

# Sustainability Report 2024



4 Tri Harbor Court  
Port Washington, NY 11050  
USA

US: +1 516 627 6000  
Europe: +33 4 72 00 42 20  
Asia: +91 2717 616717

[www.actylis.com](http://www.actylis.com)



Message from our CEO	3
Message from our Chief Sustainability Officer	3
Company in brief	4
1. Company's Identity	
1.1 General information about the company	7
1.2 A history of dynamic growth	7
1.3 Activities, brands, products, and services	8
1.4 Location of operations & markets served	11
1.5 Company's value platform	12
1.6 Significant events in 2024	13
1.7 Company's approach to ESG	13
1.8 Materiality analysis	20
1.9 Risk factors and management approach	21
1.10 Business ethics and compliance	24
2. Governance	
2.1 Board of directors	28
2.2 Management team	28
2.3 Delegation of authority	29
3. Social Aspects	
3.1 Company's workforce	31
3.2 Contribution to local communities	35
4. Environmental Aspects	
4.1 Management approach	37
4.2 Energy consumption	37
4.3 Water	37
4.4 Air	38
4.5 Emissions	38
4.6 Waste	39
5. Information about this report	41
5.1 Methodology	41
5.2 GRI content index	47
5.3 Contact	

As we continue to transform Actylis into a global leader in the manufacturing and sourcing of critical materials and ingredients for the life sciences and advanced technology markets, our commitment to sustainability becomes not only essential, but a powerful driver of long-term impact.

Sustainability is integral to how we operate and how we deliver value. Our approach is grounded in the same principles that define our business: reliability, agility, and security across our global supply network. By streamlining the management of complex raw materials and ingredients, we help our partners reduce waste, optimize resources, and meet evolving environmental and regulatory expectations.

We believe sustainability must benefit everyone - our planet, our people, our customers and suppliers, and our communities. That's why we embed continuous improvement into every aspect of our operations, from responsible sourcing and packaging to reducing our operational footprint and supporting more sustainable manufacturing practices.

This strategy outlines ambitious goals, but it also reflects the culture of ownership and innovation that runs deep across Actylis. I'm confident that our shared commitment will enable us to meet and exceed these targets.

Thank you for being part of the Actylis journey, whether as a customer, a supplier, or a member of our team. Together, we are not only simplifying supply, we're helping to shape a more sustainable future.

**Scott Thomson**  
Chief Executive Officer  
Actylis

Commitment to Sustainability

As the Chief Sustainability Officer of Actylis, I am proud to reaffirm our unwavering commitment to sustainability. At Actylis, we believe that sustainability is not just a goal but a fundamental aspect of our business strategy and operations. Our dedication to sustainable practices is reflected in every facet of our company, from our procurement policies to our environmental initiatives.

We are committed to assessing all strategic suppliers on their environmental and social performance and ensuring that no strategic suppliers operate outside the UN Sustainable Goals initiative by 2028. Our procurement policy includes a sustainability clause in suppliers' contracts with minimum requirements on social and environmental performance. We implement rigorous risk assessments with specific environmental and social standards, depending on country-specific requirements.

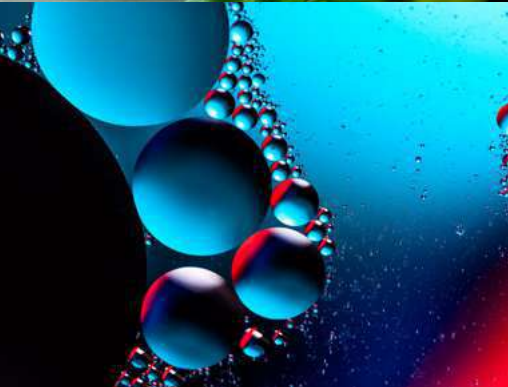
Our internal activities include quarterly management reporting through the ESG Datasheet, annual evaluations by EcoVadis, and the publication of our Sustainability Report in accordance with the GRI standard. We are also dedicated to monitoring our carbon footprint and defining target reductions for Scope 1, 2, and 3 emissions in line with The Paris Agreement. Our reduction strategy includes ambitious short-term, medium-term, and long-term objectives.

We are proud of our achievements, such as our Gold EcoVadis rating for 2 straight years, which places us in the 97th percentile among our peers. This rating is a testament to our commitment to sustainable practices and our dedication to making a positive impact on the environment and society.

As we move forward, we remain committed to our mission of having a positive impact on the environment and society. We will continue to drive sustainability initiatives, collaborate with our partners, and engage our employees in making the world a better place to live. Together, we can achieve a sustainable future.

**Varun Vijay Rao**  
Chief Sustainability Officer  
Actylis





Customers  
4000+



Products  
3000+



Countries  
100+



Global Operating Sites  
15+



Suppliers  
1100+



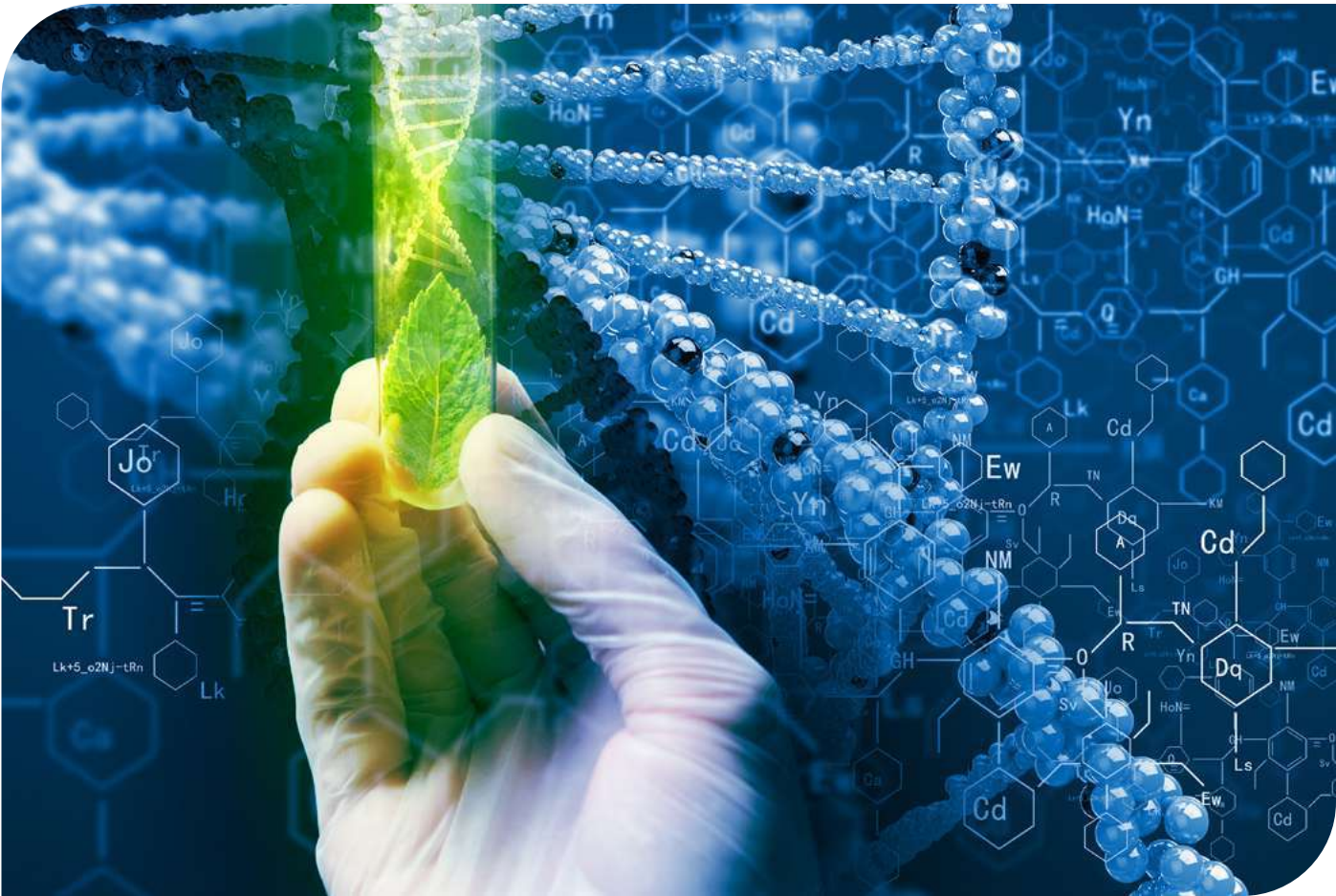
Workers  
700+

Areas of Expertise:

- Analytical Services
- Contract Manufacturing
- Custom Manufacturing
- R&D Services
- Supply Chain Services
- Quality and Regulatory Services

Businesses:

- Life Sciences
  - Pharmaceuticals
  - Biopharmaceutical
  - Agriscience
- Nutrition
- Specialty Chemicals
- Cosmetics



Actylis was started in 1947 and recently became part of New Mountain Capital Group in 2019 and has evolved into a multi-faceted organization encompassing the broad areas of human health, performance chemicals, and pharmaceutical ingredients.

Our global operations include R&D facilities, GMP manufacturing sites, analytical labs, sales offices and sourcing hubs at strategic locations in the US, Canada, Ireland, UK, China, India, France, Germany, the Netherlands and Singapore. We have developed strong relationships with our suppliers and manufacturers over the past 50+ years, allowing us to supply over 3,000+ chemical solutions to our customers. This, in turn, allows them to more rapidly develop and commercialise their innovative products.



# 1 Company Identity

## 1.1 General information about the company

### Name of the organization

Aceto US LLC dba Actylis

### Ownership

Actylis is a portfolio company of New Mountain Capital, a New York-based investment firm specializing in business building and growth. New Mountain Capital manages over \$55 billion in assets across private equity, public equity, and credit funds.

### Location of headquarters

Registered office: Port Washington, New York

Postal address: 4 Tri Harbor Court Port Washington, New York 11050 UNITED STATES

Telephone: +1 516-627-6000

Website: [www.actylis.com](http://www.actylis.com)

## 1.2 A history of dynamic growth

### Milestone years

Actylis was established in September 2022 through the integration of eight specialty manufacturing companies and three sourcing firms, creating a unified entity with enhanced capabilities in sourcing and manufacturing. The companies that formed Actylis include Aceto US LLC & subsidiaries, A&C, A&C Bio Buffer, Cascade Chemistry, Finar, Interactifs, IsleChem, Pharma Waldhof, Syntor Fine Chemicals, Biotron, and Talus.

### 2019 – Strategic Acquisition

- Aceto was acquired by New Mountain Capital, initiating a significant transformation and growth strategy.

### 2021 – Expansion Through Acquisition and Infrastructure

- Commenced construction of a 30,000-square-foot cGMP manufacturing facility in Eugene, Oregon, enhancing capabilities in active pharmaceutical ingredients (APIs).
- Acquired A&C, a manufacturer of GMP-compliant excipients and process solutions, expanding offerings in the vaccine and biopharmaceutical sectors.

### 2022 – Formation of Actylis

- Officially launched as Actylis in September, integrating Aceto and ten acquired companies into a single global brand, reflecting a hybrid model of sourcing and manufacturing expertise.

### 2023 – Operational Growth and Capability Enhancements

- Opened the Eugene cGMP facility, adding advanced manufacturing capabilities.
- Expanded the Montreal site with new Water for Injection (WFI) capabilities and ISO Class 7 cleanroom space to support pharmaceutical manufacturing.
- Achieved Gold EcoVadis Rating, placing Actylis in the 93rd percentile among peers for sustainability practices.

### 2024 – Leadership and Portfolio Expansion

- Appointed Scott Thomson as CEO in June, bringing fresh leadership to guide the company's next phase of growth.
- Acquired Pharm-Rx in October, a supplier of specialty ingredients for the pharmaceutical and nutritional sectors, further broadening the product portfolio.
- Achieved Gold EcoVadis Rating, placing Actylis in the 97th percentile among peers for sustainability practices.



