



# Modern Slavery Statement 2025

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# Modern Slavery Statement 2025

## Introduction

This Kemira Modern Slavery Statement is given by Kemira Oyj on behalf of itself and its UK affiliated company, Kemira Chemicals (UK) Ltd. (jointly hereinafter referred to as Kemira ). It covers the financial year 2025 and it is published in accordance with the UK Modern Slavery Act 2015. This statement has been approved by the Board of Directors of Kemira Oyj on February 11, 2026.

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## Our business and value chain

### **BUSINESS MODEL**

Kemira provides sustainable chemical solutions for water-intensive industries in three regional business areas: EMEA, APAC and the Americas. Kemira had operations in 37 countries and had 58 manufacturing facilities at the end of 2025. Kemira has a new operating model effective beginning of 2025. The new operating model has three business units: Water Solutions, Packaging & Hygiene Solutions and Fiber Essentials. The new operating model increases customer centricity as well as speed and agility.

Water Solutions offers chemical solutions for municipal and industrial water treatment for both drinking water and waste water treatment. Kemira's water treatment product portfolio mainly consists of coagulants and polymers which play a critical role in treating large volumes of water in societies, removing impurities from the water and enabling resource-efficient operations at our customers' sites. Packaging & Hygiene Solutions specializes in innovative and sustainable fiber-based solutions that support customers in transitioning to a circular economy by replacing fossil plastics with renewable fiber alternatives. Through close collaboration with its customers, Kemira continuously develops new solutions that meet requirements for strength, stiffness, weight, and overall quality. For liquid packaging and food service applications, strict hygiene and cleanliness standards are also upheld. Fiber Essentials has unique expertise in applying chemicals and in supporting pulp producers in innovating and constantly improving their operational efficiency as well as end-product performance and quality. The business unit develops and commercializes new product concepts to meet the needs of its customers, thus ensuring a leading portfolio of products and services for pulp processes.

## VALUE CHAIN

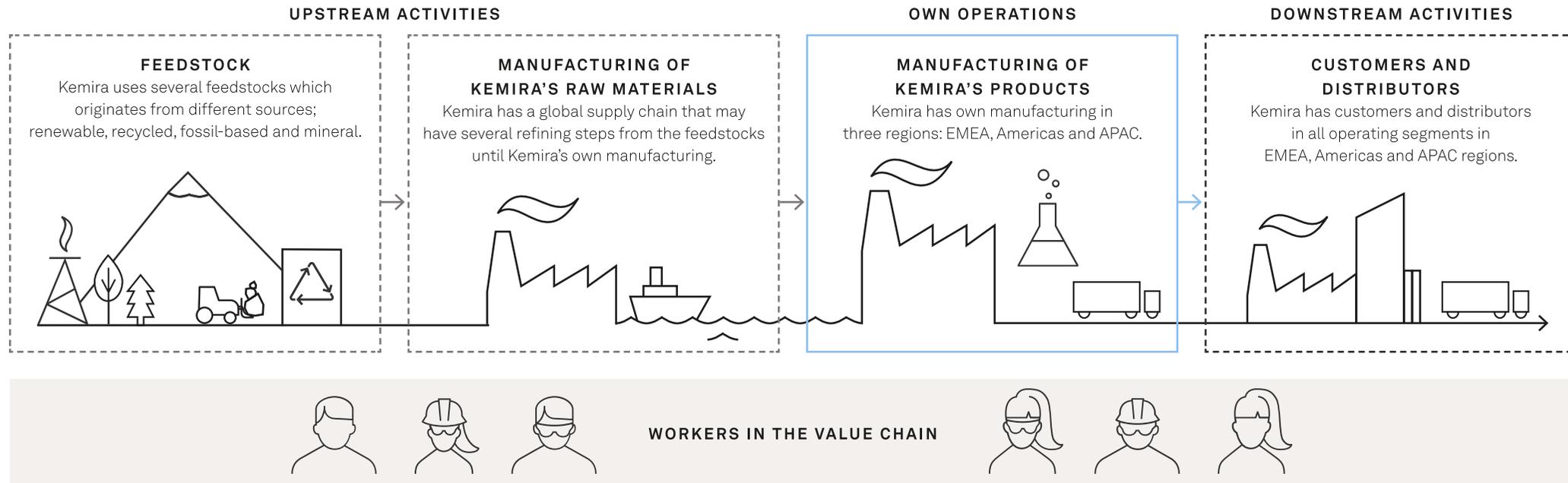
Kemira has a global raw material supply chain. Kemira's products are dependent on refined mineral, fossil, renewable and recycled raw material feedstocks. Kemira's position in the value chain is utilizing primary chemicals and further refining those into specialty chemicals.

