI 303-2	Principle 7 & 8	ODD 6
Wastewater treatment plant yield for SM (Suspended Matter)	GRI 303-2	Principle 7 & 8	ODD 6
<b>NITROGEN</b>			
Amount of nitrogen in released water leaving the site	GRI 303-4 & GRI 306-1	Principle 7 & 8	ODD 6
Amount of nitrogen in released water in the natural environment	GRI 303-4 & GRI 306-1	Principle 7 & 8	ODD 6
Ratio Nitrogen for released water/ Volume of released water in the natural environment (kg/m3)	GRI 303-4 & GRI 306-1	Principle 7 & 8	ODD 6
Ratio Nitrogen for released water in the natural environment / Total production (kg/t)	GRI 303-4 & GRI 306-1	Principle 7 & 8	ODD 6
Ratio nitrogen for released water in the natural environment / turnover (kg / MEuros)	GRI 303-4 & GRI 306-1	Principle 7 & 8	ODD 6

**SNF INDICATORS  
ENVIRONMENT**

	GRI REFERENCES	GLOBAL COMPACT PRINCIPLES	U.N SUSTAINABLE DEVELOPMENT GOALS
<b>COD</b>			
Chemical oxygen demand (COD) in released water leaving the site	GRI 303-4 & GRI 306-1	Principle 7 & 8	ODD 6
COD quantity in released water in the natural environment	GRI 303-4 & GRI 306-1	Principle 7 & 8	ODD 6
Ratio COD / Volume of released water ratio in the natural environment (kg/m3)	GRI 303-4 & GRI 306-1	Principle 7 & 8	ODD 6
Ratio COD in the natural environment / Total production (kg/t)	GRI 303-4 & GRI 306-1	Principle 7 & 8	ODD 6
Ratio COD in the natural environment / Turnover (kg / MEuros)	GRI 303-4 & GRI 306-1	Principle 7 & 8	ODD 6
<b>BOD</b>			
Biological Oxygen Demand (BOD)	GRI 303-4 & GRI 306-1	Principle 7 & 8	ODD 6
BOD quantity in released water in the natural environment	GRI 303-4 & GRI 306-1	Principle 7 & 8	ODD 6
Ratio BOD / Volume of released water ratio in the natural environment (kg/m3)	GRI 303-4 & GRI 306-1	Principle 7 & 8	ODD 6
Ratio BOD in the natural environment / Total production (kg/t)	GRI 303-4 & GRI 306-1	Principle 7 & 8	ODD 6
Ratio BOD in the natural environment / Turnover (kg / MEuros)	GRI 303-4 & GRI 306-1	Principle 7 & 8	ODD 6
<b>SOLID SUSPENDED</b>			
Solid suspended in released water leaving the site	GRI 303-4 & GRI 306-1	Principle 7 & 8	ODD 6
Quantity of Solid suspended in released water in the natural environment	GRI 303-4 & GRI 306-1	Principle 7 & 8	ODD 6
Ratio Solid suspended in released water / Volume of released water in the natural environment (kg/m3)	GRI 303-4 & GRI 306-1	Principle 7 & 8	ODD 6
Ratio Solid suspended in released water in the natural environment / Total production (kg/t)	GRI 303-4 & GRI 306-1	Principle 7 & 8	ODD 6
Ratio Solid suspended in released water in the natural environment / Turnover (kg / MEuros)	GRI 303-4 & GRI 306-1	Principle 7 & 8	ODD 6

**SNF INDICATORS ENVIRONMENT**

**ENERGY CONSUMPTION**

	GRI REFERENCES	GLOBAL COMPACT PRINCIPLES	U.N SUSTAINABLE DEVELOPMENT GOALS
Electricity consumption	GRI 302-1	Principle 7 & 8	ODD 12
Ratio Electricity consumption / Total energy consumption (%)	GRI 302-1	Principle 7 & 8	ODD 12
Natural gas consumption	GRI 302-1	Principle 7 & 8	ODD 12
Natural gas consumption (Giga Joule)	GRI 302-1	Principle 7 & 8	ODD 12
Ratio Natural gas consumption / Total energy consumption (%)	GRI 302-1	Principle 7 & 8	ODD 12
Total Energy consumption (MWh LHV)	GRI 302-1	Principle 7 & 8	ODD 12
Ratio Total energy consumption / Total production (MWh/t)	GRI 302-1	Principle 7 & 8	ODD 12
Ratio Total energy consumption / Turnover (MWh/MEuros)	GRI 302-1	Principle 7 & 8	ODD 12
Electricity consumption	GRI 302-1	Principle 7 & 8	ODD 12

