

UK Modern Slavery Statement for 2024

This statement is made in accordance with Section 54 of the UK Modern Slavery Act 2015 (the Act) and sets out the measures Evonik Group has taken during the financial year ending on 31 December 2024 to fulfil its policies and commitments and ensure that human rights violations including modern slavery and human trafficking are not taking place in its own operations and its supply chains.

August 1st, 2025

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This statement is published on behalf of Evonik Industries AG and the entire Evonik Group (hereafter referred to as “Evonik” / “we”). Evonik takes a group-wide approach to its human rights commitments, including modern slavery.

We understand modern slavery as an overarching term including forced labour, forced child labour, bonded labour or debt bondage, and human trafficking.

Organizational structure and supply chains of Evonik

Evonik is a specialty chemicals company group with headquarters in Germany. We have activities in more than 100 countries, production plants in 27 countries on six continents and about 32,000 employees worldwide. Major sites are in Western Europe, USA, China, Singapore, India and Brazil. Our specialty chemicals operations are structured into 13 business lines, organized into two segments from 2025 onwards (previously: three divisions): Custom Solutions, comprising solution- and innovation-driven businesses, and Advanced Technologies, made up of technology- and efficiency-driven businesses. They are supported by our Technology & Infrastructure Division. In 2024, Evonik generated sales of €15.2 billion.

Evonik’s procurement department is organized globally and comprises direct procurement (raw materials, logistics, and packaging) and indirect procurement (general and technical goods and services). Both are subdivided into strategic and operational procurement activities. Global procurement is managed from Germany, with the support of regional units in Asia and North and South America. In 2024, Evonik worldwide sourced raw materials and supplies, technical goods, services, energy, and other operating supplies with a total value of around €10.5 billion from around 33,000 suppliers in almost 100 countries. Evonik has the

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Register Court: Local Court Essen
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highest purchase volume in Europe, followed by the Americas and Asia.

Policies and governance on human rights including modern slavery

Evonik has clearly defined standards of conduct in place. Our policies are based on internationally recognized standards and principles like the:

- International Bill of Human Rights
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- ILO Declaration on Fundamental Principles and Rights at Work (ILO Core Labour Standards)

We comply with applicable laws or go beyond them everywhere we operate. In countries where local laws differ from internationally accepted human rights, we look for ways to implement the above international standards without coming into conflict with local legislation.

Our most relevant policies¹ are:

- Evonik Code of Conduct (2020)
- Evonik Policy Statement on Human Rights
- Evonik Code of Conduct for Suppliers

Our Code of Conduct sets out Evonik's most important principles and standards, which all employees must be aware of. It includes requirements around internationally recognized human rights, labour and social standards, including a prohibition of all forms of forced labour and modern slavery.

Our Human Rights Policy Statement applies to Evonik Industries AG, Evonik Operations GmbH and all companies over which these entities exercise a controlling influence (Evonik Group). At all other companies in which we are invested, we work to ensure that the above internationally recognized standards are observed. We

¹ All policies can be found on our website:

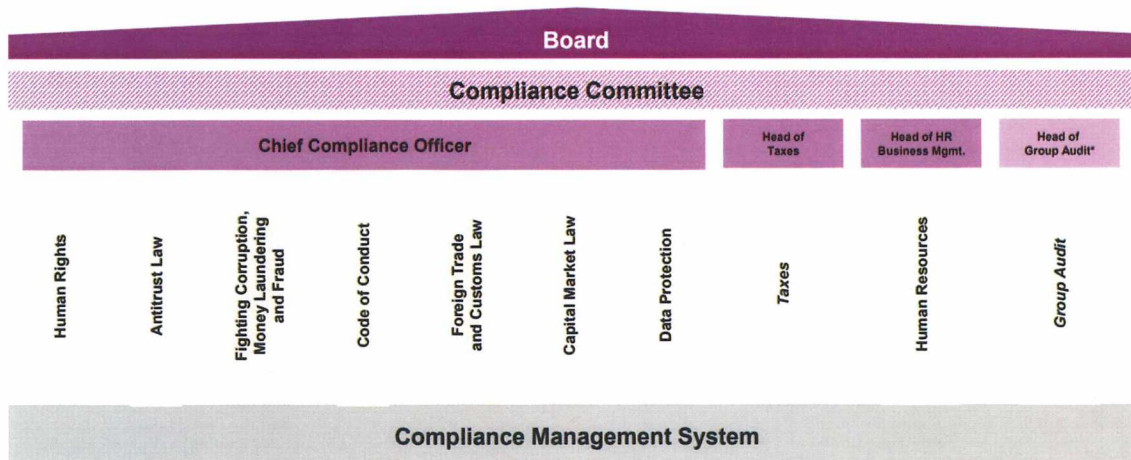
<https://corporate.evonik.com/en/sustainability/commitments/commitments-of-evonik-237314.html>

expect our employees to be familiar with this policy and to respect and actively support it in their daily work.

As a basis for successful cooperation, we expect our suppliers and other business partners to comply with our standards and to implement appropriate processes to respect human rights. The Evonik Code of Conduct for Suppliers specifies our expectations in this regard. It is communicated to all suppliers in our general terms and conditions of purchase, as well as via contractual compliance clauses.

Since 2022, human rights have been part of the “House of Compliance”, which covers the most relevant compliance areas for Evonik (see chart below). The Chief Compliance Officer sets and monitors the rules relevant to human rights and the voluntary commitments Evonik has made. We maintain a comprehensive Group-wide Compliance Management System (CMS) for human rights. Its implementation and continuous development are the responsibility of the Group Human Rights Officer. Additional responsibilities regarding human rights, including of other relevant functions, are set out in a RASCI (Responsible, Accountable, Supporting, Consulted, Informed) matrix. The objectives of the CMS Human Rights are a timely identification of human right risks in our own operations and supply chains and the establishment of preventive and remedial action to avoid, mitigate and/or end violations of human rights, including modern slavery.

House of Compliance



* Advisory Function

1 House of Compliance

Due diligence processes in relation to human rights

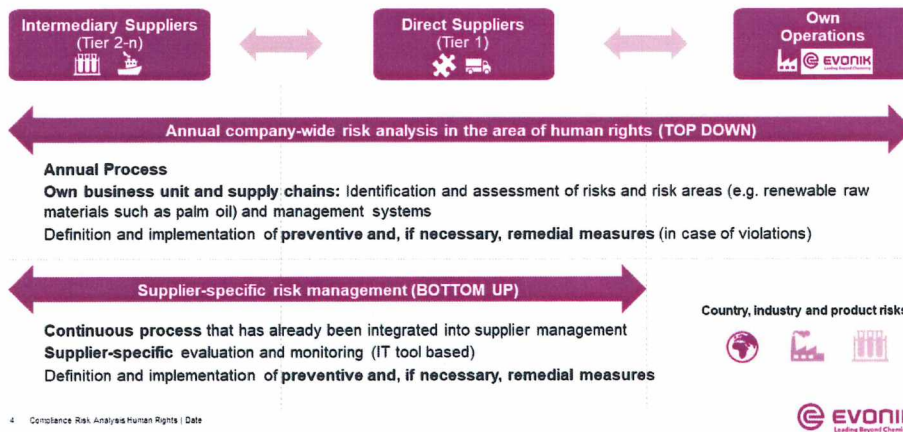
Risk assessment: Own operations and supply chains

The annual Group-wide human rights risk assessment covers Evonik's own business operations as well as our management of direct and indirect suppliers. In 2024, human rights risks were assessed in a desktop analysis and in a focus analysis covering prioritized risk areas in our own operations and supply chains.

In addition to the annual Group-wide human rights risk assessment, we also implement an ongoing supplier-specific risk management process – see “Supplier-specific risk assessment” below for further details.

The results of the annual Group-wide risk analysis and the supplier-specific risk management are linked to each other through regular exchange between the purchasing department and the Group Human Rights Officer. In this way, we achieve effective human rights and environmental risk management for our own business operations as well as direct and indirect suppliers. The chart below provides an overview of the two processes for the compliance risk analysis on human rights.

Compliance Risk Analysis Human Rights Overview



Supplier-specific risk assessment

We expect our suppliers and business partners to share our principles and act correctly in every respect, which means honouring their responsibility towards their employees, business partners, society, and the environment. We therefore validate new suppliers before entering a business relationship, and evaluate and develop existing suppliers during the business relationship.

New suppliers are subject to a self-developed supplier validation process based on the values defined in our Code of Conduct for Suppliers. Alongside quality, environmental protection, safety, health, and energy management, the assessment of potential risk factors includes labour and human rights (prohibition of forced and child labour as well as the right to freedom of association and collective bargaining), corruption prevention, conflict minerals, cyber security and responsibility within the supply chain. All details are entered online and evaluated using a validation matrix.

Successfully completed Together for Sustainability (TfS) ² assessments can similarly be used as evidence of validation.

² The chemical industry founded the Together for Sustainability (TfS) initiative to foster sustainability in supply chains via the joint development and implementation of a global assessment and audit program for responsible procurement of goods and services.

In 2024, we successfully evaluated 1,454 new suppliers, equivalent to over 79.5 percent of prospective new suppliers. The remainder was not successful in our evaluation, and the relevant supplier companies were deactivated within the procurement systems. In addition, TfS assessments were performed on 138 new suppliers of raw materials, technical goods, and services.

We apply the same care to evaluating existing suppliers. We use the EcoVadis IQplus tool to identify abstract human right risks – country and industry risks – related to direct suppliers. We then identify specific, supplier-related risks with the help of assessments and other tools from our partners EcoVadis/Together for Sustainability, IntegrityNext, and SIGNUM Consulting GmbH trading as DISA. Our preventive measures, training and awareness-raising to address these specific risks are outlined below.

Risk assessment: Business partners

We also assess business partners other than suppliers regarding human rights risks using our human rights and environmental assessment processes as part of mergers and acquisitions (M&A) and investment projects as well as our processes regarding compliance checks for intermediaries (e.g. agents and distributors) which include human rights related requirements.

Risk assessment results: Own operations

We are aware of certain general risks in terms of modern slavery in some countries where we operate. However, we did not identify any specific violations in our own operations.

Risk assessment results: Suppliers and business partners

As a company group in the chemical industry, we are confronted with the typical risks of this sector in our supply chains. We have pinpointed the following as being particularly high risk:

- Metallic and mineral raw materials due to the very high human rights risks – including child and forced labour – notably at the extraction stage, but also in the processing of these materials;
- Renewable raw materials due to the very high human rights risks – including child and forced labour – especially in the cultivation of certain raw materials;

- Services due to the high human rights risks to employees, especially those arising in connection with low-skilled and/or low-wage work and with regard to the deployment of subcontractors; and
- Logistics due to the high to very high human rights risks of certain shipping modes such as ocean freight and transportation of goods by road.

Preventive measures, training and awareness-raising: Own operations

In our own operations, we have a range of measures in place to address human rights risks, including risks of modern slavery and human trafficking. We are expanding these based on the results of the human rights risk analysis. In this, we can build on measures already in place, for example, in HR and ESHQE, and gradually extend and improve them. That includes taking a more global view of human rights and environment-related risks.

We know that awareness is key for recognizing and acting on actual or potential human rights risks and violations. We maintain a human rights training concept for our own operations. Employees who may identify or could even commit a violation of human rights because of their field of work are required to take a mandatory e-learning training, followed by a mandatory face-to-face training course. In addition, the e-learning module is open to all other employees on a voluntary basis. It is available in 13 languages, so about 97 percent of our employees subject to mandatory training can complete the module in their mother tongue.