# 1.3 Activities, brands, products, and services

## 1.3.1 Business sectors



### Pharmaceuticals

We offer a robust suite of active pharmaceutical ingredients (APIs), pharmaceutical intermediates (PIs), and excipients supporting a variety of dosage forms:

- o Oral Solid & Semi-Solid Dose (OSD/SSD)
- o Nasal, Ophthalmic, Dermal, and Transdermal formulations

This business segment ensures global compliance, backed by robust regulatory documentation and comprehensive quality assurance.



### Biopharmaceuticals

In the growing biologics sector, Actylis is a trusted partner for high-purity raw materials used in:

- o Biopharma Excipients
- o Cell Culture Media Components
- o Buffers and Process Solutions
- o Amino Acids, Nucleotides, Cofactors, and Vitamins

These products are critical for cell and gene therapy, diagnostics, and bioprocessing applications.



### Nutrition

Actylis delivers scientifically supported ingredients tailored for human nutrition and dietary supplements. Applications include:

- o Bone and Heart Health
- o Digestive and Immune Support
- o Sports Nutrition and General Wellbeing

Product offerings span minerals and chelates, amino acids, botanical extracts, marine and vegetable oils, and vitamins.



### Cosmetics

Our cosmetic ingredients support innovative and clean beauty formulations. Our product categories include:

- o Actives & Botanicals
- o Functionals & Commodities

These are used across skincare, hair care, sun care, oral care, and color cosmetics.



### Specialty Chemicals

We offer a wide spectrum of specialty chemicals tailored to high-performance and industrial applications:

- o Digital Imaging & 3D Printing
- o Adhesives, Coatings & Sealants
- o Electronics, Composites, and Inks
- o Fuel Additives, Metal Treatment, Lubricants
- o Flavors, Fragrances, and Water Treatment

Our capabilities include synthesis and scale-up solutions for novel materials



### Agri Science

In agriculture, we supply sustainable and performance-enhancing crop protection products:

- o Insecticides, Herbicides, and Fungicides
- o Post-harvest Protection

We work with clients to deliver customized solutions that enhance crop yield while promoting environmental stewardship.

## 1.3.2 Services

SERVICE CATEGORY	DESCRIPTION
Analytical Services	Advanced testing and validation to meet global regulatory standards
Custom & Contract Manufacturing	Tailored production across sectors under cGMP and ISO-certified conditions
Research & Development	Contract R&D, process scale-up, and formulation support
Supply Chain Services	End-to-end logistics and inventory optimization
Quality & Regulatory	Documentation, compliance, and audit-readiness across geographies

## 1.3.3 Business Administration

- |   |                                     |
|---|-------------------------------------|
| o Accounting and Finance                      | o Supply Chain and Logistics        |
| o Credit, Risk & Assurance                    | o Sales and Marketing               |
| o Information Technology & Digital            | o Quality and Regulatory Compliance |
| o Human Resources                             | o Environmental Health and Safety   |
| o Strategic Supplier Management (Procurement) | o ESG & Compliance                  |

1.3.4 Business Model

Actylis operates as a global hybrid manufacturer and sourcing specialist, serving regulated industries including pharma, biopharma, agriscience, specialty chemicals, cosmetics, and nutrition.

We offer customized sourcing, flexible manufacturing, and end-to-end services—from supply chain and logistics to quality, regulatory, and analytical support. This integrated model enables us to deliver compliant, reliable, and sustainable solutions tailored to customer needs.

As of 2024, we support

4000+  
Customers

across

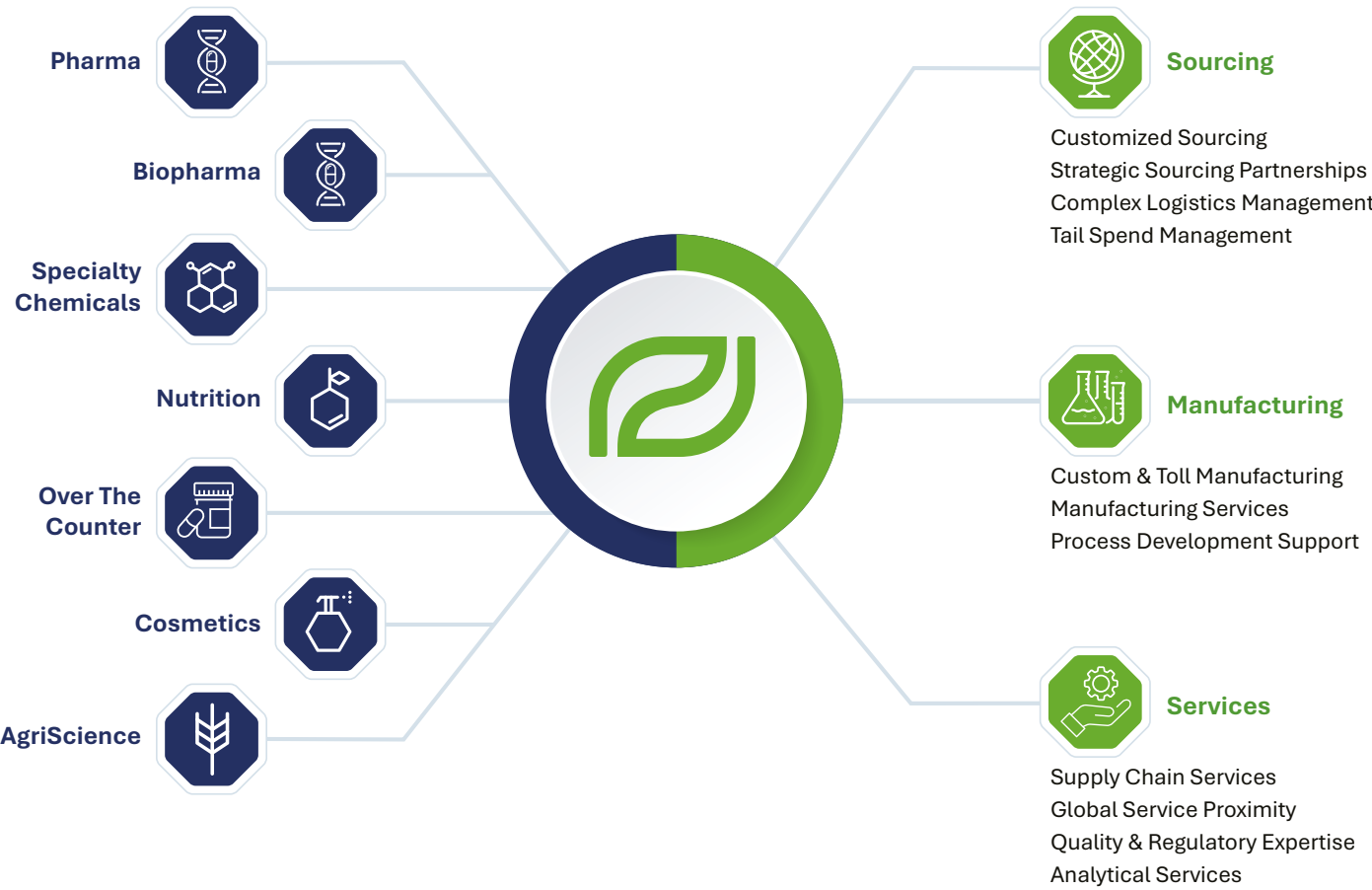
100+  
Countries

operating in

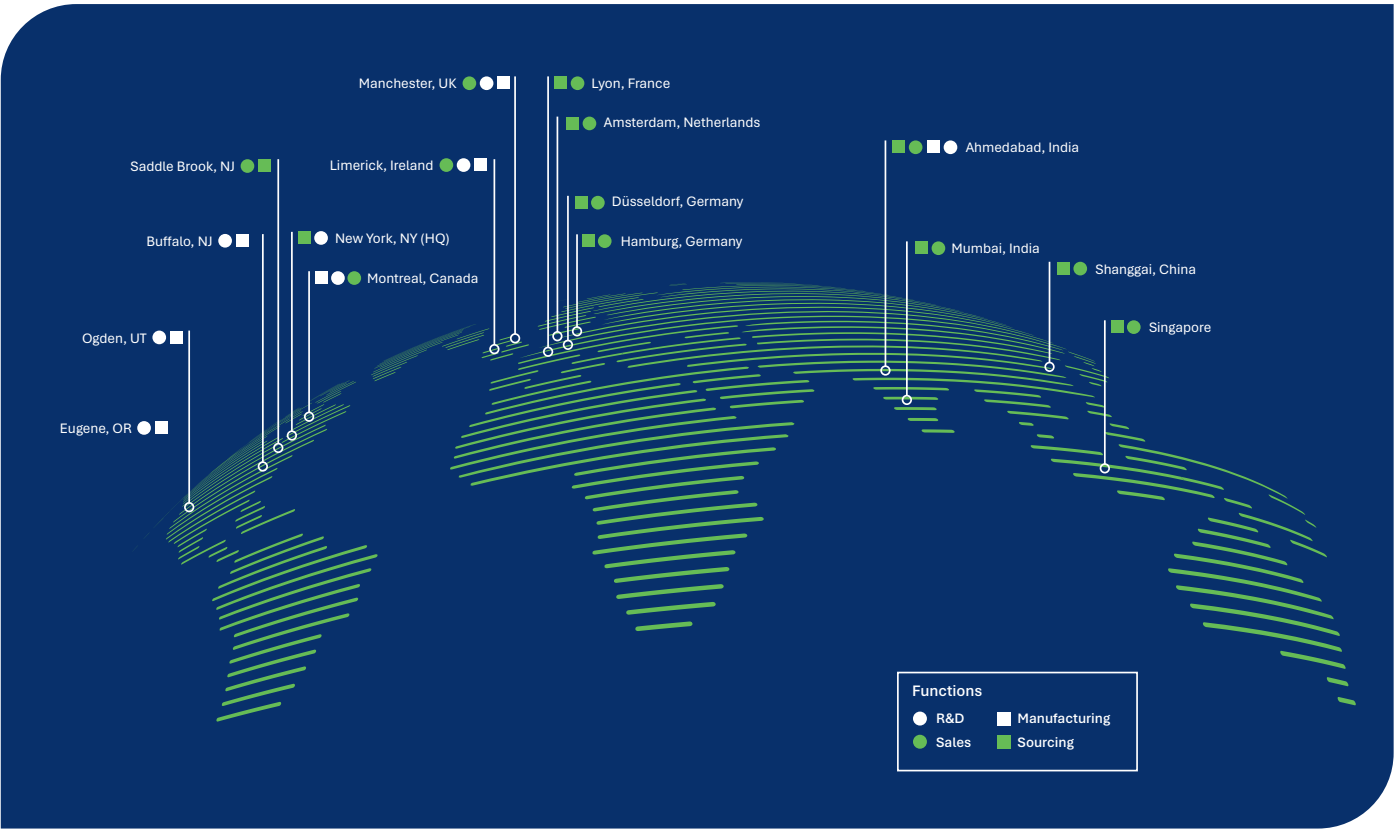
15+  
Global Sites

Including

- cGMP Manufacturing Facilities
- R&D Centers
- Sales and Sourcing Office
- Warehousing & Distribution hubs



1.4 Location of Operations & Markets Served



Global Footprint

Actylis operates a robust global network, strategically positioned to serve diverse markets across the pharmaceutical, biopharmaceutical, nutrition, cosmetics, specialty chemicals, and agriscience sectors. Our presence spans three continents, encompassing manufacturing facilities, R&D centers, sourcing hubs, and sales offices.

