UNIVAR SOLUTIONS INC.
AMENDED AND RESTATED POLICY ON TRADING IN SECURITIES

Amended and Restated on February 17, 2023

This policy (this "Policy") of Univar Solutions Inc. and its subsidiaries (the "Company") concerns trading in the Securities of the Company, as well as trading in Securities of other companies. "Securities" means any equity or debt securities of a company (including, without limitation, common stock, bonds, debentures, warrants, options, preferred stock of, or derivative securities relating to, a company). This Policy applies to all directors, officers and employees of the Company, and to their immediate family members and other persons living in their households ("Company Associates" or "you"). Sections III and IV of this Policy include special restrictions and procedures for "Designated Insiders" and "Section 16 Insiders," as defined in those sections.

The Company's reputation for integrity and high ethical standards in the conduct of its affairs is of paramount importance. To preserve this reputation, it is essential that all your transactions in Securities conform to U.S. securities laws and avoid even the appearance of impropriety.

All Company Associates must familiarize themselves with this Policy and abide by it. Violations of this Policy may result in civil and criminal penalties under U.S. securities laws, and in disciplinary action by the Company, up to and including termination of employment.

The obligations of the General Counsel of the Company hereunder may be delegated by the General Counsel, with the approval of the Chief Executive Officer.

I. Prohibition Against "Insider" Trading and Tipping (Applies to All Company Associates)

The term "insider trading" is not defined in any of the federal securities laws, but generally refers to trading in Securities on the basis of material nonpublic information as further described below. The term "tipping" means sharing material nonpublic information with a third party, whether or not for compensation.

You may not, directly or indirectly, purchase or sell Securities of the Company while in possession of material nonpublic information concerning the Company or its affiliates. Similarly, you may not trade in the Securities of another company if you obtained material nonpublic information about that company in the course of your employment by the Company. In addition, you may not give material nonpublic information to another person; you and any person to whom you provide any material nonpublic information would potentially be subject to fines and imprisonment. Insider trading and tipping are civil and criminal violations of law. Transactions that may be necessary or justifiable for independent reasons (such as the need to raise money for an emergency situation) are not exceptions.

Ensuring the confidentiality of nonpublic information is the single most important step to minimizing the risk of illegal insider trading and tipping. Therefore, all Company Associates must ensure the confidentiality of information to which they have access. This means that unless the information is otherwise publicly available, you must limit access to that information to Company Associates who have a reasonable need to know the information for the purpose of carrying out the assignment for which the information is furnished. Special confidentiality agreements may be required for others (including outside business associates, governmental agencies and trade associations), seeking access to material nonpublic information. For further information regarding when the Company requires a confidentiality agreement, please contact the General Counsel.

Who is an Insider?

Anyone who possesses material information about the Company or its affiliates that such person obtained directly or indirectly from the Company may be considered an "insider" under U.S. securities laws. In addition to officers and directors (and to some extent certain other Company Associates) of the Company, certain individuals outside of the Company can become "temporary insiders" by having a special confidential relationship with the Company resulting in access to material nonpublic information. Such persons can include, for example, outside attorneys, accountants, actuaries, consultants, advisors and bank lending officers.

What is Material Nonpublic Information?

Whether information is *material* can be challenging to evaluate in the abstract and typically is assessed with the benefit of hindsight. There always is information about the Company or its affiliates that is not generally known to the public. This information is "material" if it would be likely to affect the stock price of the Company, or if it would be important to a reasonable investor in making a decision about whether to buy, hold or sell Securities of the Company. Either positive or negative information may be material. Below are some examples of information that, if not publicly known, could constitute material nonpublic information:

- financial results and other earnings information;
- financial forecasts and plans;
- possible acquisitions, dispositions, joint ventures and other major transactions;
- major personnel or management changes;
- information that could have an impact on earnings (such as unanticipated write-downs or gains and operating losses or gains);
- the gain or loss of a significant customer or supplier;
- a major lawsuit or governmental investigation;
    - significant labor disputes;
- a change in auditor, substantial changes in accounting methodologies or auditor notification that an issuer may no longer rely on an audit report;

- a new issuance of stock or debt or other significant financing developments (*e.g.* defaults, repurchase plans, stock splits);

- a possible change in control; or

- any other nonpublic information (even information not exclusively relating to the business of the Company or its affiliates) that could reasonably be expected to affect the price of Securities of the Company.

