

Business Partner Code of Conduct

OUR COMMITMENT

Elementis and the companies in its group are committed to ensuring that “Integrity is our Specialty” in line with our Values of Safety, Solutions, Ambition, Respect and Team. We are committed to complying with the law, ensuring the protection of human rights, high standards of ethical behaviour and environmental practices throughout our business and our supply chain.

As part of this commitment, we require our suppliers, distributors and agents (“**Elementis Business Partners**”) to agree to and comply with this Business Partner Code of Conduct (“**Business Partner Code**”). Please sign at the end of the document.

We recognise that our suppliers work in different legal and cultural environments across the globe. This Business Partner Code sets out the basic requirements, based on international standards, that we expect of Elementis’ Business Partners (including distributors, agents, suppliers, vendors, service providers, independent contractors and consultants), as a condition of conducting business with Elementis. Elementis is committed to the United Nations Global Compact and the International Labour Organisation’s Declaration on Fundamental Principles and Rights and Work.

The Business Partner Code consists of the following core principles:

1. Provide a safe and healthy workplace
2. Act lawfully and ethically
3. Promote a respectful, fair and diverse workplace
4. Protect the environment and community

We also expect Elementis Business Partners to have a similar Code or policy, which covers the equivalent principles to this Business Partner Code, for their own suppliers and business partners.

If anyone has concerns that this Business Partner Code is not being complied with they can let us know via our *IntegrityCounts* hotline, the details of which are at the end of this Code.

By doing business in accordance with this Business Partner Code, we are all positively contributing to society and the environment, for everyone around us.

1. PROVIDE A SAFE AND HEALTHY WORKPLACE

1.1 HEALTH AND SAFETY STANDARDS

Elementis Business Partners must meet or exceed the requirements of applicable health and safety laws and regulations. Elementis Business Partners must maintain a safe, healthy and secure workplace. Any residential facilities must also be safe, healthy and secure. Work areas must be of a standard to prevent accidents, injuries and illnesses and to ensure an adequate level of sanitation. Elementis Business Partners must reduce the potential for injuries and illnesses in the workplace by eliminating or minimizing workplace hazards.

1.2 HEALTH AND SAFETY TRAINING

Elementis Business Partners must provide relevant health and safety training to workers.

1.3 HEALTH AND SAFETY REPORTING

Elementis Business Partners must have systems in place for their employees to report accidents, injuries and unsafe practices or conditions. Elementis Business Partners must maintain appropriate records of accidents and injuries.

2. ACT LAWFULLY AND ETHICALLY

2.1 LEGAL COMPLIANCE

Elementis Business Partners must comply with applicable laws and regulations in the countries where they do business. If applicable laws conflict with the provisions in this Business Partner Code, Elementis Business Partners must comply with the law, while seeking to meet the principles within this Business Partner Code.

2.2 PROHIBITION OF BRIBERY AND CORRUPTION

Elementis Business Partners and their officers, directors and employees must have the highest standards of ethical business conduct. They must not engage in bribery or corruption in any form, either directly or through third parties. We expect Elementis Business Partners to promote anti-bribery and anti-corruption compliance in their organizations through developing their own standards, which to help their organisations and employees meet their legal obligations, including the UK Bribery Act and the US Foreign Corrupt Practices Act.

2.3 IMPROPER GIFTS, HOSPITALITY AND ENTERTAINMENT

Elementis Business Partners must not give gifts or entertainment to Elementis employees or representatives, that could be interpreted as a bribe, create a conflict of interest or the appearance of a conflict. Modest gifts and hospitality may be allowed, if in accordance with the Elementis [Code of Conduct](#), Anti-bribery and Corruption Policy and Gifts & Entertainment Policy. Elementis Business Partners should not offer to Elementis employees or representatives:

- Anything that would break relevant laws
- Anything during an open tender or bidding process with Elementis
- Cash or cash equivalents including gift cards
- Travel or overnight accommodation for entertainment purposes
- Entertainment which the giver of the entertainment is not also attending
- Anything lavish or excessive
- Anything of a sexual, immoral or illegal nature
- Anything solicited by an Elementis employee or representative

2.4 CONFIDENTIALITY AND PRIVACY

Elementis Business Partners must respect and safeguard Elementis' confidential information (including personal information). Elementis Business Partners shall only use Elementis' confidential information for the purposes for which it was provided. Elementis Business Partners must promptly notify Elementis if they become aware of any intentional or unintentional improper disclosure or use of Elementis' confidential information. Elementis Business Partners must comply with applicable laws and regulations related to the protection and use of personal information.

2.5 FAIR COMPETITION

Elementis Business Partners must conduct their business fairly and ethically, and in compliance with all applicable fair competition and antitrust laws.

2.6 TRADE SANCTIONS

Elementis Business Partners must comply with all applicable trade sanctions and export control laws.

2.7 SOURCING AND MANUFACTURING PRODUCTS

Products and materials supplied by Elementis Business Partners must be appropriately and responsibly sourced and tested. These products and materials must also meet quality and safety industry norms for such items, as well as such other quality and safety standards as agreed between us. Elementis Business Partners must meet these standards and comply with all laws and regulatory requirements. These requirements apply both for goods or services supplied directly by the Business Partner to Elementis or indirectly via a third party, such as a sub-contractor.