North America

- United States:

- Port Washington, New York: Global Head Office
  - Eugene, Oregon: cGMP API Manufacturing Facility
  - Ogden, Utah: Production & Sales Facilities
  - Buffalo, New York: Specialty Chemicals Manufacturing & Analytical Services
- Canada:

- Montreal: Excipient & API GMP Manufacturing with WFI & ISO Class-7 space

Europe

- France:

- Sales Office in Lyon
- Germany:

- Sourcing & Sales Offices in Düsseldorf & Hamburg
- Ireland:

- Liquid GMP Manufacturing Plant in Limerick
- Netherlands:

- Sourcing and Sales Office in Amsterdam
- United Kingdom:

- R&D and PI Manufacturing in Runcorn
- Switzerland:

- Office in Basel

Asia

- India:

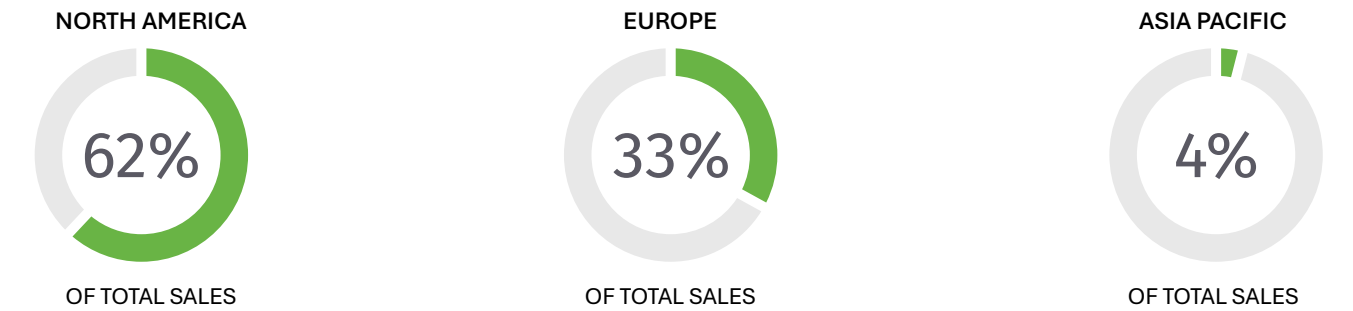
- Ahmedabad: GMP Excipient Manufacturing Plant
  - Mumbai: Sourcing Hub
  - Bangalore: Global IT Support
- China:

- Sourcing Office in Shanghai
- Singapore:

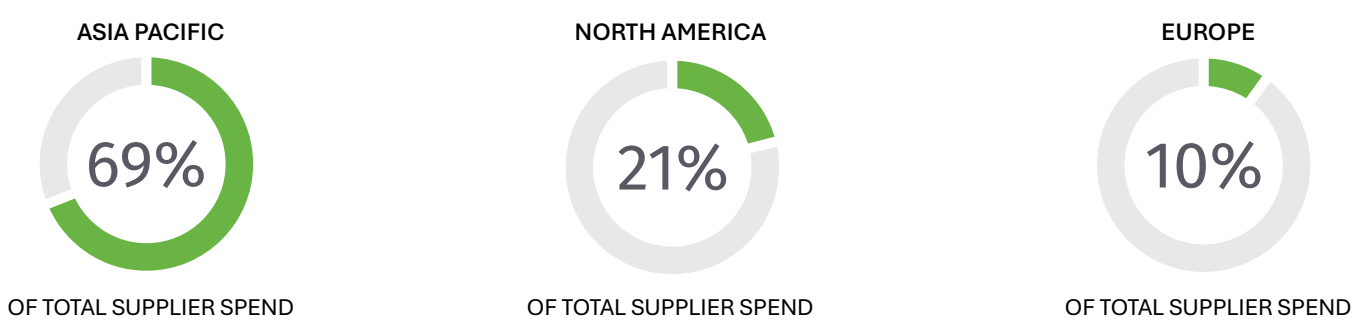
- Sourcing and Sales Office

1.4.2 Markets served

Actylis’ diversified portfolio caters to a global clientele, with a significant presence in:



Actylis’ global sourcing capabilities extend to all regions:



1.5 Company’s Value Platform

**1.5.1 Vision**

To delight our Customers, Stakeholders & Employees by consistently sourcing, manufacturing, and delivering high quality products through Innovation, Research & Development and Global Sourcing capabilities by maintaining Global best practices in Quality Standards and Safety.

**1.5.2 Mission**

Modernize the sourcing and procurement of raw materials utilized in life sciences and industrial applications to reduce errors, remove work, improve delivery, and provide choice that meets customers’ precise needs.

1.5.3 Core Values

**Integrity**

For us, Integrity implies honesty and transparency in our business processes and the highest level of ethical behaviour and professional act in customer services.

**Safety & Well-being**

The safety and well-being of our employees, contractors, partners, and visitors are our top priority. Everyone has both the right and responsibility to work safely. If there is any question about safety, each person is empowered to stop the task immediately until all risks are addressed.

**Commitment**

At Actylis, we are committed to all our stakeholders adopting best practices in business operations to honour our deliverables to every person, entity or organization, associated with us.

**Customer First**

Customer demands for our products and their feedback are driving force for our growth and development. We create long term relationship with customers through value addition in their products and processes. At Actylis, employees treat customers with honesty, respect and dignity.

**Respect for Individual**

We are committed to create a work culture that encourage trust in the organisation, respect for an individual and value the diversity in the organisation.

**Contribute to the Society**

We believe that our responsibility as a member of society is to create value in society through improvement in health care, education and caring for environment.

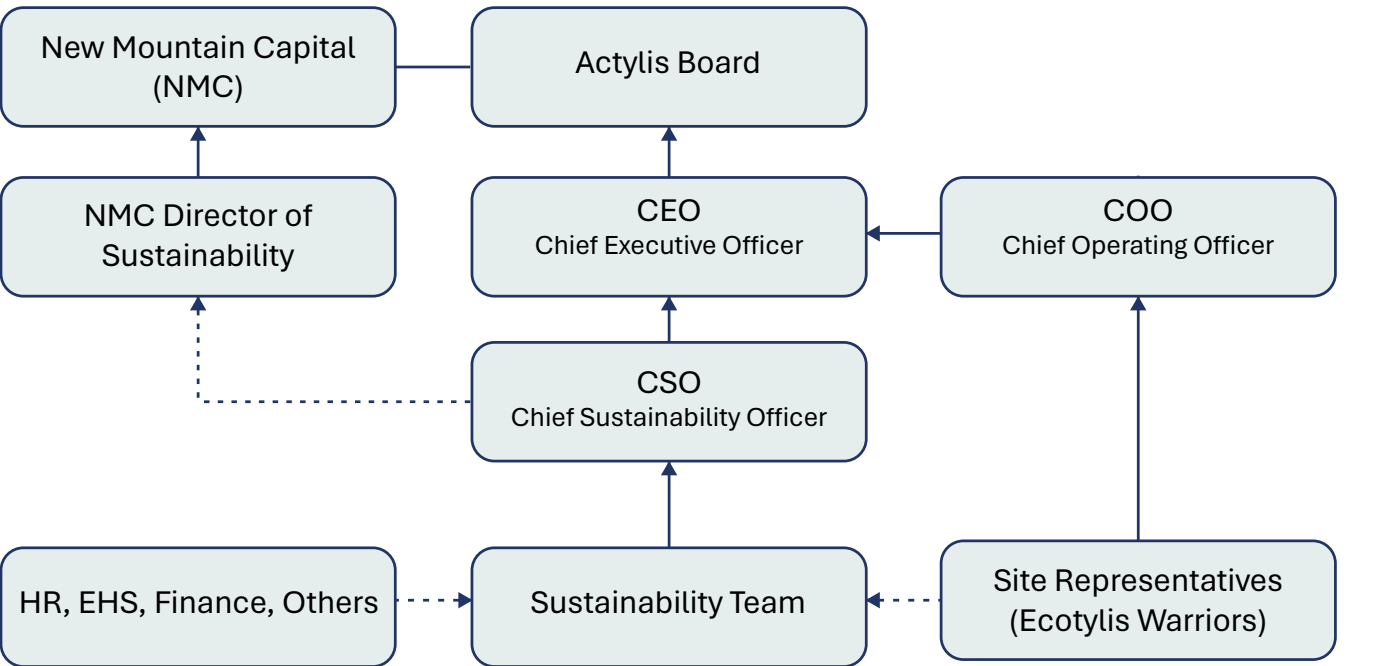
1.6 Significant events in 2024

- ✓ Appointed Scott Thomson as CEO in June, bringing fresh leadership to guide the company’s next phase of growth.
- ✓ Acquired Pharm-Rx in October, a supplier of specialty ingredients for the pharmaceutical and nutritional sectors, further broadening the product portfolio.
- ✓ Achieved Gold EcoVadis Rating, placing Actylis in the 97th percentile among peers for sustainability practices.
- ✓ Commenced SEDEX certification process, marking the initial phase of enhancing ethical supply chain practices and transparency.

1.7 Company’s approach to ESG

1.7.1 ESG & compliance governance

At Actylis, ESG and compliance oversight is led by the Actylis Board, with execution driven by the CEO, CSO & COO. The CSO works closely with the NMC Director of Sustainability and is supported by a cross-functional Sustainability Team and site-level representatives (“Ecotylis Warriors”) as well as other relevant functions such as HR, EHS, Quality etc. This structure ensures that ESG strategy, risks, and actions are embedded across all levels and regularly reported to senior leadership.






1.7.2 ESG Strategy:

Our Sustainability Strategy is focused on three key areas



01

ENSURE ENVIRONMENTAL AND SOCIAL STANDARDS IN OUR SUPPLY CHAIN



02

MONITOR CARBON EMISSIONS AND REDUCE OUR CLIMATE IMPACT



03

CARE FOR OUR PRODUCTS' ENVIRONMENTAL FOOTPRINT

These are supported by three secondary commitments



04

PROTECT AND DEVELOP OUR PEOPLE



05


LIMIT THE IMPACT ON THE ENVIRONMENT OF OUR FACILITIES





06

WORK ETHICALLY

Three Key Areas:

- 


**Supply Chain**
  - Ensure environmental and social standards in our supply chain
  - By the end of 2025, review the environmental practices of all key suppliers
  - By 2028, all key suppliers must operate above an acceptable level of sustainability performance
- 


**Carbon Emissions**
  - Monitor carbon emissions and reduce our climate impact
  - By 2035, reduce scope 1&2 combined emissions by 60% from base year 2024 in line with the Paris agreement
- 

**Products**
  - Care for our products' environmental footprint
  - By 2025, map the environmental impact of our core product & packaging portfolio
  - By the end of 2026, perform a Life Cycle Assessment on our core product range
  - Adhere to, and exceed where possible, product regulations and customer expectations

Supported by Three Secondary Commitments:

- 

**People: Protect and Develop**
  - Protect and develop our people
  - By 2026, harmonize a social standard for all employees globally
  - By the end of 2026, ensure all employees are educated in the importance of diversity & non-discrimination
  - Offer flexible working arrangements to all employees where appropriate
- 

**Facilities**
  - Limit the environmental impact of our facilities
  - Monitor waste management and spill prevention control in line with local regulations
  - Ensure that highest levels of occupational safety standards are implemented at all locations
- 

**Ethics**
  - Work ethically
  - Put a minimum of 95% of relevant employees through anti-corruption and anti-bribery training every year
  - Ensure all new suppliers adhere to the company's ethical standards

1.7.3 Supporting international guidelines and standards

At Actylis, we believe that strong governance and ethical conduct are fundamental to building a resilient and responsible business. Our operations span across multiple geographies and industries, and with that comes a responsibility to align with internationally accepted standards that promote human rights, labour fairness, environmental protection, and anti-corruption.

To guide our sustainability efforts and business practices, Actylis supports and strives to align with the following internationally recognized frameworks:

United Nations Global Compact (UNGC)

We support the ten principles of the UN Global Compact, which addresses human rights, labour standards, environmental protection, and anti-corruption. These principles serve as the foundation of our ESG framework and guide our decision-making across all business functions.

International Human Rights Frameworks

Actylis respects and promotes internationally proclaimed human rights and integrates the following key instruments into our policies and practices:

- The International Bill of Human Rights
- The United Nations Guiding Principles on Business and Human Rights (UNGPs)
- The Eight Core Conventions of the International Labour Organization (ILO), including the elimination of forced and child labour, non-discrimination in employment, and freedom of association
- Article 32 of the UN Convention on the Rights of the Child, advocating for the protection of children from economic exploitation

OECD Guidelines for Multinational Enterprises

These guidelines inform our approach to responsible business conduct, promoting transparency, environmental responsibility, consumer interests, and due diligence across our global supply chains.

OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions

We maintain a zero-tolerance approach to bribery and corruption and actively promote ethical business conduct across all levels of our organization.

These global standards are integral to our ESG journey, helping us build a culture of integrity and responsibility. They also support our ongoing efforts to meet the expectations of customers, regulators, investors, and society at large.





1.7.4 Contribution to the UNSDGs



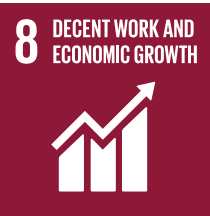
SDG 5: Gender Equality

We are committed to building a workplace that fosters diversity, inclusion, and equal employment opportunities. Our policies emphasize gender equality in recruitment, leadership development, and workplace culture, and we continue to take steps to empower all employees regardless of gender.



SDG 7: Affordable and Clean Energy

Actylis is implementing measures to improve energy efficiency across its operations and reduce reliance on non-renewable sources. Our facilities such as Ahmedabad, Montreal, and Eugene sites integrate modern, energy-efficient systems, and we continuously evaluate opportunities to reduce our environmental impact through cleaner energy alternatives.



SDG 8: Decent Work and Economic Growth

We promote safe, fair, and dignified working conditions across our global operations and supply chain. By investing in workforce development, upholding labor rights, and promoting a culture of continuous improvement, Actylis fosters long-term, inclusive economic growth.



SDG 12: Responsible Consumption and Production

Sustainable procurement, waste reduction, and product stewardship are central to our ESG commitments. Through supplier audits, product traceability, and life cycle thinking, we aim to ensure that raw materials and products are sourced and manufactured responsibly, with a strong focus on regulatory compliance and sustainable design.



SDG 13: Climate Action

As part of our broader climate strategy, Actylis monitors and seeks to reduce greenhouse gas emissions across operations. Our achievement of the EcoVadis Gold Rating reflects our commitment to proactive climate action and environmental management.



SDG 16: Peace, Justice, and Strong Institutions

Ethical conduct and compliance are foundational to our governance structure. We maintain strict anti-corruption practices, a whistleblower protection mechanism, and robust internal controls to ensure transparency and accountability across all business dealings.



SDG 17: Partnerships for the Goals

Actylis believes in the power of collaboration. We work closely with customers, suppliers, NGOs, and industry peers to build sustainable supply chains, share best practices, and drive collective progress toward the SDGs.



1.7.5 Membership of associations

Actylis is committed to collaborating with industry peers, regulatory bodies, and non-profit organizations to promote responsible business practices, sustainability, and innovation. Our active membership in leading industry associations helps us stay aligned with evolving standards, share knowledge, and contribute to shaping a more sustainable future. We are proud members of the following organizations:



RSPO (Roundtable on Sustainable Palm Oil)

Supporting the development and use of sustainable palm oil through responsible sourcing and supply chain transparency.



SOCMA (Society of Chemical Manufacturers and Affiliates)

Engaging in advocacy, education, and best practices within the specialty chemical industry to enhance operational excellence and compliance.



REACH

REACH regulations, primarily the EU’s REACH regulation, aim to protect human health and the environment from the risks posed by chemicals by better identifying and managing those risks. This is achieved through registration, evaluation, authorization, and restriction of chemical substances.



ECOVADIS

In addition to our certifications, Actylis’ ESG performance is independently assessed by EcoVadis. In 2024, Actylis was awarded a Gold Medal, ranking in the 97th percentile with a score of 78.

ECOVADIS SCORES	2022	2023	2024
Overall Score	52/100	70/100	78/100
Performance	57th Percentile	93rd Percentile	97th Percentile
Medal	Bronze Medal	Gold Medal	Gold Medal



CDP (Carbon Disclosure Project)

In 2024 Actylis has a Water Security score of B- and a Climate Change score of C, as assessed by the CDP, a non-profit organization that promotes environmental transparency, focusing on climate change, water security, and deforestation.



1.7.6 ESG stakeholders

1.7.6.1 Mapping main ESG stakeholders

1. Customers

Our customers, across pharmaceutical, biopharmaceutical, nutrition, cosmetics, specialty chemicals, and agriscience sectors, are increasingly focused on sustainable sourcing, regulatory compliance, and ethical business practices. We engage regularly to align on ESG expectations, and supply chain transparency.

2. Suppliers & Business Partners

We collaborate with a global network of manufacturers and partners to ensure that ESG principles are embedded throughout our supply chain. This includes supplier assessments, sustainability audits, and long-term relationship building based on shared value.

3. Financial Institutions

We maintain transparent communication with financial stakeholders, including investors and private equity owners, such as New Mountain Capital. We report on ESG performance, risk management, and compliance, contributing to long-term value creation.

4. Employees

Our people are at the heart of our operations. Through internal communication, training programs, engagement surveys, and development initiatives, we foster a workplace culture that emphasizes safety, inclusion, and shared responsibility for ESG goals.

5. Governance, Regulatory & State Authorities

We adhere to all applicable laws and regulations across jurisdictions. We also engage with government bodies, industry regulators, and standard-setting organizations to ensure ethical governance and proactive compliance in areas such as environmental standards, labour practices, and anti-corruption.

1.7.6.2 Management of the supply chain

Supplier Performance Management (SPM)

Overall supply chain and the supplier performance is a mission critical element in the business operations at Actylis. In 2024, Actylis sourced products from over 40 countries and 1100+ suppliers. To manage at this scale, Actylis has a robust Supplier Performance Management (SPM) program in place, that helps in identifying key long-term supplier partners and improving overall supply chain performance.

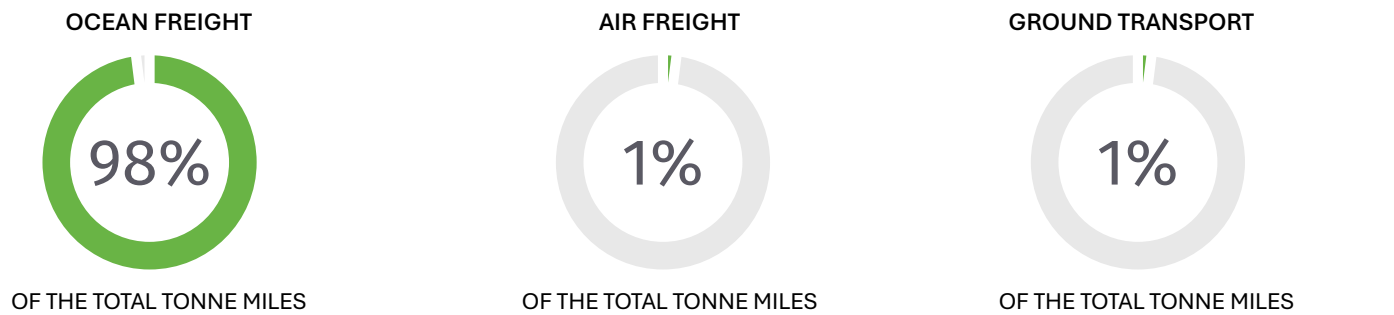
This SPM was institutionalized in 2021 and has a score card along with review questionnaire that includes general performance areas in global chemicals supply industry. Score card includes 6 level1 scoring parameters and 15 level2 categories around cost, quality, logistics, service level, risk, and innovation. Based on the scorecard, suppliers are categorized as Gold, Silver, Bronze, and Exit. This provides a clear understanding of the supplier landscape with its impact on the company’s supply chain.



Supply Chain Sustainability Management

Actylis in 2023, also started evaluating its top suppliers on their sustainability practices. As a part of this process, as of 2024, over 100 top suppliers have signed the supply agreement that has sustainability clauses included in it. Also, over 500 suppliers have signed the supplier code of conduct (responsible procurement charter).

In addition, Actylis conducted a robust supplier assessment process that included questionnaire-based evaluation followed by a supplier site audit. Over 100 top suppliers were assessed through this process and risk profile developed that would lead to supplier education to enhance their sustainability practices towards decarbonization. Of the top suppliers assessed, over 68% had environmental certification (ISO14001 or equivalent) while near 50% had social certification (ISO45001 or equivalent).



As evident from the scale of distribution business, Actylis’ movement of goods from different parts of the world has significant impact on the environmental sustainability. At Actylis, the transportation of goods is tightly and efficiently managed in order to minimize any adverse impact to the planet. Over 98% of total ton-miles movement is done through ocean freight, the least polluting mode of transportation. Actylis works with major shipping lines that are committed to reducing their GHG emissions.





1.8 Materiality analysis

Actylis’ sustainability strategy has been built on key environmental, social, and societal topics that we identified through extensive research and engagement with our employees, suppliers, and customers. Our stakeholders have helped us identify the most substantive topics for us to address, which have been categorized under five core areas of focus. Materiality is a core principle that guides our sustainability reporting by identifying which environmental, social, and governance (ESG) topics are most relevant to Actylis and our stakeholders. In determining these priorities, we considered both internal and external factors that shape our impact and long-term success.

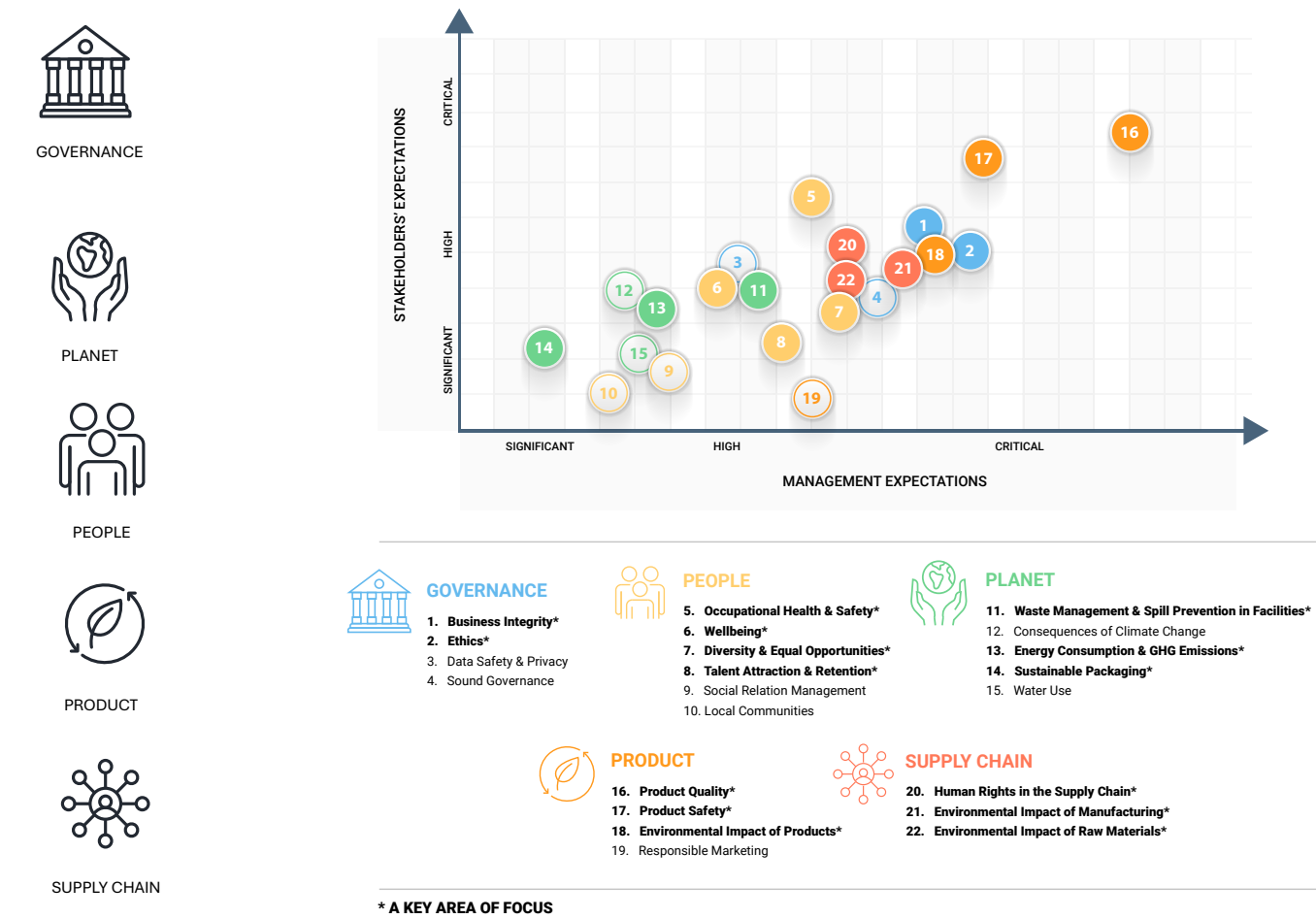
Internal Factors

Internal factors include our core values, business strategy, code of conduct, risk management systems, and existing quality, environmental, health and safety, and compliance frameworks.