**ATHMOSPHERIC EMISSIONS**

Nox (Nitrogen oxide) in relation with natural gas consumption	GRI 305-7	Principle 7 & 8	ODD 3 & 12
Ratio NOx / Total production (t/t)	GRI 305-7	Principle 7 & 8	ODD 3 & 12
Ratio NOx / Turnover (t/MEuros)	GRI 305-7	Principle 7 & 8	ODD 3 & 12
SOx (sulfur oxides) in relation with the natural gas consumption	GRI 305-7	Principle 7 & 8	ODD 3 & 12
Ratio SOx / Total production (t/t)	GRI 305-7	Principle 7 & 8	ODD 3 & 12
Ratio SOx / Turnover (t/MEuros)	GRI 305-7	Principle 7 & 8	ODD 3 & 12
CFC emissions (t refrigerant gas leak) = fugitive emissions (part of scope 1)	GRI 305-7	Principle 7 & 8	ODD 3 & 12
Ratio CFC / Total production (tCO2e/t)	GRI 305-7	Principle 7 & 8	ODD 3 & 12
Ratio CFC / Turnover (tCO2e/MEuros)	GRI 305-7	Principle 7 & 8	ODD 3 & 12

**SNF INDICATORS  
ENVIRONMENT**

**ATHMOSPHERIC EMISSIONS**

	GRI REFERENCES	GLOBAL COMPACT PRINCIPLES	U.N SUSTAINABLE DEVELOPMENT GOALS
CO2 emissions (Scope 1) in relation with gas consumption (excluding fugitive emissions due to CFC leaks and excluding VOCs)	GRI 305-1	Principle 7 & 8	ODD 3, 12 & 13
CO2 emissions (Scope 1) in relation with gas consumption and fugitive CFC leaks (excluding VOCs)	GRI 305-1	Principle 7 & 8	ODD 3, 12 & 13
CO2 emissions (Scope 2) in relation with electricity and steam consumptions	GRI 305-2	Principle 7 & 8	ODD 3, 12 & 13
Ratio CO2 emissions (Scope 1 & 2) / Total production (tCO2e/t)	GRI 305-1 & GRI 305-2	Principle 7 & 8	ODD 3, 12 & 13
Ratio Natural gas consumption / Total energy consumption (%)	GRI 302-1	Principle 7 & 8	ODD 12
Ratio CO2 emissions (Scope 1 & 2) / Turnover (tCO2e / MEuros)	GRI 305-1 & GRI 305-2	Principle 7 & 8	ODD 3, 12 & 13
VOC (Volatil Organic Compounds) from powder workshops	GRI 305-7	Principle 7 & 8	ODD 3 & 12
Ratio VOC / Total production (kg/t)	GRI 305-7	Principle 7 & 8	ODD 3 & 12
Ratio VOC / Turnover (t/MEuros)	GRI 305-7	Principle 7 & 8	ODD 3 & 12
Dust emissions from powder workshops	GRI 305-7	Principle 7 & 8	ODD 3 & 12
Ratio Dust emissions from powder workshops / Total production (kg/t)	GRI 305-7	Principle 7 & 8	ODD 3 & 12
Ratio Dust emissions from powder workshops / Turnover (t/MEuros)	GRI 305-7	Principle 7 & 8	ODD 3 & 12

**WASTE**

Ratio Total Waste / Total production (t/t)	GRI 306-2	Principle 8	ODD 12
Ratio Total waste / Turnover (t/MEuros)	GRI 306-2	Principle 8	ODD 12

**SNF INDICATORS  
ENVIRONMENT**

**WASTE**

	GRI REFERENCES	GLOBAL COMPACT PRINCIPLES	U.N SUSTAINABLE DEVELOPMENT GOALS
Non hazardous waste : Incineration with energy recovery	GRI 306-2	Principle 8	ODD 12
Non hazardous waste : Incineration without energy recovery	GRI 306-2	Principle 8	ODD 12
Non hazardous waste : Inorganic recycling	GRI 306-2	Principle 8	ODD 12
Non hazardous waste : Metal recycling	GRI 306-2	Principle 8	ODD 12
Non hazardous waste : Organic recycling	GRI 306-2	Principle 8	ODD 12
Non hazardous waste : Landfill	GRI 306-2	Principle 8	ODD 12
Non hazardous waste : Others	GRI 306-2	Principle 8	ODD 12
Ratio Non hazardous waste / Total waste (%)	GRI 306-2	Principle 8	ODD 12
Ratio Total Waste / Total production (t/t)	GRI 306-2	Principle 8	ODD 12
Ratio Total waste / Turnover (t/MEuros)	GRI 306-2	Principle 8	ODD 12
Non hazardous waste : Incineration with energy recovery	GRI 306-2	Principle 8	ODD 12

**HAZARDOUS WASTE**

Hazardous waste: Incineration with energy recovery	GRI 306-2	Principle 8	ODD 12
Hazardous waste: Incineration without energy recovery	GRI 306-2	Principle 8	ODD 12
Hazardous waste: Inorganic recycling	GRI 306-2	Principle 8	ODD 12
Hazardous waste: Metal recycling	GRI 306-2	Principle 8	ODD 12
Hazardous waste: Organic recycling	GRI 306-2	Principle 8	ODD 12
Hazardous waste: Landfill	GRI 306-2	Principle 8	ODD 12
Hazardous waste: Others	GRI 306-2	Principle 8	ODD 12
Ratio Hazardous waste / Total waste (%)	GRI 306-2	Principle 8	ODD 12

**SNF INDICATORS  
ENVIRONMENT**

**OF WHICH RECOVERED WASTE**

	GRI REFERENCES	GLOBAL COMPACT PRINCIPLES	U.N SUSTAINABLE DEVELOPMENT GOALS
Total Valued waste (energy recovery)	GRI 306-2	Principle 8	ODD 12
Valued waste (energy recovery) (sites)	GRI 306-2	Principle 8	ODD 12
Total Valued waste (excluding energy recovery)	GRI 306-2	Principle 8	ODD 12
Valued waste (excluding energy recovery) (sites)	GRI 306-2	Principle 8	ODD 12

**TRANSPORT**

	GRI REFERENCES	GLOBAL COMPACT PRINCIPLES	U.N SUSTAINABLE DEVELOPMENT GOALS
Transported volumes (m3)	GRI 305-3	Principle 7 & 8	ODD 12
Total number of km travelled (km)	GRI 305-3	Principle 7 & 8	ODD 12

**SNF INDICATORS  
PRODUCTION**

**TURNOVER**

	GRI REFERENCES	GLOBAL COMPACT PRINCIPLES	U.N SUSTAINABLE DEVELOPMENT GOALS
Turnover	GRI 201-1		ODD 8

**PRODUCTION (POLYMÈRES, MONOMÈRES)**

	GRI REFERENCES	GLOBAL COMPACT PRINCIPLES	U.N SUSTAINABLE DEVELOPMENT GOALS
Total production	GRI 2		ODD 8
Global production (polymer/final product)	GRI 2		ODD 8
Global production (monomer)	GRI 2		ODD 8

**SNF INDICATORS  
SOCIAL**

**TOTAL WORKFORCE**

Total workforce

GRI REFERENCES	GLOBAL COMPACT PRINCIPLES	U.N SUSTAINABLE DEVELOPMENT GOALS
GRI 2-7		

**WORKFORCE BY GENDER**

Total staff male

GRI 2-7

Total staff female

GRI 2-7

Nb of women in management

GRI 2-7

ODD 5

Nb of women in company training programmes

GRI 2-7

ODD 5

**WORKFORCE BY AGE**

**WOMEN**

Staff female - AGE < 25

GRI 2-7

Staff female - AGE 25 - 29

GRI 2-7

Staff female - AGE 30 - 39

GRI 2-7

Staff female - AGE 40 - 49

GRI 2-7

Staff female - AGE > 50

GRI 2-7

**MEN**

Staff male - AGE < 25

GRI 2-7

Staff male - AGE 25 - 29

GRI 2-7

Staff male - AGE 30 - 39

GRI 2-7

Staff male - AGE 40 - 49

GRI 2-7

Staff male - AGE > 50

GRI 2-7

**SNF INDICATORS  
SOCIAL**

**WORKFORCE BY PROFESSIONAL SOCIAL CATEGORIES**

	GRI REFERENCES	GLOBAL COMPACT PRINCIPLES	U.N SUSTAINABLE DEVELOPMENT GOALS
Staff professional	GRI 102-8		
Staff non professional	GRI 102-8		

