

The California Transparency in Supply Chains Act (CTSCA)

At IMCD, our values and guiding principles are essential to the way we operate and key to fulfil our ambition to deliver sustainable and profitable long-term growth. We strive to operate in an environmentally friendly way, we respect international labor standards and human rights, and we do not tolerate unethical behavior. We expect our Supply Chain partners do the same.

- 1. Commitment to Compliance:** IMCD US is committed to full compliance with The California Transparency in Supply Chains Act (CTSCA). We recognize the importance of transparency and ethical conduct in our supply chains.
- 2. Risk Assessment:** IMCD US conducts regular assessments of its supply chains to identify and mitigate risks related to human trafficking and slavery. These assessments include evaluating the countries of origin of our products and the specific risks associated with each region.
- 3. Supplier Audits:** IMCD US conducts audits of its suppliers to ensure compliance with labor and human rights standards. These audits are conducted by qualified personnel and may include on-site visits, interviews with workers, and reviews of relevant documentation.
- 4. Supplier Approval:** IMCD US requires its suppliers to comply with all applicable laws and regulations, including those related to human trafficking and slavery. Suppliers must also agree to adhere to IMCD's Supplier Code of Conduct, which prohibits forced labor, child labor, and other forms of exploitation.
- 5. Employee Training:** IMCD US provides training to its employees on recognizing and addressing issues related to human trafficking and slavery in the supply chain. This training includes information on relevant laws and regulations, as well as best practices for identifying and reporting potential violations.
- 6. Internal Accountability:** IMCD US maintains internal accountability standards to ensure compliance with CTSCA and other relevant laws and regulations. Employees who violate company policies related to human trafficking and slavery are subject to disciplinary action, up to and including termination of employment.
- 7. Collaboration and Transparency:** IMCD US collaborates with industry partners, non-governmental organizations, and government agencies to address human trafficking and slavery in global supply chains. We are committed to sharing information and best practices to drive positive change throughout the industry.

Conclusion: At IMCD US, we are dedicated to upholding the highest standards of ethical conduct in our supply chains. Through our commitment to compliance, risk assessment, supplier audits, employee training, internal accountability, collaboration, and transparency, we strive to prevent human trafficking and slavery and promote respect for human rights throughout our operations.

For more information on our commitment to labor practices and human rights, please visit [IMCD Sustainability - Labour Practices and Human Rights](#).

[IMCD US] will regularly review and update this policy as necessary to ensure continued compliance with CTSCA and other relevant laws and regulations.



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