External Factors

External factors include applicable legal requirements, the Global Reporting Initiative (GRI) Standards, stakeholder expectations gathered through direct engagement, ESG rating agency frameworks, and issues emphasized by regulatory and financial partners.

Our 2024 materiality matrix outlines the ESG issues that are currently most important to Actylis and their potential impact on our operations and reputation. This process forms the foundation of our sustainability strategy and disclosure priorities.



Actylis follows a structured three-phase process to identify and prioritize material sustainability topics. First, we assess key challenges through peer benchmarking, regulatory reviews, and stakeholder input. These are rated and validated by leadership to create a materiality matrix. Next, we evaluate the maturity of our actions, benchmark against peers, and define short- and long-term objectives with KPIs. Finally, we develop a communication plan to share our strategy with stakeholders and engage employees.

1.9 Risk factors and management approach

1.9.1. Process of managing risks

Actylis follows a structured and proactive approach to risk management to protect its operations, stakeholders, and long-term business continuity. The process is built around four key stages:

1. Identification & Assessment

Risk identification and assessment are conducted at both the corporate and site levels. Business units and functional teams assess risks relevant to their operations, supported by corporate risk management functions as needed.

3. Implementation

Each department or functional team is accountable for implementing approved mitigation measures, with support from corporate teams to ensure consistency and effectiveness.

2. Internal Reporting

- High-priority risks are escalated regularly to:
- The Global Leadership Team, which validates mitigation strategies
  - The Board of Directors or relevant board committees for oversight

4. Continuous Improvement

Risk mitigation efforts are regularly reviewed to identify improvement opportunities and strengthen resilience against emerging threats.

1.9.2. Uncertain global economic environment

RISK CATEGORY	DESCRIPTION & ACTYLIS' MANAGEMENT APPROACH
Regulatory (Current)	<p>Actylis operates in a highly regulated environment, especially in pharma and life sciences. Regulations such as the EU Plastic Tax (e.g., Spain, Italy, UK, Q1 2023) require us to track non-recyclable plastics per shipment. We work closely with suppliers to ensure compliance.</p> <p>Compliance with the UK Modern Slavery Act by reinforcing supplier due diligence and promoting ethical labour practices across its global supply chain.</p>
Regulatory (Emerging)	<p>Policies like the EU maritime transport emissions reduction mandate (2025–2050) may raise future shipping costs. Actylis is proactively monitoring these regulations to mitigate cost and carbon risks.</p> <p>CBAM will become compulsory in 2026, requiring compliance with carbon reporting and payment obligations, with penalties imposed on Actylis if not adhered to.</p>
Technological	<p>We invest in energy-efficient technologies, green chemistry, and digital transformation. In 2024, 40% of our electricity came from renewable sources; we aim to reach 50% by 2026. We also encourage top suppliers to decarbonize.</p>
Legal & Compliance	<p>We are exposed to regulatory risks across formulation, labelling, storage, and safety. Global operations require rigorous monitoring of changing legal landscapes. Cross-functional teams ensure compliance with REACH, FDA, GMP, and other international mandates.</p>
Market	<p>Climate-related disruptions impact raw material availability. For instance, warming oceans are reducing fish oil supply, affecting our nutraceutical offerings. Similarly, many nutraceutical ingredients come from plants and herbs, which are vulnerable to climate shifts. Changes in temperature, rainfall, and soil conditions can reduce crop yields and alter the potency of active compounds. We diversify sources and use analytics to anticipate and mitigate disruptions.</p>
Reputational	<p>Multinational customers expect ESG alignment. Failure to meet these expectations risks contract losses. We maintain EcoVadis Gold (97th percentile) and ensure supply chain compliance with our Code of Conduct.</p>
Acute Physical	<p>Natural disasters such as the recent southern California wildfires or 2023 tornados in the US mid-west or the Panama Canal drought that began in late 2022 and by January 2024 was described as the worst in the canal's history, disrupt operations and logistics. We build redundancy into supply chains and ensure emergency preparedness at site-level.</p>
Chronic Physical	<p>Long-term climate trends and fossil fuel restrictions affect raw materials. For example, crude derivatives used in specialty chemicals may face future limitations. We are exploring bio-based and circular alternatives.</p>



1.9.3 Cybersecurity

Company policies and procedures are in place to secure the network to prevent any breaches via hacking. In addition to the policies and procedures, it is also the Company policy to perform periodic PEN tests to ensure the safety and soundness of the network infrastructure.

IT or facility team ensures that employees have received role-based cyber security training applicable to their responsibilities on a regular basis before obtaining access to the critical cyber systems. All the employees are expected to complete the training before the due date.

Any employee who becomes aware of any violation or suspected violation of this policy must inform the VP, Global IT Operations, the Actylis IT department or the local General Manager (for foreign entities).

1.9.4 Ability to attract and retain talents

The continued success of Actylis is fundamentally reliant on the deep expertise and specialized knowledge of our workforce across distribution business, manufacturing, and supply chain services. Our ability to attract, retain, and continuously develop highly skilled employees and leaders is essential to maintaining operational excellence, driving sustainable growth, and achieving our strategic objectives. A failure to effectively manage talent acquisition, retention, or skills development could adversely affect Actylis’ operations, revenue, and overall business performance.

Management Approach

Actylis implements a structured approach to succession planning, leadership development, and talent management. Through formal Development & Goals discussions, we identify and support individual career growth opportunities aligned with our operational needs. We are committed to promoting employee well-being and maintaining high levels of engagement through regular feedback initiatives, including employee opinion surveys, to cultivate a resilient, motivated, and future-ready workforce.

1.9.5 Complex regulatory and compliance environment

Risks and Opportunities

Actylis operates within a highly regulated global environment encompassing the pharmaceutical, life sciences, cosmetics, nutrition, and specialty chemical sectors. Each of these industries is subject to a complex, evolving landscape of local, regional, and international regulations, including Good Manufacturing Practices (GMP), chemical registration frameworks such as REACH, product safety laws (e.g. Material Safety Data Sheet), and regulatory requirements from agencies such as the FDA. Additionally, we must ensure compliance with environmental, health and safety (EHS), labor, trade, and anti-bribery laws across key jurisdictions including the U.S., European Union, China, and other global markets. Emerging regulatory frameworks—such as plastic taxation initiatives in Europe, carbon emissions regulations for shipping, and evolving raw material certification standards (e.g., organic, Halal, Kosher)—create both challenges and strategic opportunities for Actylis. These include:

- Increased operational costs associated with heightened compliance demands,
- Potential supply chain disruptions during regulatory transitions,
- Reputational risks if suppliers or manufacturing sites fail to meet required standards,
- Opportunities to strengthen Actylis’ market position through leadership in transparent, sustainable, and compliant business practices.

Failure to maintain compliance could result in regulatory investigations, financial penalties, or reputational harm, particularly given the expectations of our multinational customer base for full ESG alignment across supply chains. Actylis’ proactive approach to regulatory changes enables us to manage risks effectively while also positioning ourselves as a trusted, responsible partner.

Management Approach

Actylis is committed to upholding the highest standards of regulatory compliance through a proactive and structured framework:

- **Certified Quality Systems:**  
All relevant Actylis sites operate under ISO 9001:2015 certification and comply with Good Manufacturing Practice (GMP) and Global Supply Chain best practices & guidelines, ensuring the integrity of our manufacturing and distribution processes.
- **In-house Regulatory Expertise:**  
Our global regulatory team, with over 70+ years of collective experience, provides deep expertise across international frameworks, including FDA, EMA, REACH, EPA/TSCA, OSHA, and CSAR regulations.
- **Business Unit-Specific Compliance:**  
Each Actylis facility operates under rigorous, sector-specific standards. For example, our Ogden site complies with NSF/GMP requirements, while our Buffalo site specializes in ISO-certified phosphate esters production.
- **Supply Chain Transparency:**  
We maintain robust supplier management through audits, sustainability declarations, and quality agreements to ensure full traceability and compliance throughout the supply chain.
- **Continuous Improvement and Risk Mitigation:**  
Actylis actively monitors emerging regulatory trends—such as climate-related shipping regulations—and implements adaptive measures, including buffer inventory strategies, secondary sourcing, and strategic collaboration with customers and suppliers.
- **Code of Conduct and Training:**  
We are enhancing our Code of Conduct and Compliance Framework, introducing expanded training programs and mechanisms for reporting concerns, to reinforce a culture of ethical and compliant business practices across our operations.





# 1.10 Business ethics and compliance

## 1.10.1 Ethics and compliance risk assessment

In 2023, Actylis conducted a structured ethics and compliance risk assessment (corruption risk) in order to strengthen our proactive approach to identifying and managing potential corruption risks across our global operations and supply chain. This initiative builds on our commitment to maintaining the highest standards in ethics, product safety, regulatory compliance, and responsible sourcing—especially as regulatory demands and stakeholder expectations continue to grow. The assessment covered global operations including customers and suppliers’ geographies. The assessment was conducted using guidelines established by leading global anti-corruption coalitions including - Transparency International ([www.transparency.org](http://www.transparency.org)) and United Nations Global Compact ([www.unglobalcompact.org](http://www.unglobalcompact.org)).

### Assessment Scope and Process

Our risk review process includes:

#### Internal Compliance Risk Survey

- The assessment was done through an internal questionnaire-based survey distributed across departments and covered –
- Overall risk including policies, procedures, controls, and management oversight
  - Country specific risk including geographies of own operations, customers, and suppliers
  - Anti-corruption policy
  - Anti-corruption training program
  - GHE (Gifts, Hospitality, and Entertainment) transactions and tracking

#### Code of Conduct Integration

Risk awareness modules were embedded in Actylis’ Code of Conduct training, emphasizing issues such as corruption, fair competition, and responsible engagements.

#### Data & Incident Review

Whistleblower reports and audit results were analysed monthly to identify recurring themes or emerging concerns requiring focused attention. There were zero incidents identified, and the risk appeared to be low-to-medium with a reasonably strong controls mechanism in place spanning policies, procedures, internal & external controls, and management & board oversight.



## 1.10.2 Ethics and compliance framework

At Actylis, ethics and integrity are at the core of how we conduct business. Our Code of Conduct establishes clear expectations for responsible behaviour across the organization and serves as a foundation for maintaining trust with all our stakeholders.

The Code of Conduct is designed to:

- Promote honest, ethical, and fair business practice
- Encourage early reporting of concerns or potential violations through confidential, accessible channels
- Foster individual accountability at all levels of the organization
- Protect Actylis’ business interests, assets, and sensitive information
- Deter misconduct and strengthen a culture of compliance and integrity

The Code is reinforced by detailed policies and directives covering critical areas such as:

- Anti-bribery and anti-corruption practices
- Data privacy and cybersecurity
- Conflict of interest and trade compliance
- Whistleblower protections and procedures

### Approval and Oversight

- The Code of Conduct and associated policies are reviewed and approved by the Board of Directors and Management Team
- Functional leaders are responsible for communicating, training, and implementing the Code across all business operations

## 1.10.3 Ethics and compliance training and communication

At Actylis, maintaining a strong culture of ethics and regulatory compliance is a fundamental priority. To support this, all relevant employees are required to complete mandatory Ethics and Compliance training on an annual basis. This training is essential for employees in key operational and functional areas, including Sales, Procurement, Logistics, Quality, EHS and Finance.