**CAREER MANAGEMENT**

Staff evolution	GRI 401		ODD 8
Nb of promotions	GRI 404		ODD 10
Number of promotions men	GRI 404		ODD 10
Number of promotions women	GRI 404		ODD 10
Nb of employees who have left the company	GRI 401		ODD 8
Employee turn-over rate (%)	GRI 401		ODD 8
Nb of employees who have change position	GRI 404		ODD 10
Internal mobility (%)	GRI 404		ODD 10

**TRAINING**

Total training hours	GRI 404-1	Principle 6	ODD 10
Total HSE training hours	GRI 404-1	Principle 6	ODD 10
Nb of training days	GRI 404-1	Principle 6	ODD 10
Annual training budget	GRI 404-1	Principle 6	ODD 10
Nb of employees having received training over the year under review	GRI 404-1	Principle 6	ODD 10
total training hours by employee	GRI 404-1	Principle 6	ODD 10

**SNF INDICATORS  
SOCIAL**

**WORKING CONDITIONS**

Nb of occupational diseases

GRI 403-10

Nb employees covered by collective agreements on working conditions

GRI 403-10

**DISABILITY SITUATION**

Nb of employees with disabilities

GRI 2-7

Principle 6

ODD 10

**REMUNERATION**

Average employee compensation

GRI 405

ODD 5

Average staff male compensation

GRI 405

ODD 5

Average staff female compensation

GRI 405

ODD 5

**ETHNIC MINORITY**

Average employee compensation

GRI 2-7

Principle 6

ODD 10

Average staff male compensation

GRI 2-7

Principle 6

ODD 10

**SNF INDICATORS  
HEALTH / SECURITY**

	GRI REFERENCES	GLOBAL COMPACT PRINCIPLES	U.N SUSTAINABLE DEVELOPMENT GOALS
<b>MAN-HOURS WORKED</b> Total Man-hours worked	GRI 403-2 & GRI 403-9		ODD 3
<b>LOST TIME INJURIES (ACCIDENT WITH WORK STOP)</b> Number of Lost Time Injuries (accident with work stop) Lost Time Injury Frequency Rate(LTIFR) per million man hours worked.	GRI 403-2 & GRI 403-9 GRI 403-2 & GRI 403-9		ODD 3 ODD 3
<b>LOST TIME INJURIES (ACCIDENT WITHOUT WORK STOP)</b> Number of Lost Time Injuries (accident WITHOUT work stop)	GRI 403-2 & GRI 403-9		ODD 3
<b>LOST TIME INJURIES (ACCIDENT WITH AND WITHOUT WORK STOP)</b> Number of total recordable injuries (accident with and without work stop) Number of total recordable injury/Million man hours Number of lost workday cases	GRI 403-2 & GRI 403-9 GRI 403-2 & GRI 403-9 GRI 403-2 & GRI 403-9		ODD 3 ODD 3 ODD 3
<b>FIRST AID CASES</b> Number of first aid cases	GRI 403-2 & GRI 403-9		ODD 3
<b>SEVERITY RATE</b> Severity rate	GRI 403-2 & GRI 403-9		ODD 3

**SNF INDICATORS  
SOCIAL**

**FATAL ACCIDENTS**

Number of fatalities

Fatal Accident Rates per 100 million man hours worked.

