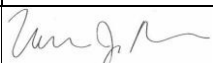


# Univar Solutions Inc. Policy

<b>RECOUPMENT OF INCENTIVE COMPENSATION – CLAWBACK POLICY</b>			
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## 1. PURPOSE/DEFINITIONS

- 1.1** Univar Solutions Inc. (the “Company”) expects its executives to responsibly steward and protect the Company and otherwise create value for the Company and its shareholders. This policy aims to ensure Company executives and other employees are appropriately dissuaded from and held accountable for any wrongdoing that results in an improper benefit to the individual or certain other misconduct.
- 1.2** As used herein, “Covered Individuals” shall mean current or former named executive officers, Section 16 officers, any vice president in charge of a principal business unit or function and any other officer or person performing policy making functions. As used herein, “Employee” shall mean any employee of the Company or one of its subsidiaries who receives Incentive Compensation (as defined herein).
- 1.3** As used herein, “Misconduct” shall mean engaging in intentional bad acts related to one’s employment with the Company or one of its subsidiaries including, but not limited to, fraud, felonious criminal activities, falsification of Company records, gross negligence, violent acts or threats of violence, or unethical conduct that causes substantial reputational harm to the Company or exposes the Company to substantial legal liability.
- 1.4** This policy shall apply to all forms of incentive compensation (including cash and equity awards) paid, earned, issued, vested or granted to a Covered Individual or Employee, including earnings on such incentive compensation (collectively “Incentive Compensation”), and shall be deemed incorporated into all incentive plan documents.

Owner’s Name: Noelle Perkins Date Approved: 10-29-2020	Review Period:	Next Review Date:
Owner’s Signature		Approved by Board. October 29, 2020

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### 2. COVERED CONDUCT

#### 2.1 Recoupment Due to Errors in Financial Reporting:

- a. In the event of a misstatement of the Company's financial statements, the Company shall be entitled to recover Incentive Compensation as follows:
  - (i) From a Covered Individual(s) when the Company concludes that a financial statement used as the basis for calculating the Incentive Compensation is required to be restated to correct a material error.
  - (ii) From an Employee who is not a Covered Individual when the Company concludes that a financial statement used as the basis for calculating the Incentive Compensation is required to be restated to correct a material error and the Employee's intentional or willful action or inaction caused, in whole or in part, the material error in the previously issued financial statement.
- b. For the purposes of this Section 2.1, the Company's right of recoupment shall extend to Incentive Compensation received during the three year period prior to the year in which the Company determines a restatement is required. The amount that shall be recouped is the difference between the Incentive Compensation granted, issued, paid, earned or vested and the amount that should have been granted, issued, paid, earned or vested based on the restated and corrected financial statement. Recoupment amounts shall be determined in accordance with the guidance of the Securities and Exchange Commission and shall be calculated on a pre-tax basis.
- c. Under certain circumstances, the Compensation Committee of the Company's Board of Directors (the "Committee") may, in its sole discretion, determine it is not advisable to recoup (either in whole or in part) Incentive Compensation from a Covered Individual or Employee, in which such case this policy shall not be enforced accordingly. Such circumstances include the following:
  - (i) The direct cost of pursuing recovery is likely to exceed the recoverable amount.
  - (ii) The recovery would violate a home country law.
  - (iii) The assertion of a claim may prejudice the interests of the Company in any way, including in any related proceeding or investigation.
  - (iv) Policy enforcement in relation to a specific individual would produce a manifestly unjust result.

#### 2.2 Recoupment Due to Misconduct:

In the event of Misconduct by a Covered Individual or Employee, the Company shall recoup any Incentive Compensation amounts paid, granted, issued, earned or vested relating to the Misconduct, as well as any Incentive Compensation that was paid, granted, issued, earned or vested after the Misconduct. With respect to Covered Individuals, the Committee shall determine, reasonably and in good faith, the amount of the recoupment. With respect to Employees who are not Covered Individuals, the CEO and General Counsel shall determine, reasonably and in good faith, the amount of the recoupment.

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### 3. Recovery/Other

- 3.1** Should a Covered Individual or Employee not make a reimbursement required under this policy, the Company may initiate an action or take such other steps as it deems appropriate to recover from such person the full amount of such reimbursement or, if permitted under applicable law, the Company may offset from any other obligations to such person an amount equivalent to the full amount of such reimbursement.
- 3.2** The actions taken under this policy shall be in addition to any other rights or remedies, legal or equitable, which the Company might have against the Covered Individual or Employee and shall not be deemed to preempt any other remedy or penalty that might be imposed against the Employee by a third party or governmental authority. There shall be no duplication of recoupment under this policy and any of 15 U.S.C. Section 7243 (Section 304 of The Sarbanes-Oxley Act of 2002) or Section 10D of the Securities Exchange Act of 1934, as amended (the “Exchange Act”).
- 3.3.** Notwithstanding anything in this policy to the contrary, nothing in this policy prevents any current or former Employee from providing, without prior notice to the Company, information to governmental authorities regarding possible legal violations or otherwise testifying or participating in any investigation or proceeding by any governmental authorities regarding possible legal violations, and for purpose of clarity current and former Employees are not prohibited from providing information voluntarily to the Securities and Exchange Commission pursuant to Section 21F of the Exchange Act.

### 4. History of Revisions

Revision Date	Section Number	Description/Modification
10-29-2020	Passim	Addition of Misconduct as event that may result in clawback as well as other conforming changes (whistleblower, no duplication of recovery, and recovery period clarifications); Revised/Board approved
02-07-2018		Reviewed/Board approved
11-5-2015		New