Material information about the Company or its affiliates should be considered *nonpublic* unless there is a certainty that it is publicly available. For example, Company Associates should assume that the information is not public unless the information has been disclosed in a press release, in a public filing (such as a report filed on Form 10-K, Form 10-Q or Form 8-K) made with the U.S. Securities and Exchange Commission (the "SEC") or in materials provided to shareholders (such as an annual report, investor letter, prospectus or proxy statement), or is available through a news wire service or daily newspaper of wide circulation, **and** a sufficient amount of time has passed (generally at least two full business days) so that the marketplace has had an opportunity to digest the information.

If you wish further clarification about whether particular information is publicly available, please contact the General Counsel.

How else can I act to avoid tipping someone about material nonpublic information?

In addition to limiting access to information as discussed above, to avoid potentially tipping someone, consider the following:

- mark material nonpublic information "Confidential" so that everyone knows that it should be kept confidential and keep the information somewhere not generally accessible to others;

- refer questions about the Company from the media to the Corporate Communications Department and from investors or financial analysts to the Investor Relations Department;

- do not discuss business matters in public places, such as elevators, hallways, lobbies, restrooms and public transportation facilities;

- never discuss the Company in an internet chat room or on a non-Company website;

- never give trading advice of any kind to anyone concerning Company Securities; and

- comply with all Company communications policies and employment agreements.

Is this Policy Limited to Trading in Securities of the Company?

No, the prohibition on insider trading in this Policy is **not** limited to trading in Securities of the Company. It is a violation of this Policy to trade in the Securities of another company if you obtained material nonpublic information about that company in the course of your employment by the Company. It is important to recognize that you may come into possession of material nonpublic information concerning other companies in the ordinary course of your employment responsibilities, such as dealings with major customers, suppliers or other parties to business transactions (*e.g.,* acquisitions, investments or sales). Remember that information that is not material to the Company or its affiliates may nevertheless be material to one of those other companies or their Securities, and it is not permissible under this Policy for you to make personal use of material nonpublic information gained in the course of your employment.

What are the penalties for violating the insider trading laws?

Potential penalties for an insider trading violation include (a) imprisonment of up to 20 years, (b) a criminal fine of up to $5 million (no matter how small the profit gained or loss avoided), and (c) civil penalties of up to three times the profit gained or loss avoided. If the Company fails to take appropriate steps to prevent illegal insider trading, the Company may have "controlling person" liability for trading violations, with a criminal penalty of up to $25 million and civil penalties of up to the greater of $1 million or the three times the profit gained or loss avoided. The civil penalties can extend personal liability to the Company's directors, officers, and other supervisory personnel if they fail to take appropriate steps to prevent insider trading.

If any Company Associate is found to have violated securities laws (whether or not prosecuted or sued by a government authority or private party) or to have violated this Policy, such person will be subject to dismissal or other sanctions and to possible claims by the Company for damages sustained by reason of his or her activities.

Does the Policy Cover the Exercise of Employee Stock Options?

This Policy does not apply to the exercise of an employee stock option using cash or to the exercise of a tax withholding right pursuant to which you elect to have the Company withhold shares subject to an option to satisfy tax withholding requirements. This Policy does apply, however, to any sale of stock as part of a broker-assisted cashless exercise of an option and any other market sale for the purpose of generating the cash needed to pay the exercise price of an option.

Does the Policy Apply To the Vesting of Restricted Stock Units ("RSU") or Performance-Based Restricted Stock Units ("PRSU")?

This Policy does not apply to the vesting of RSUs or PRSUs or to the exercise of a tax withholding right pursuant to which you elect to have the Company withhold shares to satisfy tax withholding requirements upon any such vesting. The Policy does apply, however, to any open market sale of shares acquired pursuant to such vesting, including to satisfy tax liabilities.

Does the Policy Apply to the Employee Stock Purchase Plan?

Participation in the Employee Stock Purchase Plan is equivalent to the decision to

purchases Securities of the Company and accordingly, this Policy applies to your election to participate in the plan for any enrollment period. This Policy also applies to any changes to your elections under the plan and to your sales of Securities of the Company purchased pursuant to the plan. However, this Policy does not apply to purchases of Securities of the Company resulting from your periodic contribution of money to the plan pursuant to the election you made at the time of your enrollment in the plan. This Policy also does not apply to purchases of Securities of the Company resulting from lump sum contributions to the plan, provided that you elected to participate by lump sum payment at the beginning of the applicable enrollment period.

II. Additional Transactions of Concern (Applies to All Company Associates)

A. Short Sales

Short sales of Securities of the Company evidence an expectation on the part of the seller that such Securities will decline in value, and signal to the market an absence of confidence in the short-term prospects of the Company or its affiliates. In addition, short sales may reduce the seller's incentive to improve the performance of the relevant company. **For these reasons, short sales of Securities of the Company are prohibited by this Policy.** Moreover, Section 16(c) of the Securities Exchange Act of 1934 (as amended, the "Exchange Act") generally prohibits officers and directors from engaging in short sales.

B. Publicly Traded Options

An open market transaction in traded options is, in effect, a bet on the short-term movement of the Securities of the Company and creates the appearance that the Company Associate is trading based on nonpublic information. Transactions in options also may focus a Company Associate's attention on short-term performance at the expense of the long-term objectives of the relevant company. **Accordingly, transactions in puts, calls or other derivative Securities (whether on an exchange or in any other organized market) with respect to the Securities of the Company are prohibited by this Policy.** (Option positions arising from certain types of hedging transactions are governed by the "Hedging Transactions" section.)

C. Hedging Transactions

Certain forms of hedging or monetization transactions (such as zero-cost collars and forward sale contracts) allow a person to lock in much of the value of his or her stock holdings, often in exchange for all or part of the potential for upside appreciation in the stock. These transactions allow the person to continue to own the applicable Security, but without the full risks and rewards of ownership. When that occurs, the person may no longer have the same objectives as the company's other shareholders. **Therefore, the Company prohibits Company Associates from engaging in such transactions with respect to Securities of the Company.**

D. Margin Accounts and Pledges

Securities held in a margin account may be sold by the broker without the customer's consent if the customer fails to meet a margin call. Similarly, Securities pledged (or hypothecated) as collateral for a loan may be sold in foreclosure if the borrower defaults on the loan. A margin sale or foreclosure sale may occur at a time when the pledgor is aware of material nonpublic information or otherwise is not permitted to trade in Company Securities pursuant to a blackout

period restriction. Therefore, the Company prohibits you from pledging Company Securities as collateral for a loan, whether through a margin account or otherwise.

III. Special Trading Restrictions on Designated Insiders

A. Trading Blackout Periods

All Company Associates must limit transactions in Securities of the Company to periods when they can reasonably be satisfied that there are no pending nonpublic material developments that might have a bearing on the market price of such Securities. In addition to this general prohibition applying to all Company Associates, there are further trading restrictions on certain Company officers, directors and employees who routinely have access to material nonpublic information, specifically including, without limitation, (*i*) all directors of the Company, (*ii*) the Chief Executive Officer and all persons reporting directly to the Chief Executive Officer having operational or functional responsibilities (i.e., the Executive Committee), (*iii*) the Chief Financial Officer and all persons in the finance organization of the Company having access to the unreported consolidated financial results or projections of the Company, (*iv*) members of the Company's Disclosure Committee[1], (*v*) members of the Investor Relations Department, (*vi*) all Section 16 Insiders (as defined below), (*vii*) any other member of the global leadership team having access to the Company's unreported financial results and projections (collectively, "Designated Insiders"). A list of Designated Insiders is maintained by the Legal Department.