Kemira's offering in all three business units, Water Solutions, Packaging & Hygiene Solutions and Fiber Essentials, focuses on:

- wide range of innovative solutions to optimize all stages of the water treatment process, while safely achieving water quality targets and meeting constantly tightening regulation.
- products and services which enhance customers' process efficiency and lead to lower energy, water and virgin raw material consumption
- new renewable carbon-based chemistry concepts that decouple materials from fossil value chains and reduce customer carbon footprint in the end-of-life of the product
- chemistry concepts which enhance the quality of the end products
- digital services to optimize the customers' processes

Kemira has identified high risk countries within its upstream and downstream value chains which have an increased risk of the use of child and forced labor. The increased risk is particularly evident in the APAC region. The high-risk countries have been defined by a third-party, utilizing a set of different human rights and labor rights related indices that are publicly available (Business social compliance initiative 2022, Labor Rights index, Global Rights index).

## KEMIRA VALUE CHAIN



## Our key policies concerning business relationships

Kemira's Board of Directors has approved the new Code of Conduct (the "Code") which provides a framework around the company's values and reflects its commitments towards its stakeholders. Kemira's values and the Code are an expression of who we are as a company and how we want to be perceived by our stakeholders. Together, the corporate values and the Code are the foundation of Kemira's business conduct.

Kemira's corporate values were created by a large number of Kemira employees who voiced their opinions on what they appreciate about Kemira and what kind of common beliefs and ways of working should be strengthened within the company. The corporate values are: **We are committed to customers' success, We drive performance and innovation, We care for people and the environment and We succeed together.**

The Code translates the corporate values into concrete commitments, offering guidance on how we conduct our business. Kemira's Code emphasizes that its decisions and actions must be guided by integrity and ethics. The Code gives the organization and everyone working for Kemira the guidance and principles they need to adhere to the highest standards of integrity, legal compliance and ethical conduct.

According to the Code, being a responsible business means committing to internationally recognized principles on human rights, labor conditions, the environment and anti-corruption. Kemira is committed to all applicable laws and voluntary frameworks. We support the United Nations Global Compact, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises, and reflect those principles in our Code. Kemira is a signatory of Responsible Care®, the voluntary initiative of the International Council of Chemical Associations.

The Code applies to every Kemira employee and the Board of Directors of the Company. The Code reminds Kemira staff that they are all personally responsible for the decisions they make and the actions they take. The Code serves as a guide to help to uphold the ethical standards set by the Company.

The Code sets out that everyone at Kemira must act in accordance with the Code, the company policies, and applicable laws and regulations. Managers are expected to support

and hold their team members accountable for complying with the Code, and to foster an environment where team members feel safe and confident to voice their concerns. According to the Code, Kemira supports individuals to speak freely and report violations of the Code to dedicated reporting channels.

The Code of Conduct has been made public and it is available to Kemira staff in multiple languages.

In addition, all suppliers must follow Kemira's Code of Conduct for Business Partners in relation to all of their dealings with Kemira. The Code of Conduct for Business Partners is communicated to all suppliers during their supplier onboarding and also through the ordering process, as part of Kemira's terms and conditions. It sets forth the minimum standards of behavior business partners are expected to follow in terms of business conduct, human rights, environment and safety, product safety, quality and sustainability. d

### TRAINING AND CAPACITY BUILDING

The contents of the business conduct policies are part of the training for all employees at the beginning of their employment and there is repeat training, typically every two years. The Code of Conduct is trained to all employees and the other policies are trained to selected target groups of employees based on risk assessment. The training includes the key contents of Kemira's policies, standards and procedures and explains how to perform work in accordance with Kemira's policies and what consequences may follow from not complying with the policies. The main channel to deliver training is a globally used electronic training platform which can be used to keep track of the trainings offered to and taken by each employee. The platform enables Kemira to monitor that mandatory trainings are completed in a timely manner by the designated target groups.

## Due diligence on modern slavery and human trafficking

Sustainability is embedded into all operations, including Strategy and Enterprise Risk Management (ERM). From the Enterprise Risk Management perspective, integrating sustainability is crucial to mitigating risks and to ensuring long-term resilience. The separate materiality assessment helps to prioritize the most important risks in the annual reporting process. Kemira has systematic procedures in place to evaluate and address the

environmental, social and governance material impacts of its own operations and business relationships. Kemira's sustainability work is based on day-to-day responsible practices in all operations. The corporate sustainability priorities are based on the most material impacts across the business; on the increasing expectations of Kemira's customers, investors and other stakeholders and on company's commitment to the Kemira Code of Conduct and internationally agreed sustainability principles.

### IDENTIFICATION AND ASSESSMENT OF HUMAN RIGHTS RELATED IMPACTS, RISKS AND OPPORTUNITIES

The analysis of social related impact, risk and opportunity was based on internal interviews and materials as well as on Kemira's latest Human Rights Impact Assessment framework which was created in cooperation with an external partner. The methodology of the Human rights Impact Assessment was based on the United Nations Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance.

The identified material impacts, risks and opportunities were included in a more comprehensive analysis (Human Rights Due Diligence Risk Assessment) which was carried out together with Kemira's key subject matter experts. The analysis was built on the identification and assessment of affected stakeholders and a consideration of the high-risk factors related to Kemira's business model and strategy. The most significant high risk factors were assessed to be the nature of work for the different value chain worker groups who are likely to be impacted, geographical location and chemical properties and their usage volumes. Within each worker group particularly vulnerable workers were identified. The identification was done by assessing the potential negative impact against the nature of the work and the environment in which the actual work is conducted.

### MANAGEMENT OF THE IDENTIFIED IMPACTS, RISKS AND OPPORTUNITIES RELATED TO VALUE CHAIN WORKERS

Material impacts, risks and opportunities	Position in value chain	Key management areas of processes and policies
<b>Working conditions</b>		
○ Potential human rights violations e.g. health and safety issues in the value chain, particularly in high risk countries	↗ Upstream ↘ Downstream	<ul style="list-style-type: none"> <li>Code of Conduct and Code of Conduct for Business Partners lay out expectations for suppliers for respecting human rights and safe use of chemicals</li> <li>Supplier sustainability assessments and audits are carried out to identify risk with supplier human rights impacts, risks and management</li> <li>Product Stewardship Policy expresses Kemira's commitment to safe use of chemicals and priority substance management process aims to reduce the negative impacts of chemicals in the whole value chain</li> </ul>
○ Potential risks related to labour law practices in certain renewable feedstock value chains	↗ Upstream	<ul style="list-style-type: none"> <li>Code of Conduct: Kemira is committed to providing safe and healthy working conditions in all of Kemira's locations for both Kemira's own employees and contractors</li> <li>Kemira has implemented contractor pre-qualification, mandatory contractor safety induction and permit-to-work process</li> </ul>
● Health and safety incidents with contractors, a high risk group among value chain workers	● Own operations	
<b>Other work-related rights</b>		
○ Potential human rights violations e.g. child labour and forced labour in the value chain, particularly in high risk countries	↗ Upstream ↘ Downstream	<ul style="list-style-type: none"> <li>Code of Conduct and Code of Conduct for Business Partners lay out expectations for suppliers and Kemira's customers for respecting human rights</li> <li>Supplier sustainability assessments and audits are carried out to identify risks with supplier human rights impacts, risks and management</li> </ul>

