TOPSOE

UK MODERN SLAVERY ACT STATEMENT

2026

UK MODERN SLAVERY ACT STATEMENT 2026

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 2026.

About Topsoe
Topsoe is a leading global provider of advanced energy transition solutions for producing clean and conventional fuels and chemicals. 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 catalysts and technologies for transforming resources into renewable, low-carbon and conventional fuels and chemicals, as well as ensuring clean air.

We were founded in 1940 and are headquartered in Denmark, with around 2,500 employees serving customers all around the globe.
To learn more, visit → Topsoe.com.

Supply chain
We source raw materials, technical hardware components, and services from more than 400 suppliers globally. In addition, we work with more than 2,700 suppliers across the globe that provide other goods, materials, and services supporting our business activities.

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.

- → **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 may also receive training on selected requirements related to Topsoe's commitment to human rights, including areas such as labor, health & safety, and conflict minerals. 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 encompassing comprehensive human rights governance, due diligence, and accountability measures, providing a robust foundation for the continuous improvement of our due diligence practices across our value chain. Several steps in the development and implementation of this Framework are expected to be carried out during 2026. Through this Framework, we aim 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 October 23, 2026.



Elena Scaltritti
Chief Executive Officer, CEO