Purchases and sales of Securities of the Company by Designated Insiders, as well as their immediate family members, any other persons living in a Designated Insider's household and any entities a Designated Insider may control (each, a "Related Person"), will not be permitted at the following times when material nonpublic information may exist:

1. During the period beginning 15 days prior to the end of a quarter and ending at close of business on the Trading Day following the filing of the related Form 10-K or Form 10-Q. "Trading Day" means a day on which the NYSE is open for trading.

2. From time to time, an event may occur, or other information may become known, that is material to the Company and is known by only a few individuals. So long as the event or related information remains material and nonpublic, the persons who are aware of the event or other information, as well as other persons whose trades are subject to pre-clearance requests under Section IV of this Policy, may not trade in the Securities of the Company. In addition, developments affecting the Company's financial results may be sufficiently material in a particular fiscal quarter that, in the judgment of the General Counsel, Designated Insiders should refrain from trading in the Securities of the Company even sooner than the typical blackout period described above. In these situations, the General Counsel may notify these persons that they may not trade in the Company's Securities, without disclosing the reason for the restriction. The existence of an event-specific blackout will not be announced, other than to those who are aware of the event giving rise to the blackout. If, however, a person whose trades are subject to pre-clearance requests

[1] The Disclosure Committee is the group of executives and department leaders from accounting, finance, legal, audit and tax that meet to review the disclosures to be made in the Company's 10-K or 10-Q filings to ensure disclosures are complete and accurate.

permission to trade in the Company's Securities during an event-specific blackout, the General Counsel will inform the requesting person of the existence of a blackout period, without disclosing the reason for the blackout. Any person made aware of the existence of an event-specific blackout should not disclose the existence of the blackout to any other person. The failure of the General Counsel to designate a person as being subject to an event-specific blackout will not relieve that person of the obligation not to trade while aware of material nonpublic information.

Even if a blackout period is not in effect, at no time may you trade in Company Securities if you are aware of material nonpublic information about the Company or its Securities. If you have any questions about whether specific information constitutes material nonpublic information regarding the Company or its Securities, please contact the General Counsel.

B. Rule 10b5-1 Plans

1. A Designated Insider may be able to trade in Securities of the Company during the restricted periods set forth above if the Designated Insider has entered into a so-called Rule 10b5-1 plan ("Trading Plan"). Trading Plans allow corporate insiders to establish an affirmative defense to insider trading allegations by effecting transactions pursuant to a pre-established written plan that specifies (by, for example, formula or actual dates) when trades are to be made and is entered into at a point in time when the insider does not possess material nonpublic information. In general terms, a Trading Plan can be designed to allow purchases and sales even when the Designated Insider would otherwise be blocked by a blackout period or the possession of material nonpublic information.

2. A Designated Insider may have only one single-trade Trading Plan during any 12-month period and may not have multiple, overlapping Trading Plans during the same period.

3. To set up a Trading Plan, a Designated Insider should work with his or her broker or financial institution to prepare the document. Any Designated Insider's Trading Plan (including any amendment or other modification, termination or suspension of the Trading Plan) must:

a. be in writing and in a form acceptable to the Company;
b. be acknowledged in writing by the General Counsel prior to becoming effective;
c. comply with applicable "cooling off period" requirements (ranging from 30 days to 90 days or more depending on whether the individual is a Director or Officer or otherwise);
d. include a certification from the Designated Insider attesting to the fact that he or she is not aware of any material nonpublic information and is adopting the Trading Plan in good faith and not as part of an effort to evade insider trading rules; and
e. not be entered into during a blackout period.