### Training and Communication Oversight:

- Completion rates are systematically tracked and reviewed through internal management reporting structures.
- Actylis discloses training completion metrics publicly through our ESG Data Sheet, reinforcing our commitment to transparency, continuous improvement, and accountability to stakeholders.





#### 1.10.4 Monitoring activities

- Global anti-corruption policy, business code of conduct, and procedures
- Anti-corruption training for employees globally in key risk functions
- Global whistleblower hotline with monthly reporting
- Annual anti-corruption audits
- Overall risk including policies, procedures, controls, and management oversight
- Country specific risk including geographies of own operations, customers, and suppliers
- Anti-corruption policy
- GHE (Gifts, Hospitality, and Entertainment) transactions and tracking

#### 1.10.5 Whistleblowing mechanism

At Actylis, we foster a transparent, speak-up culture where employees are empowered to raise concerns in good faith - without fear of retaliation. Our global whistleblowing channels are confidential, easily accessible, and closely monitored. Reports are assessed and investigated by Compliance or HR teams, with senior leadership overseeing the process to ensure alignment with legal standards and stakeholder expectations.

- Our Ethics & Compliance Framework is designed to:
  - Promote honest, ethical conduct and resolve conflicts of interest
  - Encourage early identification of ethical concerns
  - Enable timely internal reporting of suspected violations
  - Protect confidential business information
  - Deter misconduct and uphold personal accountability

## 2 | Governance





2.1 Board of Directors

The Actylis Board of Directors provides strategic oversight and ensures accountability across financial, operational, and sustainability matters. It works closely with the executive team to guide long-term goals, monitor business risks, and uphold ethical standards.

Key responsibilities include appointing executive leadership, reviewing financials, overseeing ESG initiatives, and ensuring compliance in regulated markets. Conflicts of interest are managed through formal disclosure processes. Board members are selected for their diverse expertise in pharmaceuticals, life sciences, and global supply chains, supporting Actylis’ mission of sustainable and responsible growth.

ACTYLIS BOARD OF DIRECTORS				
MEMBER	NATIONALITY	GENDER	ROLE	EXPERIENCE SUMMARY
Rakesh Sachdev	USA	♂	Chairman of the Board	Former CEO of Platform Specialty Products and Sigma-Aldrich. Brings decades of executive experience in specialty chemicals, M&A, and global operations. Also serves on boards of Edgewell and Axalta.
Salvatore Guccione	USA	♂	Board Member	Executive Advisor to New Mountain Capital. Former President & CEO of Actylis (Aceto). Offers over 30 years of leadership in strategic planning, M&A, and executive finance across pharma and chemicals.
Lori Koch	USA	♀	Board Member	CEO of DuPont and former CFO. Expert in corporate finance, strategic transformation, and driving profitability in complex global organizations.
Chris O’Connell	USA	♂	Board Member	Former CEO of Waters Corporation and executive at Medtronic. Brings deep operational, commercial, and innovation leadership across life sciences and medical technology.
Frank Bergonzi	USA	♂	Board Member	Former CEO of Azelis Americas and KODA Distribution. Over 34 years of experience in specialty chemical distribution, with strong credentials in M&A and operational leadership.
Charles Kummeth	USA	♂	Board Member	President & CEO of Bio-Techne. Previously held senior roles at Thermo Fisher and 3M. Brings a proven track record in scaling life sciences companies and driving global growth.

2.2 Management Team

ACTYLIS MANAGEMENT TEAM				
MEMBER	NATIONALITY	GENDER	ROLE	EXPERIENCE SUMMARY
Scott Thomson	USA	♂	Chief Executive Officer	Appointed in June 2024. Brings over 30 years of leadership experience in the pharmaceutical and chemical industries, including roles at SPI Pharma and BASF. Holds an MBA from NYU Stern School of Business and a B.S. in Chemical Engineering from Rensselaer Polytechnic Institute.
Eric Gaertner	Germany	♂	Chief Operating Officer	Oversees global manufacturing, supply chain, EHS, IT, and regulatory functions. Known for leading large-scale operational transformations at companies like Beckers Group, Meyle AG, and Evonik. Holds degrees in Electrical Engineering and Business Administration from Technical University Darmstadt.

ACTYLIS MANAGEMENT TEAM				
MEMBER	NATIONALITY	GENDER	ROLE	EXPERIENCE SUMMARY
Tim Curtl	USA	♂	SVP, Business Analytics & Acquisitions	Joined Actylis in June 2021. Leads M&A and strategic analytics. Previously spent nearly 10 years at Morgan Stanley in Investment Banking and was part of the corporate development team at Eastman Chemical. Holds an MBA in Finance and Strategy from the University of Iowa and a BA from Cornell College.
Lauren Seufert	USA	♀	Chief Strategy Officer	Joined in September 2024. Brings a global business background in specialty and industrial chemicals, with experience at BASF, Nalco, and Ashland. Also founded her own international consultancy. Holds an MBA from Seton Hall University and a B.S. in Chemical Engineering from the University of Virginia.
Keith Wilkinson	USA	♂	President, Specialty Chemicals	Joined Actylis in 1990. Leads Specialty Chemicals business globally. Has been instrumental in Actylis’ strategic push in the specialty chemical arena in Europe since 2010. Graduated with a bachelor’s degree in chemistry from the University of Delaware.
Damien O’Rourke	Canada	♂	President, Global Pharma and Ag Life Sciences	Joined Actylis in April 2021 through the acquisition of A&C. Appointed President in January 2022. Brings over a decade of leadership in GMP manufacturing and excipient innovation. Holds a degree in Marine & Plant Engineering from CIT (MTU) and completed the Executive Development Course at McGill Executive Institute.
Mark Bostel	USA	♂	President, Global Nutrition & OTC	Joined Actylis in 2024 through the acquisition of Pharm-Rx. Brings deep experience in the Dietary Supplement and Fine Chemical industries. Holds a bachelor’s degree with majors in International Finance, Marketing, and Accounting from the University of Miami and pursued a master’s in financial accountancy from Rutgers University.
Sunil Punjabi	India	♂	President, Asia Pacific	Joined in February 2022. Responsible for expanding Actylis’ sales presence in the Asia Pacific region. Previously held leadership roles at Merck KGaA and Sigma Aldrich in Asia.
Varun Vijay Rao	USA	♂	Chief Supplier Management Officer & Chief Sustainability Officer	Joined in November 2020. Oversees Actylis’ supplier management organization, including sourcing offices in India and China. Background in Engineering, Marketing, Strategy, Procurement, Sales, and General Business Management. Holds a BS in Mathematics & Physics from Elon University and a master’s in mechanical engineering from North Carolina State University.
John Elliot Simpkins	USA	♂	Chief Human Resources Officer	Joined in August 2019. Brings over 25 years of executive Human Resources experience. Previously served as Executive Vice President and CHRO at Drive Medical and held various HR leadership roles at Henry Schein, Inc. Holds degrees in Political Science and Communications from St. John’s University and is SHRM-SCP certified.
James Steele	USA	♂	Chief Financial Officer	Joined in January 2020. Brings over 30 years of strategic financial execution and global finance experience. Previously held key executive financial roles at Sigma Aldrich/Merck KGaA and was Director of Corporate/International Finance at Worldwide Technology. Holds a BSBA in Accounting from the University of Missouri-St. Louis and is a CPA.

2.3 Delegation of Authority

Actylis maintains formal delegations of authority to ensure clear accountability, effective risk management, and strong internal controls that help prevent fraud and errors.

# 3 | Social Aspects



## 3.1 Company's workforce

### 3.1.1 Management approach

We consider our people our most important asset - they are what make Actylis what it is. We are committed to their security and safety and will implement a number of initiatives that will target the social, mental, societal and developmental aspects of their wellbeing.

### 3.1.2. General Information: Workforce data



728

Individuals were employed by Actylis in the year 2023 and 2024



**Women represented 35.6%** of the employees in 2024 (vs. 34.1% percent in 2023).

**Women represented 26% percent of the managers and 38% percent of the non-managers** in 2024 (vs. respectively 26% percent and 37% percent respectively in 2023).

EMPLOYEES	2023	2024
Men	480	469
Women	248	259
Total	728	728

EMPLOYEES BY CATEGORY	2023	2024
Manager	139	147
Non-Manager	589	581
Total	728	728

EMPLOYEE (PERMANENT) TURNOVER 2024 (%)	2023	2024
Total Turnover Rate	21.7%	22.3%
<b>Turnover by Gender</b>		
Male	16.3%	16.1%
Female	5.4%	6.2%
<b>Turnover by Region</b>		
North America	9.5%	10.9%
Europe	3.4%	3.2%
Asia	8.8%	8.2%



3.1.3. Training and performance

One of the fundamental aspects of talent management within Actylis is training. The e-learning platforms, plays a key role in supporting employees’ professional development.

TRAININGS	2023	2024
Employee Training on Anti-Corruption (% Complete)	95%	95%
Employee Training on Cyber Security (% Complete)	94%	95%
Career development program (Avg. hours of training per employee)	70.83	na*

\* Data not available due to change in measurement system.

Programs for upgrading employee:

At Actylis, we are committed to building a culture of continuous learning and professional growth. Our structured programs—such as the Performance Appraisal Policy, Performance Gap Review Policy, and Career Framework—enable regular performance evaluations, identify skill gaps, and support clear career progression.

In 2023, we implemented the SuccessFactors platform to align performance appraisals and employee career development & upgrade activities at a global level, ensuring transparency, consistency, and fairness across all regions. These initiatives empower our workforce, strengthen engagement, and build long-term capabilities aligned with individual aspirations and Actylis’ sustainability goals.

3.1.4. Occupational health and safety

Our corporate EHS policy and Labor & Human Rights Policy along with the local employee handbooks include clear provisions on health and safety.

In our manufacturing and warehousing facilities - where operational risks are higher, we apply the hierarchy of controls to minimize exposure to hazards. This includes prioritizing hazard elimination and substitution where feasible, implementing engineering and administrative controls, and ensuring the proper use of Personal Protective Equipment (PPE).

We reinforce these measures through Hazard and Operability Study (HAZOP) and Job Hazard Analysis (JHA), job observations, proactive hazard and near-miss reporting, regular employee training based on the hazard exposure groups, and regular EHS audits and inspections to drive continuous improvement and risk reduction.



OCCUPATIONAL HEALTH AND SAFETY - KPI'S	2023	2024
Lost Time Incident Rate (LTIR)	0.73	0
Lost Time Incident (LTI)	4	0
Total Recordable Incident Rate (TRIR)	1.81	0.51
Medical Treatment Case (MTC)	6	2
Fatality rate	0	0
Employee Training on Health & Safety	66%	90%
Management Visits	41	59
ESH Audit	5	14
ESH Inspection	95	649

Actylis’ Ahmedabad manufacturing site already has both ISO14001 and ISO45001 certifications. Other global manufacturing sites are at different stages of obtaining these certificates.

Actylis leverages the Velocity EHS Management System to strengthen our commitment to occupational health and safety across global operations.

This centralized platform enables consistent tracking of key EHS and sustainability KPIs, incident and risk management, audits, inspections, and regulatory compliance. Its modular structure—including action management, near-miss reporting, and region-specific compliance tools—supports proactive safety culture and continuous improvement. With mobile access, multilingual functionality, and real-time dashboards, the system enhances visibility and accountability, contributing to safer, more sustainable workplaces.

3.1.5. Diversity and equal opportunity

Actylis is committed to fostering a diverse, inclusive, and respectful workplace that provides equal opportunity for all. As outlined in our Global Labor & Human Rights Policy, we are an equal opportunity employer and do not tolerate any form of discrimination, harassment, or retaliation.

