



SOTERA HEALTH COMPANY

Conflict Minerals Policy

The U.S. Securities and Exchange Commission ("SEC") has adopted rules implementing Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Conflict Minerals Rule"). Under these rules, SEC reporting companies must annually file with the SEC a report regarding whether the products they manufacture or contract to manufacture contain "conflict minerals" originating from the Democratic Republic of the Congo or adjoining countries (collectively, the "Covered Countries"). "Conflict Minerals" or "3TG" refers to columbite-tantalite (coltan), cassiterite, wolframite, gold, and the derivatives tantalum, tin and tungsten, without regard to the location or origin of the minerals or derivative metals. Revenue from the mining, transport and processing of Conflict Minerals that originate from the Covered Countries are in some cases believed to be financing or benefiting groups responsible for armed conflict and human rights violations in the Covered Countries.

Sotera Health Company (collectively, with its subsidiaries, "Sotera Health", "we", "us" or "our") supports the humanitarian goals of the Conflict Minerals Rule, and we are committed to operating our business worldwide with respect for human rights and in compliance with applicable laws. Sotera Health does not directly source minerals from mines in the Covered Countries or elsewhere, and as a result we are reliant on our suppliers for information about their 3TG sourcing. In connection with our commitment to human rights and responsible sourcing, and consistent with guidance from the Organisation for Economic Co-operation and Development ("OECD"), for products in our supply chain that may include 3TG necessary to the functionality or production of products we manufacture or contract to manufacture, we conduct an annual reasonable country of origin inquiry ("RCOI"). We leverage the Conflict Minerals Reporting Template ("CMRT"), developed by the Responsible Minerals Initiative ("RMI"), and expect relevant suppliers to complete the CMRT, including by seeking upstream supply chain information to support their responses. We expect our suppliers to respect and uphold [Sotera Health's Supplier Code of Business Ethics and Conduct](#) and to respond to our requests for information. We also expect our suppliers to conduct appropriate due diligence, and provide full transparency regarding the countries of origin, and the smelters and refiners that process any 3TG in applicable products sold to us.

We recognize that a general prohibition on sourcing 3TG from Covered Countries may cause undue harm to local populations. Accordingly, where practical we encourage suppliers to source from RMI "conformant" smelters and refiners.

Suppliers to Sotera Health are expected to have or work towards responsible 3TG sourcing policies, due diligence frameworks, and management systems that align with RMI and [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#).

We reserve the right to make additional inquiries of suppliers regarding the origin of any 3TG contained in products sold to us. Sotera Health expects its suppliers to respond in a timely manner to our requests for information. We evaluate our relationships with our suppliers on an ongoing basis. Suppliers who do not reasonably comply with this Policy may be reviewed by our supply chain organization for future business and/or require remedial action, and where appropriate we will work towards the elimination of suppliers that are deficient in their 3TG sourcing practices.

We maintain a global ethics hotline, the [Sotera Health Ethics Line](#), where any identified or emerging supply chain issues or grievances may be lodged. Reports may be made online at www.soterahealth.ethicspoint.com or via telephone at 1-888-288-1841 in the United States. Information on how to make a report via telephone from outside of the United States is available at www.soterahealth.ethicspoint.com.