GRI REFERENCES

GLOBAL COMPACT  
PRINCIPLES

U.N SUSTAINABLE  
DEVELOPMENT GOALS

GRI 403-2 & GRI 403-9

ODD 3

GRI 403-2 & GRI 403-9

ODD 3

**ABSENTEEISM**

Nb of hours of absence

Rate of absenteeism

GRI 403-2 & GRI 403-9

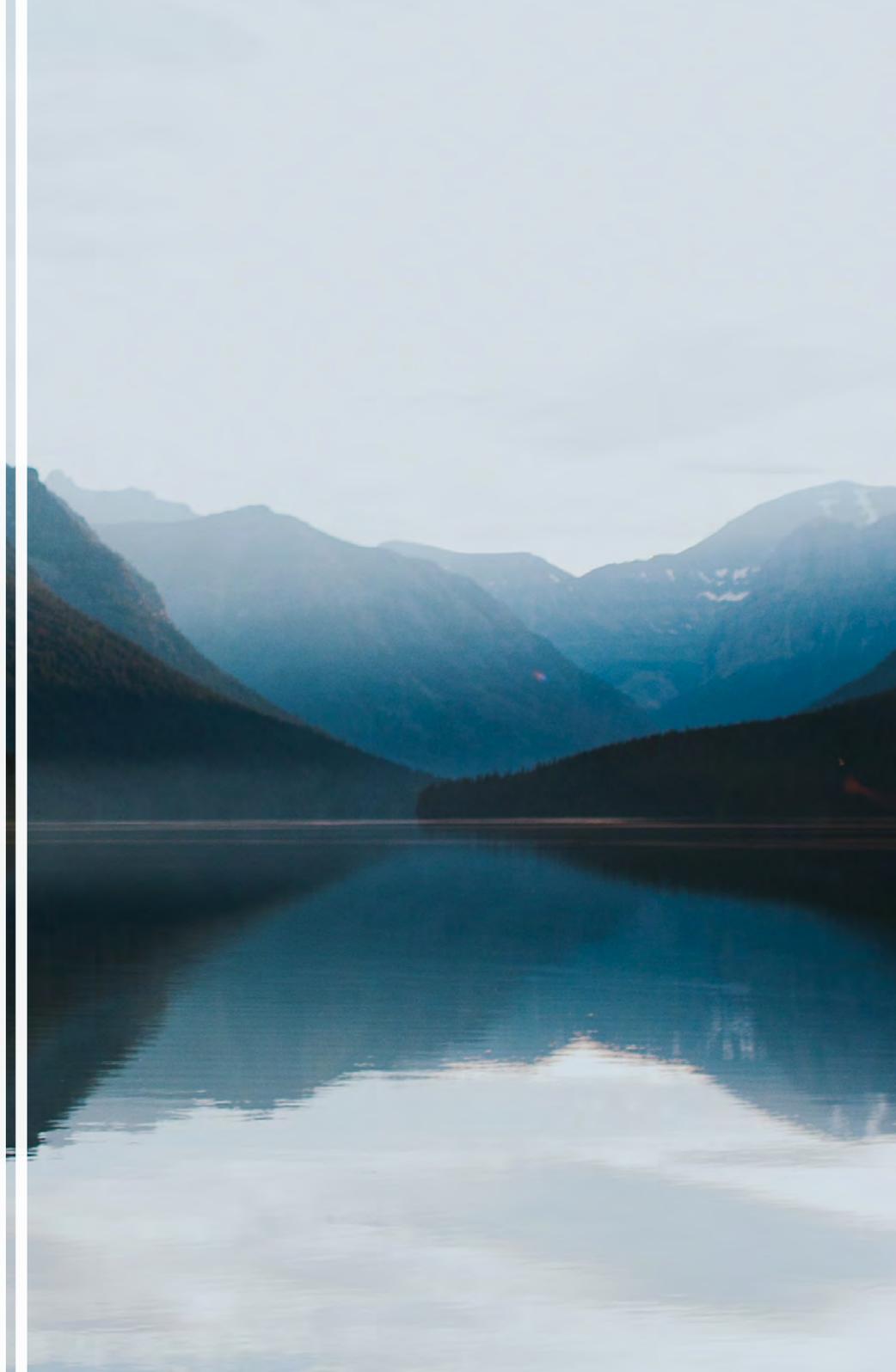
ODD 3

GRI 403-2 & GRI 403-9

ODD 3



# INDEPENDENT LIMITED ASSURANCE REPORT



## INDEPENDENT LIMITED ASSURANCE REPORT

**SPCM SA**  
**Société Anonyme**  
**ZAC du Milieux**  
**42160 ANDREZIEUX BOUTHEON (France)**

**REPORT BY ONE OF THE STATUTORY AUDITORS,  
APPOINTED AS INDEPENDENT THIRD PARTY,  
ON THE CONSOLIDATED NON FINANCIAL  
STATEMENT**

*Year ended December 31, 2021*

*This is a free translation into English of the Statutory Auditor's report issued in French and is provided solely for the convenience of English-speaking readers. This report should be read in conjunction with, and construed in accordance with, French law and professional standards applicable in France.*

