

Australian Modern Slavery Act Statement 2024

The Commonwealth Modern Slavery Act 2018 (the “Act”) established Australia’s national Modern Slavery Reporting Requirement. It aims to support the Australian business community to identify and address their modern slavery risks and maintain responsible and transparent supply chains. The Act requires companies that conduct business in Australia to disclose what efforts their organizations engage in to ensure their supply chain is free of modern slavery which can include trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour (“Modern Slavery”).

The information provided herewith applies to Element Solutions Inc as the reporting entity on behalf of its subsidiaries confirmed to have conducted business via direct sales in Australia within the 2023 calendar year (Appendix A). Element Solutions Inc (collectively with its subsidiaries where the context requires, “Element Solutions”) has implemented a comprehensive corporate social responsibility program intended to help it operate within high standards of business ethics and in accordance with applicable laws and regulations. Element Solutions has a zero-tolerance approach to Modern Slavery in the manufacturing of its products and is committed to ensuring its supply chain is free of human rights abuses.

Structure and Operations

Element Solutions’ common stock is publicly traded on the New York Stock Exchange under the ticker symbol “ESI”. It operates as a leading global specialty chemicals company whose businesses supply a broad range of solutions that enhance the performance of products people use every day. Through its two business segments, Electronics and Industrial & Specialty, the company formulates and markets dynamic chemistry solutions that are used in several key industries, including consumer electronics, power electronics, semiconductor fabrication, communications and data storage infrastructure, automotive systems, industrial surface finishing, consumer packaging, and offshore energy.

Element Solutions is headquartered in the United States with locations globally, including 67 manufacturing and R&D sites in 18 countries. With operations and over 5,300 full-time employees in more than 50 countries, Element Solutions services customers directly around the world. Business is generated through the efforts of regional sales, technical and service personnel as well as distributors. In addition to regional sales and service staff, we maintain a group of global personnel focused on coordinating sales projects and obtaining design specifications for complex projects involving multiple customers within the manufacturing supply chain.

Supply Chain Overview

Element Solutions businesses formulate a broad range of specialty chemicals created by blending raw materials and incorporating them into multi-step technological processes. Our global operations depend upon obtaining adequate supplies of raw materials on a timely basis. Our priority is to diversify suppliers and source materials locally, where possible, or as needed. We typically purchase our major raw materials as needed from outside sources and work closely with these suppliers to help ensure continuity of supply while maintaining high quality and reliability. Furthermore, we recycle certain raw materials, primarily tin,

in our smelting and refining facility in the U.S. for further use in our manufacturing process. Customers rely on our capability to timely deliver products of constant quality which are integral to their manufacturing processes and overall product performance. The ability to meet these expectations relies on continuous access to multiple sources of raw materials and working closely with our suppliers and contract manufacturers to help ensure continuity of supply while maintaining high quality. Approved or conformant suppliers worldwide may deliver raw materials, semi-finished and finished components, and products.

Relevant Policies

Element Solutions has established robust supply chain risk management policies to guide our responsible supply chain practices, including with respect to the materials and minerals we purchase for use in our products and the suppliers with whom we choose to partner. These policies apply to all our suppliers around the world and reinforce our commitment to strictly prohibit the use of forced labor, child labor, and human trafficking in our operations and supply chain.

- **Business Conduct & Ethics Policy** – This policy highlights our support and respect for protecting internationally proclaimed human rights. Element Solutions will not tolerate human rights violations and is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that Modern Slavery is or may be taking place in any part of its own business or supply chains.
- **Supplier Code of Conduct** – We expect our suppliers to hold themselves and their suppliers to the same ethical standards as Element Solutions uses for its own operations. This policy provides specific risk assessment recommendations and highlights examples of actual or potential noncompliance. It further reinforces to our suppliers, that they must abide by fair and humane employment practices and uphold the human rights of workers. Suppliers must also treat employees with dignity and respect as understood by the international community.
- **Anti-Slavery and Human Trafficking Policy** - This policy applies to all persons working for Element Solutions or on our behalf in any capacity. It underscores our attentiveness to ensuring that Modern Slavery is not taking place within our organization or in any of our supply chains.

These policies are available on the [Policies page](#) of Element Solutions' sustainability website.

Element Solutions will not tolerate suppliers found to be in violation of these policies or have been confirmed to be engaged in any unlawful situations and reserves the right to terminate its business relationship with any such supplier.