We maintain a face-to-face training on human rights. The focal areas are dealing with human rights dilemmas (e.g. child labour) and the application of the principles in day-to-day work situations.

Preventive measures, training and awareness-raising: Suppliers and business partners

To address human rights and environmental risks – including modern slavery risks – identified in our supply chains, we implement and continue to develop preventive measures, training and awareness-raising activities. Our ongoing supplier-specific risk management process contains a set of mandatory and additional preventive measures which are assigned depending on a

supplier's risk level. These include for example Joint Improvement Plans following up on assessments or audits, awareness-raising and training, further analysis of suppliers' deeper value chain and joint measures with other purchasing companies or via sector/issue initiatives or standards, particularly for systemic issues.

Our general terms and conditions of purchase, which are referred to with every order, contain specific obligations for suppliers with regard to human rights due diligence processes. These are also part of individually negotiated contracts. If there are specific risks, we obtain separate assurances from suppliers or exclude the relevant sourcing countries from the outset. In the case of high-risk suppliers, we carry out special due diligences and/or audit measures prior to contract negotiations. In some procurement categories, Evonik undertakes to purchase raw materials only if relevant certifications are available, e.g. Roundtable on Sustainable Palm Oil (RSPO) for renewable raw materials.

Grievance mechanisms and remedial measures

Possible violations of human rights at or in connection with Evonik can be reported via internal channels and a generally accessible electronic whistle-blower system operated by an external service provider. Both employees and external stakeholders, such as business partners, supplier employees and local inhabitants near Evonik sites, can use this system, which is available in 20 languages, to report grievances and (potential) violations to Evonik. The system has a separate category for human rights, including forced labour/modern slavery, and any reports on this topic are channelled directly to the Group Human Rights Officer.

Alongside the electronic whistleblower system, (suspected) violations of regulations or policies can be reported to the responsible compliance officers by phone, email or letter.

We are working continuously to improve the effectiveness of our grievance channels.

Effectiveness

Compliance Management System Human Rights

The Chief Compliance Officer is responsible for reviewing the effectiveness of the Compliance Management System for human rights.

Grievance channels

The number of complaints and grievances raised via our various grievance channels helps us to assess whether our prevention measures regarding human rights, modern slavery and human trafficking are appropriate and effective. However, this is only the case if (potentially) affected groups know and trust the grievance system. In the 2024 reporting year, we received few reports on human rights and environmental issues. None of these related to modern slavery or human trafficking. We are therefore continuously working to further improve the accessibility of our grievance procedures. In addition, we will continue to raise awareness of how to spot signs of modern slavery, as well as of our grievance mechanisms, with our own employees and potentially affected third parties. Our training and awareness-raising activities serve this purpose.

Human rights trainings

In 2024, we achieved a human rights training rate (both e-learning and face-to-face training) of 84 percent in relation to 1,601 training candidates worldwide.

All participants of the face-to-face human rights trainings receive a questionnaire with questions about the use of the training for their daily work. Among other aspects, 80% see a good or very good relationship between the trainings and everyday working life. We will successively develop and implement further indicators to measure the effectiveness of the training measures.

Targets and objectives

For Evonik, identifying and addressing human rights and modern slavery risks and impacts is a continuous process. To strengthen our approach in the future, we plan to:

- Continue to implement appropriate preventive measures arising from the annual Group-wide human rights risk analysis.
- Continue to implement processes for remedial measures.

- Continue to raise awareness of human rights and modern slavery risks in our own operations by conducting human rights trainings in our global operations.
- Establish further processes to measure the effectiveness of our human rights trainings as well as other preventive and remedial measures within our own operations and supply chains.
- Further improve the accessibility of our grievance procedures, in particular for groups that are more vulnerable to risks of modern slavery.

Endorsed by the executive board (signed 1st August 2025)