This commitment applies to all employment practices, including recruitment, hiring, training, promotion, compensation, and termination, and extends across all levels of the organization and geographies in which we operate.

Policy Framework

Actylis’ global policy explicitly prohibits discrimination and harassment on the basis of any protected characteristics, including but not limited to:

- Race, colour, and national origin
- Gender, gender identity, and sexual orientation
- Religion, age, disability, and veteran status
- Pregnancy, childbirth, or related medical conditions
- Marital status, citizenship, and other categories protected by law

This includes protection from both direct and perceived discrimination, as well as association-based bias.

3.1.6. Labour/management relations

Actylis respects employees’ rights to freedom of association and collective bargaining. Employees may join, form, or decline to join labor unions without fear of retaliation. Where collective negotiations occur, we maintain constructive dialogue with employee representatives.

Currently, no Actylis entity is covered by a collective bargaining agreement. Employee relations are governed by our Code of Conduct, local handbooks, and applicable laws.

We provide reasonable notice of significant operational changes as required by legislation. Actylis operates globally as an equal opportunity employer under “at-will” contracts where applicable.

3.1.7. Remuneration principles and process

Actylis’ employee remuneration policy essentially focuses on attracting, retaining, and motivating employees while ensuring fairness and compliance with the local and international labor laws. Key objectives on the policy include –

- **Ensure fairness and competitive compensation**
- **Align pay with the business goals and employee performance**
- **Maintain transparency and legal compliance**

Key policy statement includes – “Actylis recognizes the importance of providing fair wages to all its employees, direct as well as the contract employees and is committed to a fair pay for all. We offer our employees living wages and benefit packages that are comparable for our industry, and in line with respective local labor markets and laws. We ensure employees have work hours that are compliant with all applicable legal regulations. In addition, we strive to provide our employees with opportunities to broaden their skills through training and professional development programs”.

Actylis being a global organization, while the pay structure for full-time employees is largely determined by local country and region-specific regulations and the competitive wages landscape, it is broadly structured around –

- **Base Salary (fixed annual or monthly compensation)**
- **Variable Pay (bonuses, incentives, or profit-sharing)**
- **Benefits & Perks (health insurance, retirement plans, paid time off, parental leave, flexible work hours, remote working, etc.), and**
- **Equity Compensation (as applicable).**

Pay grades and bands are based on job roles, seniority, and experience with defined minimum and maximum salaries for each pay grade.

Actylis has performance-based remuneration policy and includes –

- **Set key performance indicators (KPIs) for incentives**
- **Link bonuses and salary increments to employee productivity**
- **Provide recognition rewards for outstanding contributions**

Compliance and legal considerations include –

- **Adhere to minimum wage laws and employment regulations**
- **Ensure fair pay practices and avoid discrimination**
- **Define policies for overtime and leave compensation**

At Actylis, the remuneration and compensation policy & process is regularly reviewed and adjusted by –

- **Conducting annual salary benchmarking**
- **Gathering employee feedback to improve policy and process**
- **Staying updated with industry trends and cost-of-living adjustments**

3.2 Contribution to local communities

At Actylis, we recognize our responsibility to positively impact the communities where we operate. Guided by our Global Labor & Human Rights Policy, we engage in local initiatives that promote environmental sustainability, education, and community well-being.

In 2024, our global teams supported various projects across regions. Some examples include:

Ahmedabad, India:

- Developed a Green Belt covering 3,000 sq. meters in a nearby village.
- Planted over 100 tree saplings and created a play area for local children.
- Donated to the PM CARES Fund to support national community development initiatives.

Buffalo, USA:

- Styrofoam Recycling: Recycled over 200 pounds of Styrofoam waste.
- E-Scrap Donation: Donated three pallets of electronic waste, supporting a local charity’s children’s summer camp program.
- Earth Day Cleanup: Staff volunteered to clean local areas around the facility.

Shanghai, China:

- Planted trees around Chinese Tree Planting Day and adopted historical trees in the name of Actylis in Shanghai Botanical Garden.
- Organised a trail-walk or trail-ride activity to promote the concept of environmental protection and individual health & safety to the society.





# 4 | Environmental Aspects

## 4.1 Management approach

Our sustainability strategy and related corporate targets are focused on three key areas:

- 1. Ensure environmental and social standards in our supply chain
- 2. Monitor carbon emissions and reduce our climate impact
- 3. Care for our products’ environmental footprint

## 4.2 Energy consumption

Energy consumption includes electricity, natural gas, propane, gasoline and diesel and other sources of energy.

Particulars (MWh)	2023	2024	Variation (%)
Total Electricity	8,350	8,962	7.07
Electricity	4,937	5,361	8.23
Renewable Electricity	3,413	3,601	5.36
Natural Gas	13,466	13,530	0.47
Diesel	86.4	35.5	-83.51
Propane and Other	0.11	-	-
Fugitive Refrigerants (tCO2e)	109	104	-4.69

Note: At Actylis, in 2024, over 40% of the electricity consumed globally came from the renewable (green) sources.

## 4.3 Water

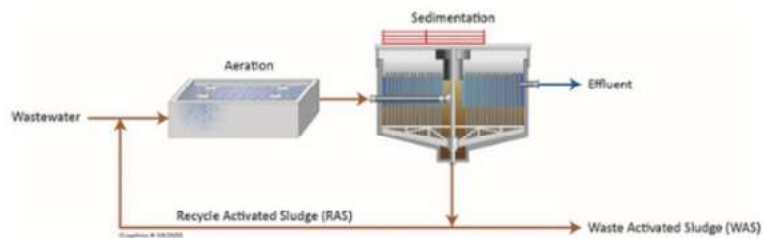
Actylis uses exclusively water supplied by the municipality or other public or private water utilities and wastewater goes into the public sewage system.

Water consumption (Cubic Meter)	2023	2024	Variation (%)
Water Consumption	58,821	63,671	7.92

### Ogden Site:

#### Wastewater Management:

Partnering with a third-party engineering firm, the site implemented a two-phase plan. Phase 1 included installing a wastewater storage tank to separate solids, with temporary off-site treatment by a third party. Phase 2, planned in 2025, involves setting up an in-house treatment system to remove copper and zinc—reducing long-term environmental impact.



Runcorn Site:

Wastewater recycling resulted into reduction in over 25000 litre of water consumption.

Limerick Site:

Rinse waste recycling resulted in reduction in over 19000 litre of water consumption.

4.4 Air

Ogden Site:

Dust Control

At Ogden site, the largest concern for airborne dust was identified as dry sweeping during cleanup in the grinder rooms. To improve air quality, new lids were installed on containment barrels to prevent powder blow-by. This enhanced the baghouse system’s performance. Also, the implementation of the dust control arms tied directly to dust collector system, and the use of PPE, collectively have shown to provide dramatic dust control especially in the grinder rooms. Visitors and contractors have since noted a marked improvement in airborne dust and odor conditions.



4.5 Emissions

Actylis reports its GHG emissions in accordance with the provisions of the Greenhouse Gas Protocol (<https://ghgprotocol.org/>)  
GHG emission reduction goals are set in line with the Paris Agreement – 1.5 degree C.

- SCOPE 1: All direct emissions from sources owned and controlled directly by the Group. Actylis’ Scope 1 emissions are based on the Group’s consumptions of natural gas and fuel, refrigerants, and fleet vehicles.
- SCOPE 2: Emissions resulting from the production of the electricity consumed by the organization. Scope 2 covers the CO2 emissions resulting from energy purchased or acquired by the Group. Actylis’ Scope 2 emissions, only include the CO2 emissions resulting from the Group’s electricity consumption (no steam, heat, or cooling is consumed).

Particulars (MWh)	2023	2024	2024 (%)	Variation (%)
Scope 1	2,957	2,760	1.43%	-6.89
Scope 2	1,771	2,013	1.04%	12.79
Scope 3*	179,700	188,359	97.53%	4.71

Carbon Intensity 449 tCO2e per dollar revenue in 2024

Scope 1, 2 and 3 GHG emissions intensity 2024	tCO2e	Percentage (%)
Scope 1 Intensity	6.14	1.43
Scope 2 Intensity	4.66	1.04
Scope 3 Intensity*	438.00	97.53

\*Note: Scope 3 emissions cover “Purchased Goods and Services” & “Upstream Transportation” only.

4.6 Waste

The waste generated by Actylis’ various global facility is managed by their respective certified third-party service providers in line with contractual and local legislative obligations. These third-party service providers remove the waste material from the respective sites. This waste material may contain hazardous materials and is handled accordingly.

Waste (Metric Ton)	2023	2024	Variation (%)
Hazardous Waste	844	560	-40.46
Non-Hazardous Waste	633	1981	103.14





# 5 | Information About This Report

## 5.1 Management approach

This Sustainability Report has been prepared based on the “GRI Sustainability Reporting Standards” of the Global Reporting Initiative, using the “in reference” reporting option. The reporting period for the information provided in this Report is January 1, 2024 to December 31, 2024. Actylis plans to publish Sustainability Report annually.

### Social

Workforce-related data presented in this report (Section 3) was collected through Actylis’ HR representatives. Unless otherwise noted, the data covers the entire global workforce and is reported in headcount as of December 31, 2024.

### Environmental

Environmental data disclosed in this report is primarily based on a dedicated 2024 reporting campaign covering all Actylis sites. Energy, Greenhouse gas emissions (tCO<sub>2</sub>e) and water consumption figures (Sections 4.2 and 4.5) were derived from utility invoices and Gravity Climate tool.

## 5.2 Context Index

Sr. No	GRI Standards	Disclosures	Location	Pg. No.	Comments
Universal Standards					
GRI 1	Foundation		Section 5.2	41	
GRI 2	General Disclosures	<b>1 - The organization and its reporting practices</b>	*Company in brief	4	
		2.1 Organizational details	*Section 1.1 *Section 1.4	7 11	
		2.2 Entities included in the organization's sustainability reporting	*Section 5.1	41	
		2.3 Reporting period, frequency, and contact point	*Section 5.1 *Section 5.3	41 47	
		2.4 Restatements of information	Not applicable.		
		2.5 External assurance	Not applicable.		
		<b>2 - Activities and workers</b>			
		2.6 Activities, value chain, and other business relationships	*Company in brief *Section 1.3 *Section 1.7.6	4 8 18	
		2.7 Employees	*CellMark 2023 in brief *Section 3.1.2	4 31	
		2.8 Workers who are not employees	This information is not available for FY 2024.		Currently we do not have a global repository of the data. Planned to be available in 2026
		<b>3 - Governance</b>			
		2.9 Governance structure and composition	*Section 2 *Section 2	28 28	
		2.1 Nomination and selection of the highest governance body	*Section 2	28	
		2.11 Chair of the highest governance body	*Section 1.5	12	
			*Section 1.7.1	13	
		2.12 Role of the highest governance body in overseeing the management of impacts	*Section 1.7.2 *Section 1.9.1 *Section 2	14 21 28	
		2.13 Delegation of responsibility for managing impacts	*Section 1.7.1 *Section 2.3	13 29	
			*Section 2.1	28	
		2.14 Role of the highest governance body in sustainability reporting	*Section 5.3	47	