To the Shareholders,

In our capacity as Statutory Auditor of SPCM SA (hereinafter the "Company"), appointed as independent third party ("third party") and accredited by the French Accreditation Committee (Cofrac), under number 3-1048 (Cofrac Inspection Accreditation, no. 3-1048, scope available at [www.cofrac.fr](http://www.cofrac.fr)) and currently adapting our management

system as required by the Cofrac for this accreditation (from ISO17020 to ISO 17029), we have conducted procedures to express a limited assurance conclusion on the historical information (observed or extrapolated) in the consolidated non-financial performance statement, prepared in accordance with the Company's procedures (hereinafter the "Guidelines"), for the year ended December 31, 2021 (hereinafter the "Information" and the "Statement", respectively), presented in the Group management report pursuant to the legal and regulatory provisions of Articles L. 225-102-1, R. 225-105 and R. 225-105-1 of the French Commercial Code (code de commerce).

### Conclusion

Based on our procedures as described in the section "Nature and scope of procedures" and the evidence we have obtained, no material misstatements have come to our attention that cause us to believe that the non-financial performance statement does not comply with the applicable regulatory provisions and that the Information, taken as a whole, is not fairly presented in accordance with the Guidelines.

### Comments

Without qualifying the conclusion expressed above and in accordance with Article A.225-3 of the French Commercial Code, we make the following comment: the calculation of certain key performance indicators presented in the Methodological Note is based on

definitions that may vary according to geographical location.

### Preparation of the non-financial performance statement

The absence of a generally accepted and commonly used reference framework or established practices on which to base the assessment and measurement of the Information enables the use of different but acceptable measurement techniques that may impact comparability between entities and over time.

Accordingly, the Information must be read and interpreted with reference to the Guidelines, summarised in the Statement and available on the Company's website or on request from its headquarters.

### Limits inherent in the preparation of the information relating to the Statement

The Information may be subject to uncertainty inherent to the state of scientific and economic knowledge and the quality of external data used. Some information is sensitive to the choice of methodology and the assumptions or estimates used for its preparation and presented in the Statement.

### Responsibility of the Company

The Board of Directors is responsible for:

- selecting or determining the appropriate criteria for the preparation of the Information;

- preparing a Statement pursuant to legal and regulatory provisions, including a presentation of the business model, a description of the main non-financial risks, a presentation of the policies implemented with respect to these risks as well as the outcomes of these policies, including key performance indicators;
- implementing such internal control as it determines is necessary to enable the preparation of Information that is free from material misstatement, whether due to fraud or error.

The Statement has been prepared by applying the Company's Guidelines as referred to above.

Responsibility of the Statutory Auditor appointed as independent third party

Based on our work, our responsibility is to express a limited assurance conclusion on:

- the compliance of the Statement with the requirements of Article R. 225-105 of the French Commercial Code;
- the fairness of the information provided pursuant to part 3 of sections I and II of Article R. 225-105 of the French Commercial Code, i.e. the outcomes of policies, including key performance indicators, and measures relating to the main risks, hereinafter the "Information."

As it is our responsibility to issue an independent conclusion on the information prepared by

management, we are not authorised to participate in the preparation of the Information, as this could compromise our independence.

It is not our responsibility to provide a conclusion on:

- the Company's compliance with other applicable legal and regulatory provisions (particularly with regard to the information set-out in the duty of vigilance and the fight against corruption and tax evasion);
- the compliance of products and services with the applicable regulations.

### **Applicable regulatory provisions and professional guidance**

We performed the work described below in accordance with Articles A. 225-1 et seq. of the French Commercial Code, the professional guidance issued by the French Institute of Statutory Auditors (Compagnie Nationale des Commissaires aux Comptes) relating to this engagement and acting as the verification programme and with the international standard ISAE 3000 (revised).

### **Independence and quality control**

Our independence is defined by Article L. 822-11-3 of the French Commercial Code and French Code of Ethics for Statutory Auditors (Code de déontologie). In addition, we have implemented a system of quality control including documented policies and procedures

aimed at ensuring compliance with applicable legal and regulatory requirements, ethical requirements and the professional guidance issued by the French Institute of Statutory Auditors (Compagnie Nationale des Commissaires aux Comptes) relating to this engagement.

### **Means and resources**

Our work engaged the skills of eight people between January 2022 and March 2022 and took a total of six weeks.

