



KRONOS™

# Human Rights Policy

## Overview

This Human Rights Policy (“Policy”) sets forth the guiding principles of human rights by which we operate our company and conduct our daily business within our company and with our customers, suppliers, and communities. The principles and guidelines set out in this Policy apply to all employees of Kronos Worldwide, Inc. and each of its subsidiaries (“KRONOS”).

Respect for human rights is a fundamental value of KRONOS. As a manufacturer in the global supply chain, we understand the importance of addressing human rights and strive to respect and promote human rights in our relationships with our employees, suppliers, and customers. This Policy addresses certain individual rights, including labor practices, workplace health and safety, employee development, diversity and inclusion, and fair wages.

We are committed not only to compliance with applicable laws in these areas but also to the observance of human rights both internally and externally in our sphere of influence.

This Policy is guided by globally recognized standards, including the UN Guiding Principles on Business and Human Rights, the provisions of the UN Universal Declaration of Human Rights, and the Conventions of the International Labour Organization (ILO).

This Human Rights Policy falls under and is guided by our Code of Business Conduct and Ethics, which provides the guiding principles for all aspects of our business.

KRONOS governance documents are available on our website at:  
[www.kronosww.com/esg/reports-and-documents](http://www.kronosww.com/esg/reports-and-documents).

## Application of law

KRONOS will comply with applicable laws adopted in every country and locale where we operate. Where local law is more or less strict than this policy, KRONOS will follow the stricter law or policy. In situations where local law is silent on human rights, this policy will still apply.

## Scope

The principles set out here apply to all employees of KRONOS. In addition, we expect our suppliers and other business partners to align with these principles and to implement appropriate processes to respect human rights. This includes that they abide by our Supplier Code of Conduct (discussed below) and provide information to us on how they comply with these principles when requested to do so.

## Governance and accountability

This policy is approved by our CEO who oversees our work on human rights with the support of our Chief Transformation Officer (CTO). This policy was created with input from our Human Resources and ESG departments, which monitor progress on our human rights work.

The company coordinates activities, sets priorities, and implements company-wide and local site efforts to respect human rights.



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Responsibility for the specific implementation of our human rights strategy rests with our VP of Human Resources.

### Forced labor and human trafficking

KRONOS prohibits the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking.

### Child labor

KRONOS respects and supports children's rights consistent with the United Nations Convention on the Rights of the Child (CRC). We uphold zero tolerance of exploitation of children or adolescents in any form. As permitted by, and in accordance with, local law in certain KRONOS locations, KRONOS engages workers between the ages of 16 and 18 for work in apprenticeship positions. We maintain appropriate procedures to verify age and eligibility to work at the time of employment and will not knowingly place underage workers in jobs that could compromise their health or welfare.

### Work hours, wages, and benefits

KRONOS complies with applicable laws on wages, benefits, and overtime and ensures wages paid to employees are not unlawfully withheld. KRONOS works to provide all employees a living wage, calculated in accordance with best practices as determined in collaboration with external experts. KRONOS ensures wages paid to employees meet or exceed the applicable national legal minimum wage, or the minimum wage established for the industrial sector, and provides employees with corresponding employment benefits. Similarly, KRONOS ensures that worktimes comply with applicable national and local laws, industrial sector standards, and local labor agreements to provide and protect employees' time off work.

### Diversity and inclusion

KRONOS promotes a respectful and diverse workplace in which all individuals are treated with respect and dignity. KRONOS is an equal opportunity employer and bases employment decisions on merit, competence and qualifications, without regard to race, color, national origin, gender, age, religion, disability, sex, sexual orientation or other characteristics protected by law in the jurisdictions in which we operate.

### Harassment and discrimination

Abuse or harassment of any kind, including sexual or racial harassment or actions that are intimidating, discriminatory or offensive, whether by employees (at any level) or non-employees and third parties (e.g. customers and suppliers) if occurring in the course and scope of any employee's job, are not tolerated. Our approach to harassment and discrimination is governed by our Global Anti-Harassment & Anti-Discrimination Policy which has been developed in accordance with applicable law.



## Data privacy

KRONOS is committed to comply with applicable laws concerning the privacy of personal data. The Company's cybersecurity program, which includes information technology policies, guidelines and procedures, includes specific measures to protect the integrity, confidentiality, accessibility and availability of personal data.

## Health and safety

KRONOS strives to provide a safe and healthy workplace and to comply with applicable safety and health laws and regulations. Our safety program is governed by our Safety, Environment, Energy, Quality Policy, as well as safety-related guidelines and procedures.

## Freedom of association and collective bargaining

We respect our employees' right to join or form a labor union without fear of reprisal, intimidation, or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. KRONOS is committed to bargaining in good faith with such representatives.

## Supply chain

In order to uphold our commitment to global standards and meet emerging regulatory obligations, we believe it is essential for KRONOS, our suppliers, and our customers to evaluate and mitigate human rights risks throughout the supply chain. If adverse human rights impacts resulting from or caused by our business activities are identified, we are committed to address them fairly and equitably.

To this end, KRONOS has developed and maintains a sustainable procurement program outlined in specific guidelines and procedures, which includes a risk management system as well as risk analysis, training, reporting, and corrective action processes.

In addition, KRONOS has developed a Supplier Code of Conduct ("Supplier Code"), which sets forth requirements for our suppliers related to ethics and integrity, labor and employment practices, protecting human rights, worker safety, environmental protection, and preventing discrimination. Our suppliers are required to either directly sign our Supplier Code and return it to KRONOS or submit their own substantially similar code or policy which is then subject to legal review within our organization.

## Grievance mechanisms

Our employees and any other parties who are negatively impacted by our company's activities or business relationships are given appropriate channels to report concerns or violations related to this Policy. To report a concern or violation, employees may contact any of the following: manager/supervisor, department head, or human resources representative. These employees are responsible for forwarding any information received regarding a concern or violation to the appropriate staff or authority as necessary.

Additionally, in our Code of Business Conduct and Ethics, we have established a worldwide system available to employees and the general public through which possible compliance



violations, including human rights and environment-related risks, can be reported - anonymously, if desired. KRONOS implements a review, verification and, if warranted, a remediation process to address all grievance reports.

A handwritten signature in black ink that reads "Jim M. Buch". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

**Jim M. Buch**  
President and Chief Executive Officer  
August 2023