● Own operations   ↗ Upstream   ↘ Downstream   ● Negative   ○ Potential negative

## **ACTIONS TO PREVENT AND MITIGATE THE POTENTIAL MODERN SLAVERY AND HUMAN TRAFFICKING RELATED RISKS**

### **Kemira's own operations**

According to Kemira's Code of Conduct, Kemira does not use any form of forced or child labor. Kemira acknowledges that in spite of mitigation procedures there could potentially be an increased risk related to these in certain high risk countries in which Kemira has operations: China, Brazil, India, Indonesia and South Korea. To mitigate this risk, Kemira conducts identity and age checks during the hiring process. Also, in many countries, the local labor laws and/or collective bargaining agreements have very extensive rules for young people, restricting working hours, work activities, work environments and overall health, well-being and educational opportunities.

### **Kemira's value chain**

Supplier management and supplier risk and compliance management are cornerstones of Kemira's sustainable sourcing roadmap which ensures responsibility in the supply chain. This is the global process for Kemira to identify and assess upstream related sustainability impacts, risks and opportunities. The focus of supplier management is on improving economic performance, anticipating risk and initiating approaches with suppliers that are responsible and innovative. It is described in three main processes: Supplier Segmentation, Supplier Performance Evaluations and the Vendor Value Program.

Kemira suppliers are segmented into four categories: strategic, critical, volume and base suppliers. They are prioritized based on multi-factor risk criteria to better help to manage supplier relationships and to plan actions for necessary risk mitigation. The Supplier Performance Evaluations program collects and provides regular feedback to suppliers, on both their operational and sustainability performance. The majority of strategic, critical and volume suppliers are part of regular supplier reviews. The Vendor Value Program aims to develop capabilities that will enable the identification, partnering with and management of suppliers, along the various value chains associated with Kemira's product lines. Kemira supplier risk and compliance management defines the requirements for suppliers to do business with Kemira, as well as provides tools and processes for mitigating sustainability risk with suppliers, e.g sustainability assessments and audits.

Kemira uses EcoVadis to carry out sustainability assessments for key suppliers, including those related to social matters. The assessment focuses on 21 sustainability criteria that are grouped into four themes: Environment, Labor & Human Rights, Ethics and Sustainable Procurement. The rating methodology measures the quality of a company's sustainability management system through 3 management pillars: Policies, Actions, and Results. Suppliers receive a sustainability scorecard with detailed insights into strengths and potential improvement areas. If the ratings do not meet Kemira performance criteria, suppliers are expected to take corrective action.

Kemira audits relevant direct material suppliers for quality and Corporate Social Responsibility (CSR), to ensure they meet expectations. The CSR audits are conducted by a certified third party and aim to ensure that suppliers do not violate Kemira's Code of Conduct. The quality audit validates suppliers' processes related to management systems, sustainability, workplace health and safety standards, production, quality and supply security. Supplier assessments and audits are part of sourcing processes and target setting for the Sourcing function and are monitored on a monthly basis. Audit results are reviewed together with suppliers, with improvement plans created and followed up as necessary as part of supplier management practices.

## **ASSESSING EFFECTIVENESS OF AVOIDING MODERN SLAVERY IN KEMIRA'S BUSINESS**

During 2025 Kemira did not receive any allegations of forced labor, child labor, human trafficking or any other forms of modern slavery in its own operation or in its value chain through its Ethics and Compliance hotline or other grievance channels. In the supplier audits no incidents of modern slavery were identified.

February 11, 2026

Kemira Oyj

Antti Salminen  
President & CEO