Addressing Risk Through Due Diligence and Remediation

Element Solutions' comprehensive supplier vetting process utilizes industry-leading platforms. This process allows us to preemptively screen and evaluate for any known ethical and compliance risks associated with counterparties around the world. Using these platforms assists our business units in validating all new and existing supplier relationships by identifying risk exposure and mitigation throughout our supply chain. This multi-level risk model covers multiple risk domains and is capable of

reporting adverse media flagging known human rights abuses, including forced or compulsory labor and child labor. We regularly review suppliers identified in the database using a standardized risk rating system of low, medium, and high levels. Those associated with a high level of risk are subject to additional due diligence and ethical training based on principles outlined in our supply chain risk management policies. If the additional information requested is not promptly provided, is considered unsatisfactory, or if the training is not completed, we escalate to the appropriate manager for review and remediation, including but not limited to, discontinuing that particular business relationship.

Furthermore, Element Solutions' broader legal and compliance organization works closely with our supply chain leaders and procurement teams to maintain responsible sourcing due diligence efforts. Together, we periodically conduct supplier audits and may survey the anti-slavery compliance programs and policies of new supplier relationships before or during the onboarding process. Additional emphasis is placed on suppliers located in countries that are perceived to have a higher likelihood of potential forced labor issues. Supply chain risk management efforts and challenges are reported to the company's internal Environment, Sustainability and Governance (ESG) Committee, which takes an active role in enforcing the execution of our policies and measuring our ESG performance.

Element Solutions' quality organization also monitors the supply base. This also includes auditing suppliers when concerns arise regarding their adherence to certain requirements. For example, if products do not meet the applicable specifications, a detailed audit is performed. During such audits, a supplier's social compliance efforts and Modern Slavery risks may be reviewed according to a standardized checklist.

To date and to our knowledge, Element Solutions has not had to take any actionable measures to remediate any Modern Slavery violations in our supply chain.

Training & Effectiveness

Element Solutions requires training on our supply chain risk management policies and all relevant employees are trained to ensure a high level of understanding of the risks of Modern Slavery in the supply chain. Employees and certain suppliers receive this mandatory training using our online training platform. We also provide related training sessions and refreshers on an annual basis. New modules of existing training courses are added where and when necessary. In addition, we offer targeted specialized ethical and compliance training for those employees in certain locations or functions, either online or in person. In 2024, we plan to introduce training sessions to all relevant procurement teams dedicated to responsible sourcing and sustainable business practices. We use all these training opportunities to create an awareness of Modern Slavery and to foster a culture of ethical and compliant behavior throughout Element Solutions and beyond.

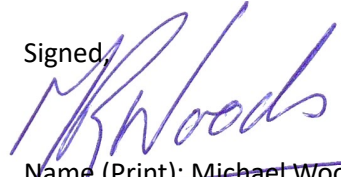
We believe Element Solutions' training and due diligence process outlined is effective. All business partners within our supply chain are regularly reminded of our zero-tolerance approach to Modern Slavery through the requirements established during the contracting process (Purchased Orders, Terms & Conditions, etc.). While Element Solutions is continually evaluating and evolving its supply chain best practices, we are satisfied that our suppliers have devoted sufficient attention and resources to the issue of Modern Slavery risks. This can further be evidenced by our acceptance into the world's largest industry coalition dedicated to responsible business conduct in global supply chains and active membership in both the Responsible Business Alliance (RBA) and the Responsible Minerals Initiative (RMI). Our supply chain and responsible sourcing practices have also been reviewed and validated by numerous third-party

auditors certified by the RBA. For the third consecutive year, Element Solutions has earned an EcoVadis Medal and a ranking on Newsweek's list of America's Most Responsible Companies, solidifying our position as a leader in sustainable business practices.

Statement Approval

This statement has been reviewed and approved by the country manager of Australia in their capacity as the principal governing body of H.K. Wentworth Pty Limited, a subsidiary of Element Solutions Inc.

Signed,

A handwritten signature in blue ink that reads 'M Woods'.

Name (Print): Michael Woods

Title: General Manager

Date: 12th July 2024

Appendix A:

The following are subsidiaries of Element Solutions Inc that have had confirmed business activities in Australia and are covered by this Modern Slavery Statement for the 2023 reporting year.

Legal Entity Name	Country of Incorporation
Alpha Assembly Solutions	Singapore
Compugraphics International Limited	United Kingdom
Compugraphics Jena GmbH	Germany
Coventya GmbH	Germany
Coventya South East Asia Pte. Ltd	Singapore
Fernox Limited	United Kingdom
H.K. Wentworth Pty Limited	Australia
MacDermid Graphics Solutions, LLC	Australia
MacDermid Alpha Electronics Solutions	Singapore
MacDermid Autotype Limited	United Kingdom
MacDermid Enthone GmbH	Germany
MacDermid Performance Solutions	Singapore
MacDermid Performance Solutions Taiwan Ltd	Taiwan
MacDermid Performance Solutions UK Limited	United Kingdom
MacDermid, Incorporated	United States