

## Nynas AB

## Modern Slavery and Human Trafficking statement – 2025

Nynas Group (hereafter referred to as "Nynas") recognises that modern slavery and human trafficking is a serious global issue that affects all industries and sectors. Modern Slavery is a crime and a violation of fundamental human rights. We are aware that Modern Slavery takes various forms, including slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have policies and processes in place to safeguard against this within our organisation and require the same of our supply chain.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

This statement is made in pursuance to section 54 of the Modern Slavery Act 2015

# Our organisation and supply network

Nynas is a global company that manufactures and supplies raw materials essential to global development. We work in collaboration with our customers to develop and provide products and processes that create sustainable value.

Nynas' corporate governance is detailed here.

Our internal management system includes Group policies and guidelines applicable to all employees, these include compliance with our people, human rights and ethics. Governing policies and procedures are routinely reviewed and updated at defined intervals. Our People and Human Rights Policy which covers modern slavery and human trafficking was reviewed in May 2025.

Nynas' production and supply network encompasses three production facilities located in Nynäshamn, Gothenburg, and Eastham, which are dedicated to the production of bitumen and naphthenic specialty products. The Nynäshamn site, established in 1928, stands as the largest facility within the Nynas Group and serves as a principal supplier of bitumen for road construction in Sweden and the Nordic countries. The Gothenburg facility, which focuses on both bitumen and specialty products, has undergone significant investments aimed at enhancing product quality and sustainability. The Eastham site caters to the UK market with polymer-modified binders and emulsions.

Additionally, Nynas' extensive depot system spans markets in Europe, South America, South Africa, India, and Singapore, thereby ensuring efficient distribution and robust customer support. Nynas Naphthenics operates globally, whilst Nynas Bitumen operations focus on Northern Europe.



## Policies

We have several policies in place to assist us in our in ensuring compliance with the section 54 of the Modern Slavery Act 2015.

Nynas' <u>Code of Conduct</u> sets out the basic rules and ethical framework which Nynas expects all its employees and suppliers to commit to, respect and act in accordance with.

Our People and Human Rights Policy states: *…illegal employment of children (child labour) is prohibited. Nynas will never, knowingly tolerate slavery or forced labour. No one shall be required to perform forced or compulsory labour for or on behalf of Nynas or its partners.* 

In addition, our Whistleblowing Policy provides a reporting method for our staff and others to alert us to any concerns they may have. This provides a second line of defence in assuring our compliance with modern slavery and is managed by our Compliance team.

Other supporting policies include:

- Nynas Sustainability Policy
- Competition Compliance Policy
- Global Anti-bribery & Anti-corruption Policy
- Nynas Health, Safety, Security, Environment and Quality (HSSE&Q) Policy
- Nynas Procurement Policy

We support the principles set out in the <u>United Nations' Universal Declaration of Human</u> <u>Rights</u> and the <u>International Labour Organization Declaration on Fundamental Principles and</u> <u>Rights at Work</u>.

## Due diligence

Nynas endeavours to work with businesses who have adopted similar values and ethics. We expect them to comply with basic rules for human rights and implement this approach throughout their supply chain. We have a Supplier Pre-Qualification document (SPQD). which is sent to potential and contract renewing suppliers globally. Responses are used to evaluate supplier acceptability.

Furthermore, under our risk-based due diligence process, critical and important suppliers undergo additional screenings. We work with an independent external ESG information provider to systematically evaluate supplier risk based on a range of sustainability and human rights indicators. In addition, we request these suppliers to complete in-depth selfassessment questionnaire, and we perform targeted audits to verify compliance and implement corrective actions when needed.



#### Business and supply chain risk areas

Nynas operates globally. Our procedures are adapted and regularly reviewed to ensure compliance with local laws and regulations.

We areas assess geographical risk through our risk management processes and reference published reports such as the Global Slavery Index. This assessment will provide guidance for our business practices and strengthen our engagement with our supply chain to mitigate any risk of modern slavery and human trafficking.

We will review our pre-qualification measures and adapt and enforce changes where necessary.

#### Awareness and Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we recognise the importance of staff training and Nynas will share this statement with all our staff through internal processes such as our cascaded HSSE&Q meetings.

Looking ahead, trainings related to modern slavery, human rights, and responsible sourcing will be delivered through our internal training platform, Nynas Academy. This centralized system ensures consistent content delivery, easier tracking of completion rates, heightened awareness, and ongoing compliance with due diligence commitments.

#### Measuring Effectiveness and Strengthening Future Action

While no concerns have been raised through our grievance mechanism to date, we recognise the importance of maintaining vigilance and accessibility in our reporting channels as well as our ability to identify and respond to emerging risks more effectively.

In preparation for the next reporting period, we are reinforcing our internal processes, including a comprehensive review of our due diligence framework and the implementation of a new system to collect and monitor key performance indicators (KPIs) to assess the effectiveness of our measures and protocols.

Stockholm, 11 June 2025

Eric Gosse President & CEO

Nynas AB