Note that any Trading Plan entered into by a Company director or officer is subject to disclosure in certain of the Company's SEC filings. Further, trades made by any Section 16 Insider under any such Trading Plan will be specifically identified on the applicable Form 4 or 5 filing, which will also disclose the Trading Plan's date of adoption. Please refer to the Guidelines for

Rule 10b5-1 Plans attached as Exhibit A to this Policy for additional information.

IV. Section 16 Insiders

Section 16 of the Exchange Act and the regulations thereunder require officers, directors and 10% stockholders of the Company ("Section 16 Insiders") to report to the SEC numerous types of transactions (including gifts) in the Company's common stock or other equity Securities. Such reporting is generally made on an SEC-prescribed document known as a "Form 4."

Section 16 Insiders, together with their immediate family members and other persons living in their households, may not engage in any transaction involving the Securities of the Company (including a stock plan transaction such as an option exercise, or a gift, contribution to a trust or any other transfer) without first obtaining pre-clearance of the transaction from the General Counsel and the Chief Executive Officer. A request for pre-clearance should be submitted to the General Counsel and the Chief Executive Officer at least two business days in advance of the proposed transaction. The General Counsel and the Chief Executive Officer are under no obligation to approve a trade submitted for pre-clearance and may determine not to permit the trade. In addition, the General Counsel may not trade in the Securities of the Company unless the Chief Executive Officer of the Company has approved the trade(s) in accordance with the procedures set forth in this Section IV. If pre- clearance is denied, the person seeking pre-clearance must refrain from initiating any transaction in the Securities of the Company, and that denial must be kept confidential by the person requesting pre-clearance. Unless otherwise provided, pre-clearance of a transaction is valid for three business days. If the transaction is not executed within that time, the person must request pre-clearance again before executing the transaction.

Pre-clearance of a trade, however, is not a defense to a claim of insider trading and does not excuse a person from otherwise complying with insider trading laws, this Section IV or the Policy. When a request for pre-clearance is made, the requestor should carefully consider whether he or she may be aware of any material nonpublic information about the Company and should describe fully those circumstances to the General Counsel and the Chief Executive Officer. The requestor should also indicate whether he or she has effected any non-exempt "opposite-way" transactions within the past six months, and should be prepared to report the proposed transaction on an appropriate Form 4 or Form 5. The requestor should also be prepared to comply with SEC Rule 144 and file a Form 144, if necessary, at the time of any sale.

Reminders and Alerts; Power of Attorney

Because the risk of late Form 4 filings and filings containing inaccurate information is considerable, and because of heightened public scrutiny, we will be sending to Section 16 Insiders periodic preventive Reminders and Alerts during the course of the year. In addition, in order to enable the Company to prepare and file Forms 4 on a timely basis, Section 16 Insiders must sign and return a power of attorney in a form provided by the Company.

V. Post-Termination Transactions

This Policy continues to apply to your transactions in Securities of the Company even after you are no longer employed by the Company. If you are in possession of material nonpublic information when your employment terminates, you may not trade in such Securities until that information has become public or is no longer material.

VI. Assistance with Compliance

The ultimate responsibility for adhering to this Policy and avoiding improper Securities transactions rests with each Company Associate. If you violate this Policy the Company may take disciplinary action against you, up to and including dismissal for cause.

Any Company Associate who has any questions regarding this Policy or who is unsure whether information relating to the Company, its Securities, its affiliates or any other publicly traded company is "material," or whether it has been disclosed to the public, should contact the General Counsel before taking any action. You should not try to resolve these issues on your own, as the rules relating to insider trading are complex and violations can result in severe consequences.

VII. No Third Party Beneficiaries

This Policy has been adopted to protect the good name, reputation, franchises, assets, businesses and prospects of the Company and its affiliates. It is not intended to, and does not, create any legal rights in any third parties, including investors, partners, creditors, customers, suppliers and others having business relations with such entities.

