



TOPSOE

UK MODERN SLAVERY ACT STATEMENT

2025

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About this statement

This statement is published in accordance with the requirements of the UK Modern Slavery Act 2015 and sets out the steps taken by Topsoe A/S and subsidiaries to prevent modern slavery and human trafficking in business operations and supply chains during the financial year 2025.

About Topsoe

Topsoe is a leading global provider of advanced technology and solutions for the energy transition. Built on decades of scientific research and innovation, we are working with customers and partners to drive energy resiliency and to achieve their sustainability goals.

We offer world-leading solutions for transforming renewable resources into fuels and chemicals, and we provide technologies needed to produce lowcarbon and conventional fuels and chemicals as well as ensuring clean air.

We were founded in 1940 and are headquartered in Denmark, with over 2,800 employees serving customers all around the globe. Topsoe is owned by Topsøe Holding A/S and Dahlia Investment Pte. Ltd. (which is wholly-owned by Temasek Holdings Pte. Ltd.).

To learn more, visit [→ Topsoe.com](https://topsoe.com).

Supply chain

We source raw materials, technical hardware components and services from more than 400 suppliers globally. For other goods, materials and services that support our business activities, we have more than 2,700 suppliers.

Supplier spending primarily occurs within the following expenditure categories.

- Commodity Metals
- Chemicals
- Building & Facility Management

Policy commitment

As a signatory of the UN Global Compact, Topsoe supports and respects the protection of all human rights as described in the Universal Declaration of Human Rights, the International Bill of Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work.

To fortify our commitment to respecting human rights and thereby the elimination of modern slavery and human trafficking, we have established several policies and the Topsoe Code of Conduct, as summarized below. Read more on [→ Topsoe.com](https://topsoe.com).

→ **Human Rights Policy:** In alignment with the UN Guiding Principles (UNGPs), Topsoe's Human Rights Policy clearly expresses our dedication to respecting human rights across our value chain, preventing any violations, and addressing any negative human rights impacts that may arise from our activities.

→ **Topsoe Code of Conduct:** The Topsoe Code of Conduct expresses our commitment to upholding human rights in all aspects of our business worldwide and serves as a compass, pointing us towards the right actions and decisions, both individually and collectively.

→ **Sustainability Policy:** This policy outlines our commitment to respect international human and labor rights, striving to avoid negative impacts on these rights in all aspects of our business.

→ **Supplier Code of Conduct:** The Supplier Code of Conduct outlines requirements toward our suppliers within human and labor rights, health and safety, environmental matters and business ethics.

→ **Responsible Minerals Sourcing Policy:** This policy requires that relevant suppliers comply with applicable regulations, such as the EU Conflict

Minerals Regulation, and adhere to the standards of due diligence established by the Responsible Minerals Initiative, promoting transparency around Topsoe's sourcing of conflict minerals and cobalt.

Human rights due diligence

The chemical industry, including the business of Topsoe, is generally associated with a relatively low risk of forced labor, and with the potential risk being highest in the supply chain. We strive to select business partners who share our commitment to high ethical standards, enacted through risk assessments of suppliers, customers, and end-users.

Our relationship with business partners, such as suppliers and intermediaries, is based on mutual respect, open dialogue, and a common commitment to follow principles of transparency and integrity in our interactions, in line with the principles stated in the Topsoe Code of Conduct. We address risks in our supply chain through our supplier onboarding process, which includes risk-based due diligence and a requirement that any third-party relationship complies with the Topsoe Supplier Code of Conduct and with applicable regulations, including those concerning human rights. Specifically for the sourcing of minerals classified as 'conflict minerals', we seek to mitigate risk of forced labor through our Responsible Minerals Sourcing Policy and related due diligence processes.

Training & capacity building

Topsoe's Code of Conduct e-learning course, which is mandatory for all Topsoe employees, raises awareness of the principles in our Code of Conduct, including Topsoe's commitment to doing business responsibly and sustainably. Relevant employees are additionally trained in applicable requirements relating to Topsoe's commitment to human rights, including labor, health & safety and 'conflict minerals' requirements. Furthermore, we provide ongoing training to our supply chain teams within the procurement department, specifically in responsible procurement and sustainability practices.

Access to remedy

The [Topsoe Compliance Hotline](#) (a confidential, third-party administered, online access channel), gives Topsoe's people, partners and affected members of the public a way to speak up, anonymously if desired, if they know or believe something has occurred or could occur that breaches the law, threatens human life, health, or the environment, or poses a material risk to Topsoe as a company. This includes but is not limited to serious breaches of workplace environment rules, such as harassment or discrimination on the basis of gender, race, handicap, or other protected category, committed by Topsoe employees or our business partners. The Topsoe Supplier Code of Conduct requires our suppliers to equally establish a grievance mechanism that allows for anonymous reporting of any serious concerns or breaches relating to

the topics described in Topsoe's Supplier Code of Conduct.

Next steps to prevent modern slavery in our business and supply chains

Going forward, it is Topsoe's ambition to establish a Human Rights Framework that encompasses comprehensive human rights governance, due diligence, and accountability measures to ensure a robust foundation for continuous improvement of our due diligence practices across our value chain. With such a Framework, we strive to embed an even stronger human rights focus throughout our business.

Approval

This statement was approved by the Board of Directors of Topsoe A/S on September 26, 2025.



Elena Scaltritti
Chief Executive Officer, Interim CEO