Sr. No	GRI Standards	Disclosures	Location	Pg. No.	Comments
		2.15 Conflicts of interest	*Section 2.1 *Section 1.8	28 20	
		2.16 Communication of critical concerns	*Section 1.9 *Section 1.10.5 *Section 2	21 24 28	
		2.17 Collective knowledge of the highest governance body	*Section 2.1	28	
		2.18 Evaluation of the performance of the highest governance body	*Section 2.1	28	
		2.19 Remuneration policies	*Section 3.1.7	34	
		2.2 Process to determine remuneration	*Section 3.1.7	34	
		2.21 Annual total compensation ratio	This information is not available for FY 2024.		
		<b>4 - Strategy, policies and practices</b>			
		2.22 Statement on sustainable development strategy	*Message from CEO *Message from CSO *Section 1.7.2 *Section 1.5 *Section 1.7.3	3 3 14 12 15	
		2.23 Policy commitments	*Section 1.9 *Section 1.10.2	21 25	
		2.24 Embedding policy commitments	*Section 1.9 *Section 1.10	21 24	
		2.25 Processes to remediate negative impacts	*Section 1.10.5	26	
		2.26 Mechanisms for seeking advice and raising concerns	*Section 1.10.5	26	
		2.27 Compliance with laws and regulations	*Section 1.9.5 *Section 1.10	22 24	
		2.28 Membership associations	*Section 1.7.5	17	
		<b>5 - Stakeholder engagement</b>			
		2.29 Approach to stakeholder engagement	*Section 1.7.6	18	
		2.3 Collective bargaining agreements	*Section 3.1.6	34	
GRI 3	Material Topics 2021	<b>1 - Disclosures on material topics</b>			
		3.1 Process to determine material topics	*Section 1.8 *Section 1.9 *Section 1.8	20 21 20	
		3.2 List of material topics	*Section 1.9 *Section 1.8	21 20	
		3.3 Management of material topics	*Section 1.9	21	
	<b>Topic disclosures</b>	<b>1 - Biodiversity 2024</b>			
	<b>Economic</b>	<b>1 - Economic</b>			
GRI 201	Economic Performance 2016	201 - Direct economic value generated and distributed	*Section 1.3.4	10	
		201 - Financial implications and other risks and opportunities due to climate change	This information is not available for FY 2024.		Financial due diligence of the impact is planned for 2026
		201 - Defined benefit plan obligations and other retirement plans	*Section 3.1.7	34	
		201 - Financial assistance received from government	Not Applicable		

Sr. No	GRI Standards	Disclosures	Location	Pg. No.	Comments
GRI 202	Market Presence 2016	202 - Ratios of standard entry level wage by gender compared to local minimum wage	This information is not available for FY 2024.		Assessment currently not available, planned for 2026.
		202 - Proportion of senior management hired from the local community	This information is not available for FY 2024.		Assessment currently not available, planned for 2026.
GRI 203	Indirect Economic Impacts 2016	203 - Infrastructure investments and services supported	Not Applicable		
		203 - Significant indirect economic impacts	*Section 1.3.4 *Section 1.4 *Section 1.7.6	10 11 18	
GRI 204	Procurement Practices 2016	204 - Proportion of spending on local suppliers	Given the global nature of Actylis' business, the proportion of spending on local suppliers is not relevant.		
GRI 205	Anti-corruption 2016	205 - Operations assessed for risks related to corruption	*Section 1.10.1 *Section 1.10.4	24 26	
		205 - Communication and training about anti-corruption policies and procedures	*Section 1.10.3	25	
		205 - Confirmed incidents of corruption and actions taken	To the best of Actylis' knowledge, there was no confirmed incident of corruption in the FY 2024.		
GRI 206	Anti-competitive Behaviour 2016	206 - Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	To the best of Actylis' knowledge, there was no material legal actions for anti-competitive behaviour, anti-trust, and monopoly practices in the FY 2024.		
GRI 207	Tax 2019	207 - Approach to tax	Confidentiality Constraints		
		207 Tax governance, control, and risk management	Confidentiality Constraints		
		207 - Stakeholder engagement and management of concerns related to tax	Confidentiality Constraints		
		207 - Country-by-country reporting	Confidentiality Constraints		
	<b>Environment</b>	<b>1 - Environment</b>			
GRI 301	Materials 2016	301 - Materials used by weight or volume	This information is not available for FY 2024.		
		301 - Recycled input materials used	Not applicable		
		301 - Reclaimed products and their packaging materials	Not applicable		
GRI 302	Energy 2016	302 - Energy consumption within the organization	*Section 4.2	37	
		302 - Energy consumption outside of the organization	*Section 4.2	37	
		302 - Energy intensity	*Section 4.2	37	
		302 - Reduction of energy consumption	*Section 4.2	37	
		302 - Reductions in energy requirements of products and services	This information is not available for FY 2024.		Bulk of Actylis' products are sourced from external manufacturers and hence do not have control over the energy reduction at product level



Sr. No	GRI Standards	Disclosures	Location	Pg. No.	Comments
GRI 303	Water and Effluents 2018	303 - Interactions with water as a shared resource	*Section 4.3	37	Assessment currently not available, planned for 2026.
		303 - Management of water discharge-related impacts	This information is not available for FY 2024. This information is not available for FY 2024.		
		303 - Water withdrawal	This information is not available for FY 2024. This information is not available for FY 2024.		
		303 - Water discharge	This information is not available for FY 2024.		
		303 - Water consumption	*Section 4.3	37	
GRI 304	Biodiversity 2016	304 - Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Not applicable.		
		304 - Significant impacts of activities, products and services on biodiversity	Not applicable.		
		304 - Habitats protected or restored	Not applicable.		
		304 - IUCN Red List species and national conservation list species with habitats in areas affected by operations	Not applicable.		
GRI 305	Emissions 2016	305 - Direct (Scope 1) GHG emissions	*Section 4.5	38	However, this is miniscule portion of the overall emissions.
		305 - Energy indirect (Scope 2) GHG emissions	*Section 4.5	38	
		305 - Other indirect (Scope 3) GHG emissions	*Section 4.5	38	
		305 - GHG emissions intensity	*Section 4.5	38	
		305 - Reduction of GHG emissions	*Section 4.5	38	
		305 - Emissions of ozone-depleting substances (ODS)	This information is not available for FY 2024.		
		305 - Nitrogen oxides (NOx), sulphur oxides (SOX), and other significant air emissions	This information is not available for FY 2024.		
GRI 306	Waste 2020	306 - Waste generation and significant waste-related impacts	*Section 4.6	39	This is managed by third party service providers and hence no visibility into end of the disposal process.
		306 - Management of significant waste-related impacts	*Section 4.6	39	
		306 - Waste generated	*Section 4.6	39	
		306 - Waste diverted from disposal	This information is not available for FY 2024.		
		306 - Waste directed to disposal	This information is not available for FY 2024.		
GRI 308	Supplier Environmental Assessment 2016	308 - New suppliers that were screened using environmental criteria	*Section 1.7.6	18	Assessment currently not available, planned for 2026.
		308 - Negative environmental impacts in the supply chain and actions taken	This information is not available for FY 2024.		
GRI 401	<b>Social</b> Employment 2016	<b>1 - Social</b> 401 - New employee hires and employee turnover	*Section 3.1.2	31	

Sr. No	GRI Standards	Disclosures	Location	Pg. No.	Comments
		401 - Benefits provided to full-time employees that are not provided to temporary or part-time employees	*Section 3.1.7	34	Currently we do not have a global repository of the data. Planned to be available in 2026
		401 - Parental leave	This information is not available for FY 2024.		
GRI 402	Labor/Management Relations 2016	402 - Minimum notice periods regarding operational changes	*Section 3.1.6	34	
GRI 403	Occupational Health and Safety 2018	403 - Occupational health and safety management system	*Section 3.1.4	32	
		403 - Hazard identification, risk assessment, and incident investigation	*Section 3.1.4	32	
		403 - Occupational health services	*Section 3.1.4	32	
		403 - Worker participation, consultation, and communication on occupational health and safety	*Section 3.1.4	32	
		403 - Worker training on occupational health and safety	*Section 3.1.4	32	
		403 - Promotion of worker health	*Section 3.1.4	32	
		403 - Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	*Section 3.1.4	32	
		403 - Workers covered by an occupational health and safety management system	*Section 3.1.4	32	
		403 - Work-related injuries	*Section 3.1.4	32	
GRI 404	Training and Education 2016	403 - Work-related ill health	*Section 3.1.4	32	
		404 - Average hours of training per year per employee	*Section 3.1.3	32	
		404 - Programs for upgrading employee skills and transition assistance programs	This information is not available for FY 2024.	32	
		404 - Percentage of employees receiving regular performance and career development reviews			

Sr. No	GRI Standards	Disclosures	Location	Pg. No.	Comments
GRI 405	Diversity and Equal Opportunity 2016	405 - Diversity of governance bodies and employees	*Section 2 *Section 3.1	28 28	Currently we do not have a global repository of the data. Planned to be available in 2026
		405 - Ratio of basic salary and remuneration of women to men	This information is not available for FY 2024.		
GRI 406	Non-discrimination 2016	406 - Incidents of discrimination and corrective actions taken	To the best of Actylis' knowledge, there was no confirmed incident of discrimination in FY 2024.		
GRI 407	Freedom of Association and Collective Bargaining 2016	407 - Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	There is no risk regarding the right to freedom of association and collective bargaining within Actylis' operations. To the best of Actylis' knowledge, no risk regarding the right to freedom of association and collective bargaining within suppliers was reported to the Group in FY 2024.		
GRI 408	Child Labor 2016	408 - Operations and suppliers at significant risk for incidents of child labour	Actylis does not employee child labor globally as a policy. Hence, there is no risk for incidents of child labor within Actylis' operations. To the best of Actylis' knowledge, no incidents of child labor within operations and suppliers was reported to the Group in FY 2024.		
GRI 409	Forced or Compulsory Labor 2016	409 - Operations and suppliers at significant risk for incidents of forced or compulsory labour	Actylis does not employee forced labor globally as a policy. Hence, there is no risk for incidents of forced labor within Actylis' operations. To the best of Actylis' knowledge, no incidents of forced labor within operations and suppliers was reported to the Group in FY 2024.		
GRI 410	Security Practices 2016	410 - Security personnel trained in human rights policies or procedures	Not Applicable		
GRI 411	Rights of Indigenous Peoples 2016	411 - Incidents of violations involving rights of indigenous peoples	Not Applicable		
GRI 413	Local Communities 2016	413 - Operations with local community engagement, impact assessments, and development programs	*Section 3.2	35	
		413 - Operations with significant actual and potential negative impacts on local communities	Not applicable. Given the nature of Actylis' business activities, the Group does not have any direct operations with significant actual and potential negative impacts on local communities.		
GRI 414	Supplier Social Assessment 2016	414 - New suppliers that were screened using social criteria	* Section 1.7.6	18	

Sr. No	GRI Standards	Disclosures	Location	Pg. No.	Comments
		414 - Negative social impacts in the supply chain and actions taken	To the best of Actylis' knowledge, there was no confirmed incident of social impact in supply chain in FY 2024.		
GRI 415	Public Policy 2016	415 - Political contributions	Actylis has not made any political contribution in the FY 2024		
GRI 416	Customer Health and Safety 2016	416 - Assessment of the health and safety impacts of product and service categories	* Section 1.7.6	18	
		416 - Incidents of non-compliance concerning the health and safety impacts of products and services	To the best of Actylis' knowledge, there was no incident of non-compliance concerning the health and safety impacts of products and services in the FY 2024.		
GRI 417	Marketing and Labelling 2016	417 - Requirements for product and service information and labelling	*Section 1.9.5	18	
		417 - Incidents of non-compliance concerning product and service information and labelling	To the best of Actylis' knowledge, there was no incident of non-compliance concerning product and service information and labelling in the FY 2024.		
		417 - Incidents of non-compliance concerning marketing communications	To the best of Actylis' knowledge, there was no incident of non-compliance concerning marketing communications in the FY 2024.		
GRI 418	Customer Privacy 2016	418 - Substantiated complaints concerning breaches of customer privacy and losses of customer data	To the best of Actylis' knowledge, there was no substantiated complaints concerning breaches of customer privacy and losses of customer data in the FY 2024.		

### 5.3 Contact

#### ESG & COMPLIANCE

#### Varun Vijay Rao

Chief Sustainability Officer

Aceto US LLC dba Actylis

Tri Harbor Court Port Washington, New York 11050 UNITED STATES

+1 516-627-6000

Email: Sustainability@actylis.com

Website: www.actylis.com

Feedback and suggestions on Actylis’ sustainability report are most welcome.





4 Tri Harbor Court  
Port Washington, NY 11050  
USA

---

US: +1 516 627 6000  
Europe: +33 4 72 00 42 20  
Asia: +91 2717 616717

---

**[www.actylis.com](http://www.actylis.com)**