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For More Information

If you have a question about this Policy or the application of such policy to a particular situation, please contact the General Counsel at 1-331-777-6000. If you observe potential violations of this Policy, please talk to your manager or report those facts through the Univar Solutions Compliance and Ethics Alertline by telephone at 1-866-605-2999 or by web at www.univar.ethicspoint.com.

POLICY ON TRADING IN SECURITIES		
Number: GLO-01010	Effective Date: February 17, 2023	Supersedes: November 1, 2019
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Number: GLO-01010	Effective Date: July 13, 2016	Supersedes: June 19, 2015

UNIVAR SOLUCTIONS INC.

Guidelines for Rule 10b5-1 Plans

These guidelines are designed to facilitate the review of pre-arranged trading plans under Rule 10b5-1 ("Rule 10b5-1") of the Securities Exchange Act of 1934 (the "Exchange Act") submitted to the General Counsel of Univar Solutions Inc. (the "Company") for approval pursuant to the Company's Policy on Trading in Securities (the "Policy"). Capitalized terms used in these guidelines without definition are as defined in the Policy.

Pre-Arranged Plan Provisions – Each pre-arranged trading plan will be reviewed by the General Counsel to determine whether it contains the following mandatory terms, unless the General Counsel recognizes the need to make an exception in a particular case.

- The plan must affirm an intent to comply with Rule 10b5-1
- If the Company Associate is an "officer" (as defined in Section 16 of the Exchange Act, an "Officer") of the Company or a member of the Board of Directors of the Company (a "Director"), the plan must include a certification by the Company Associate that the Company Associate is not aware of material non-public information about the Company or its securities
- If the Company Associate is an Officer or a Director, the plan must include a certification by the Company Associate that the Company Associate is adopting the plan in good faith and not as part of a plan or scheme to evade the prohibitions of Section 10(b) or Rule 10b-5 of the Exchange Act
- The plan must specify the nature of the plan (e.g., purchase or sale)
- The plan must specify the terms of all transactions (identify the amounts, prices, and dates of transactions)
- If the Company Associate is an Officer or a Director, the plan must provide for a waiting period of at least the later of (1) 90 days after the adoption (or modification) of the plan and (2) two business days following the disclosure of the Company's financial results in a Form 10-Q or Form 10-K for the fiscal quarter in which the plan was adopted (or modified) (but not to exceed 120 days following plan adoption or modification), before execution of the first (or next transaction, in the case of a modification) transaction under the plan
- If the Company Associate is not an Officer or Director, the plan must provide for a waiting period of at least 30 days after adoption (or modification) of the plan before execution of the first transaction (or next transaction, in the case of a modification) under the plan
- The plan must specify a termination date that is at least six months following the effective date of the trading plan
- If the Company Associate is an Officer or Director, the plan must include reporting compliance provisions instructing parties effecting transactions to provide timely notification of such transactions for purposes of assuring compliance with applicable

reporting requirements, such as those arising under Rule 144 of the Securities Act of 1933 and Section 16

Additional Requirements/Considerations – The following requirements and considerations apply in connection with any pre-arranged trading plan unless the General Counsel recognizes the need to make an exception in a particular case.

- The plan may not be entered into during a blackout period
- The plan must be entered into, and may only be amended, modified or terminated, while the Company Associate is not aware of any material, non-public information regarding the Company
- The plan may not be amended, modified or terminated by the Company Associate without the prior approval of the General Counsel, which approval may require a waiting period, as appropriate
- The Company Associate may only have one pre-arranged trading plan in effect at any time
- In connection with the entry into a plan, if the Company Associate is an Officer or Director, the Company Associate should consider, in consultation with the General Counsel, whether Section 16(b) of the Exchange Act will present any problems. Most transactions under Rule 10b5-1 trading plans are likely to involve open-market sales or purchases that could be matched with opposite-way transactions within less than six months to produce profits recoverable by the issuer under Section 16(b). An Officer or Director establishing a plan should determine whether there are any potentially matchable transactions in the past, or in the future, that could cause profits from plan transactions to be lost under Section 16(b)