To assist us in conducting our work, we referred to our corporate social responsibility and sustainable development experts. We conducted around ten interviews with people responsible for preparing the Statement.

### **Nature and scope of procedures**

We planned and performed our work taking account of the risk of material misstatement of the Information.

We consider that the procedures conducted in exercising our professional judgement enable us to express a limited assurance conclusion:

- We familiarized ourselves with the activities and the description of the principal risks.
- We assessed the suitability of the Guidelines with respect to their relevance, completeness, reliability, neutrality and clarity, taking into account, where

appropriate, best practices within the sector;

- We verified that the Statement covers each category of information stipulated in section III of Article L. 225-102-1 governing social and environmental affairs.

- We verified that the Statement provides the information required under Article R.225-105 II of the French Commercial Code where relevant with respect to the principal risks, and includes, where applicable, an explanation for the absence of the information required under Article L.225-102-1 III, paragraph 2 of the French Commercial Code;

- We verified that the Statement presents the business model and a description of the principal risks associated with the activities, including where relevant and proportionate, the risks associated with their business relationships, their products or services, as well as their policies, measures and the outcomes thereof, including key performance indicators associated to the principal risks;

- We referred to documentary sources and conducted interviews to:

- assess the process used to identify and confirm the principal risks as well as the consistency of the outcomes, including the key performance indicators used, with respect to the principal risks and the policies presented, and
- corroborate the qualitative information (measures and outcomes) that we considered to be

the most important <sup>1</sup>; concerning certain risks (industrial, non-compliance, human rights, responsible supply chain) our work was carried out on the consolidating entity.

- We verified that the Statement covers the consolidated scope, i.e. all companies within the consolidation scope in accordance with Article L. 233-16, with the limits specified in the Statement.

- We obtained an understanding of internal control and risk management procedures implemented by the Company and assessed the data collection process aimed at ensuring the completeness and fairness of the Information;

- For the key performance indicators and other quantitative outcomes<sup>2</sup> that we considered to be the most important, we implemented:

---

1 Code of conduct and ethics ; EcoVadis assessment on Human Rights and working conditions ; Measures set up to manage industrial risks ; Measures set up to ensure compliance with local sites regulation

2 CO2 emissions in tonnes of carbon equivalent (emission factor of the natural gas and electricity used to produce our products), CFC/ HFC emissions, Wastewater volumes in m3, Water consumption in m3, COD of wastewater in kg Chemical Oxygen Demand, Hazardous waste in tonnes, Non-hazardous waste in tonnes, Waste-to-energy in tonnes, Waste-to-other in tonnes, Electricity consumption in MWh, Gas consumption in MWh, Lost time injury frequency rate, Total training hours, Headcount

- analytical procedures that consisted in verifying the correct consolidation of collected data as well as the consistency of changes thereto;
- substantive tests, on a sample basis and using other selection methods, that consisted in verifying the proper application of definitions and procedures and reconciling data with supporting documents.

These procedures were conducted for a selection of contributing entities<sup>1</sup> and covered between 21,5% and 89,5% of the consolidated data selected for these tests.

- We assessed the overall consistency of the Statement in relation to our knowledge of the company.

The procedures conducted in a limited assurance review are substantially less in scope than those required to issue a reasonable assurance opinion in accordance with the professional guidelines of the French National Institute of Statutory Auditors (Compagnie Nationale des Commissaires aux Comptes); a higher level of assurance would have required us to carry out more extensive procedures.

---

1 Site audit: Ulsan/séoul (South Korea), Andrézieux (France), consistency review: Riceboro (USA)

Lyon, 11th March 2022

One of the Statutory Auditors,

Deloitte & Associés

Dominique Vallette  
Associé, Audit

SNF (CHINA) FLOCCULANT Co. Ltd.  
Taixing economic development zone  
West of Tongjiang road  
Taixing City Jiangsu Province 225442  
CHINA

+86 523 767 6300  
commercial@snfchina.com  
www.snfchina.com

SNF Holding Company  
1 Chemical Plant Road  
Riceboro, Georgia 31323  
U.S.A.

+1 (912) 884-3366  
info@snfhc.com  
www.us.snf.com

SNF sa  
ZAC de Milieux  
rue Adrienne Bolland  
42163 Andrézieux Cedex  
FRANCE

+ 33 (0)4 77 36 86 00  
info@snf.com  
www.snf.com

**SNF**  
WATER SCIENCE