3. PROMOTE A RESPECTFUL, FAIR AND DIVERSE WORKPLACE

3.1 CHILD LABOUR AND YOUNG WORKERS

Elementis Business Partners must not employ child labour. The term "child" means any person employed under the age of 15 (or 14 where the law of the country permits) or under the minimum age for employment in the country, whichever is greater. Elementis Business Partners employing young workers (workers above the minimum age of employment but under the age of 18) must comply with applicable laws and regulations regarding hours, compensation and must avoid conditions or restrictions that could be hazardous or are harmful to their education, morals, physical or mental health, safety or development.

3.2 FORCED LABOUR AND HUMAN TRAFFICKING

Elementis Business Partners must not use or benefit from any form of modern slavery, human trafficking, or forced or compulsory labour of any kind. This includes prison labour, bonded, or indentured labour. Mandatory overtime is not permitted.

Workers must be allowed to leave their employment after giving reasonable notice. Imposing monetary fines, withholding identity papers (such as passports), work permits, remuneration or requiring recruitment deposits or other constraints as a condition of employment, is not allowed.

Elementis Business Partners must be able to check that their sub-contractors and suppliers also comply with these requirements.

3.3 RESPECT AND DIGNITY

Elementis Business Partners must treat their employees with respect and dignity. They must not engage in any kind of physical, verbal, psychological or sexual abuse, harassment or any other forms of intimidation or misconduct.

3.4 WORKING HOURS

Elementis Business Partners must comply with the local legal or contractually agreed-upon limit on hours worked. Where no limit is imposed, workers should not work for more than 60 hours a week at most, outside of extraordinary circumstances. Workers must receive at least one day off in seven days, or the local legal standard (whichever is greater). Workers must be allowed any legally required daily rest periods, and must not be required to take work home.

3.5 WAGES BENEFITS AND TERMS OF EMPLOYMENT

Elementis Business Partners must pay their employees a fair wage which covers the costs of living and in compliance with local laws, and any collective agreement or legitimate individual contractual agreement. Elementis Business Partners must give their employees any legally prescribed benefits. Workers must not be subject to financial penalties as a disciplinary measure or to illegal deductions for benefits payments. Workers should receive clear written information on their pay and conditions.

3.6 DIVERSITY, EQUALITY AND INCLUSION

Elementis Business Partners must strive to create a workplace where all employees feel safe, respected, valued and free to contribute ideas and perspectives. Elementis Business Partners must strive to create a workplace that is free from harassment and discrimination and inclusive of all people and their unique abilities, strengths and differences.

Elementis Business Partners must provide equal opportunities, in all aspects of employment and must not subject their workers to any illegal discrimination with regard to recruitment, hiring, remuneration, promotion, access to training, professional development, retirement or termination. Any employment decisions must be based on worker's ability and not on personal characteristics such as race, creed, colour, religion, gender, sex, age, national origin, alienage or citizenship status, sexual orientation, gender identity or expression, marital, partnership or familial status, disability, genetic information, veteran/military status, domestic violence victim status, social background, caste, health status, pregnancy, or any other characteristic protected by law. Workers with the same qualifications, skills, experience and performance should receive equal pay for equal work, as required by local law.

3.7 FREEDOM OF ASSOCIATION

Elementis Business Partners must recognise the right of employees to freely associate and must comply with all local laws governing the right of employees to select or not to select workplace representatives.

3.8 GRIEVANCE PROCEDURES

Elementis Business Partners must have effective grievance procedures that allow for concerns to be raised and dealt with fairly and objectively, without retaliation.

4. PROTECT THE ENVIRONMENT AND COMMUNITY

4.1 ENVIRONMENT

Elementis Business Partners must meet all requirements of applicable environmental laws and regulations related to their products' development, manufacturing, and distribution.

Elementis Business Partners must consider the impacts of their decisions and activities on the environment.

Elementis Business Partners must take relevant steps to improve their environmental footprint which may include the promotion of sustainability initiatives such as energy and water conservation, reduction of greenhouse gas emissions, pollution prevention, and waste minimization, reuse, and recycling practices.

We expect Elementis Business Partners whose operations have an impact on nature in their local environment to protect and restore nature, biodiversity and the resilience of natural ecosystems, including (but not limited to) ensuring zero illegal deforestation, zero deforestation in high risk areas and no expansion on peatland.

5. REPORTING CONCERNS

5.1 INTEGRITYCOUNTS SPEAK UP LINE

If you have a concern about something which may be illegal, unethical or unsafe, or not consistent with this Code or Elementis' policies and procedures, and you do not feel able to raise the matter with anyone at Elementis, you may raise it confidentially and anonymously to the IntegrityCounts line. This is open to all third parties.

This service is hosted independently of Elementis and is available 24 hours a day, 7 days a week, in multiple languages. You can fill in an online form or use one of the telephone numbers below:

- Brazil 0-800-761-1959
- China 400-120-8514
- Finland 0 800 915 702
- Germany 0-8001806718
- India 000-8001007980
- Malaysia +60 154-877 1090
- Netherlands 00-800-2002-0033
- Taiwan 00-800-2002-0033
- UK 0-800-092-3586
- US 1-866-921-6714

The website <https://integrity-counts.com/org/elementis> provides instructions on raising a concern.

Please sign this Code on the next page

AGREEMENT

I hereby acknowledge, on behalf of the Business Partner, that I have received, read and understand the requirements of the Elementis Business Partner Code of Conduct. I confirm, on behalf of the Business Partner, that I'm an authorized signatory of the Business Partner and the Business Partner will comply with the Business Partner Code and the laws referred to in the Business Partner Code.

BUSINESS PARTNER NAME:

SIGNATURE:

NAME:

TITLE:

DATE: