



TOPSOE

TOPSOE HUMAN RIGHTS POLICY

AUGUST 2025

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Objective

Topsoe is dedicated to conducting business responsibly, upholding integrity and respect in alignment with the Topsoe Spirit, our Code of Conduct, and endeavoring to fulfill our commitment to respecting human rights. As a participant in the UN Global Compact (UNGC), we are committed to integrating UNGCs ten principles into all aspects of our business practices.

Scope

This policy applies to Topsoe's operations, and we expect all employees to uphold the objectives and commitments outlined in the Topsoe Code of Conduct. Similarly, our suppliers are expected to comply with the specific expectations detailed in our Supplier Code of Conduct and ensure their own suppliers do the same. Additionally, we encourage our customers to embrace similar commitments.

Our commitments

Topsoe is committed to respecting human rights and aligns its efforts with the UN

Guiding Principles on Business and Human Rights as well as the OECD Guidelines for Multinational Enterprises. We view these principles as essential global frameworks that guide and shape our approach to ensuring responsible business practices.

We are committed to upholding key international human rights standards and conventions, including:

- The International Bill of Human Rights
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work

Topsoe seeks to uphold international human rights wherever we operate, including where applying human rights principles are permitted by, but not required by, local laws.

We uphold our commitment to respecting human rights through our Code of Conduct, Supplier Code of Conduct, and various internal policies and procedures which are referenced below.

Grievance and access to remedy

We recognize the importance of engaging with both potentially affected and impacted rightsholders. Our goal is to actively collaborate with them to identify risks of negative impacts and to develop preventive and mitigating measures as applicable and appropriate.

The Topsoe Compliance Hotline offers all internal and external rightsholders a platform to report actual or potential human rights concerns. For Topsoe employees, additional channels such as the bi-annual engagement survey, the Work Council, Health & Safety Committees, and the DE&I Committee provide further opportunities to raise concerns or share feedback.

We seek to address and remediate any actual adverse human rights impacts that we cause or contribute to by working collaboratively with relevant stakeholders to ensure access to appropriate remedies.

Governance

Our Chief Sustainability and External Affairs Officer oversees the Human Rights Policy, with implementation driven by the Global Sustainability team and business leads. The Board of Directors provides oversight to ensure human rights risks and impacts are appropriately managed.

This policy statement has been approved by Topsoe A/S Chief Executive Officer, Roeland Baan on August 2025 and is effective as of that date.

Reference to relevant Topsoe policies and statements

The policies are subject to periodic review, whereas the statements are updated annually.

- Topsoe Code of Conduct
- Topsoe Supplier Code of Conduct
- Global Health & Safety Policy
- Global Diversity & Inclusion Policy
- Responsible Minerals Sourcing Policy
- UK Modern Slavery Act Statement