

CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT OF 2010 DISCLOSURE



Ecovyst Catalyst Technologies LLC, Zeolyst International, and Eco Services Operations Corp. (collectively, the “Company”) are all committed to conducting business in an ethical manner that respects human rights. The Company expects all of the Company’s current and future vendors, suppliers, contractors, consultants, agents and other providers of goods and services (our “Suppliers”) to conduct their businesses in a similar manner. As such, the Company has adopted a Supplier Code of Conduct. Our Suppliers are expected to adhere to the requirements of our Supplier Code of Conduct as part of their continued business relationship with the Company. Our Supplier Code of Conduct explicitly prohibits the trafficking of persons and the use of any form of slave, involuntary, bonded, indentured or prison labor. Involuntary labor is defined in our Supplier Code of Conduct to include the transportation, harboring, recruitment, transfer, receipt, or employment of persons by means of threat, force, coercion, abduction, fraud or payments to any person having control over another person for the purpose of exploitation. The Company’s Suppliers are expected to take reasonable steps to ensure that the provisions of our Supplier Code of Conduct are communicated throughout their organizations and throughout their own supply chain.

The information outlined below contains the Company’s disclosure of its efforts to eliminate slavery and human trafficking from its direct supply chain, as required by the California Transparency in Supply Chains Act of 2010 (Sen. Bill No. 657 (Steinberg)):

Verification of product supply chain to evaluate and assess risks of human trafficking and slavery.

The Company periodically conducts preannounced site visits at its Suppliers’ facilities as part of its overall supplier-management strategy. If our employees observe conditions during site visits that indicate that the Supplier is not living up to our Supplier Code of Conduct’s requirements concerning labor practices, including evidence of slavery and human trafficking, these observations will be communicated to management. The Company does not currently use third-parties to verify compliance with its labor standards.

Audits of suppliers to evaluate compliance with company standards regarding human trafficking and slavery in its supply chain.


In its Supplier Code of Conduct, the Company reserves the right to audit its Suppliers to evaluate their compliance with our Supplier Code of Conduct’s prohibitions against human trafficking and slave, involuntary, bonded, indentured or prison labor.

Requires suppliers to certify that their products comply with local laws and regulations, including those regarding slavery and human trafficking.

The Company’s contracts with its Suppliers require Suppliers to comply with all applicable laws, which include laws and regulations regarding slavery and human trafficking. **The Company reserves the right to require Suppliers to certify that they adhere to the standards contained in our Supplier Code of Conduct, which specifically prohibits Suppliers from engaging in human trafficking and using slave, involuntary, bonded, indentured or prison labor. The Company expects Supplier to comply with the standards contained in our Supplier Code of Conduct.**

Maintenance of internal accountability standards and procedures for employees or suppliers that fail to meet the company’s standards regarding slavery and human trafficking.

The Company’s employees are required to adhere to the standards contained in the Company’s Code of Conduct, which contains the guiding principles the Company’s directors, officers and employees are required to adhere to when dealing with each other and the Company’s customers, Suppliers, competitors and other third parties.



The Company's Code of Conduct states that it is the policy of the Company to comply with all applicable laws, which includes laws and regulations regarding slavery and human trafficking, and that employees are encouraged to report any suspected violations of the Company's Code of Conduct to their human resources department or the Company's outside legal counsel. The Company has also established a process by which employees can report suspected violations anonymously through a toll-free, 24-hour hotline that is operated by a third-party. Information received through the hotline is reviewed by the Company's compliance team, which then takes appropriate action to address suspected violations. Violations of the Company's Code of Conduct, including participation in or failure to report incidents of slavery or human trafficking, are grounds for disciplinary measures, including termination of employment with the Company.

As indicated above, the Company is in the process of communicating its Supplier Code of Conduct to Suppliers operating under existing contracts, and expects to require all new Supplier contracts to include certifications concerning adherence with its standards. In the event that the Company discovers that a Supplier is violating the standards in the Company's Supplier Code of Conduct regarding slavery and human trafficking, Company management is directed to take appropriate action, including terminating the Company's relationship with the Supplier. In certain circumstances, the Company may allow the Supplier to take corrective action to prevent future violations. If the Company determines that the Supplier is continuing to commit violations after being given an opportunity to improve its practices, the Company will terminate its relationship with the Supplier.

Provides training on slavery and human trafficking to employees and management having direct responsibility for supply chain management.

All Company employees receive annual training concerning the Company's Code of Conduct. Such training includes modules on compliance with laws and the Company's labor standards. The Company is in the process of developing special training concerning slavery and human trafficking for employees and managers with responsibility for supply chain management.