

A close-up photograph of a Black woman scientist wearing safety glasses and a white lab coat. She is focused on her work, with her hands positioned over a multi-well plate. The background is a soft-focus laboratory setting with blue lighting. The overall tone is professional and scientific.

ELEMENTIS

A global specialty chemicals company

# INTEGRITY IS OUR SPECIALTY

Elementis Code of  
Conduct and Ethics



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# A MESSAGE FROM OUR CEO PAUL WATERMAN

At Elementis, we have a proud heritage extending over 175 years. Our reputation and success have been built on a tradition of innovation and a commitment to conducting business with integrity around the world. Today, we are more than a company – we are a global community capable of making a positive change in the world.

Throughout our organisation, we are committed to our Elementis Values of Safety, Solutions, Ambition, Respect and Team. By living these Elementis Values day to day, whatever our role, we each seek to demonstrate fairness and ethical behaviour throughout our business. From our products and solutions, and our relationships with customers and suppliers, to our workplace culture and our wider impact on communities and the environment – integrity is our speciality.

It is up to all of us to play our part in behaving ethically and fairly, in accordance with our Values. This Code of Conduct and Ethics helps us do this by setting out the legal obligations and ethical principles that we are committed to upholding. It provides guidance on how to apply these principles, how to ask for help and how to speak up if something does not seem right. Please take the time to familiarise yourself with this Code and to understand your responsibilities. Thank you for doing your part.

Paul Waterman,  
Chief Executive Officer



OUR VALUES &  
CORE PRINCIPLES

OUR CODE

OUR PEOPLE

OUR COMPANY

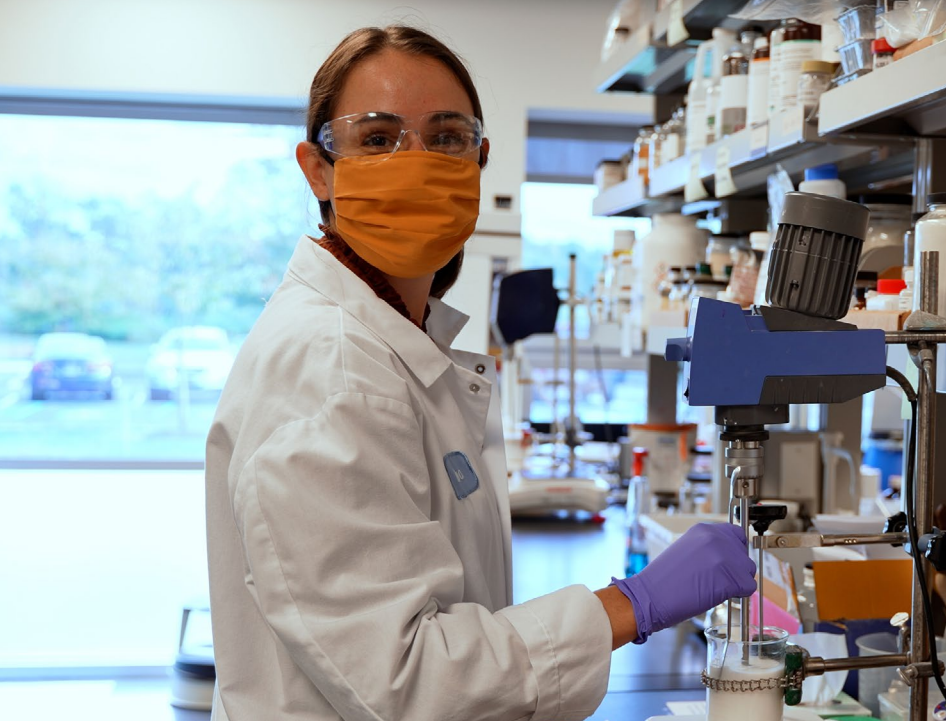
OUR  
CUSTOMERS  
& SUPPLIERS

OUR  
COMMUNITIES  
& THE  
ENVIRONMENT

ASKING QUESTIONS  
& RAISING CONCERNS

# OUR VALUES & CORE PRINCIPLES OF CONDUCT

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Our Values are:



### **Safety: Our Way of Life**

We are committed to providing a safe environment for all.



### **Solutions: Creating Value for Our Customers**

We make a difference through our expertise, responsiveness and focus on quality.



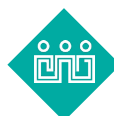
### **Ambition: Passion for Excellence**

We are innovative, courageous and driven in everything we do.



### **Respect: We Do the Right Thing**

We care for our colleagues, customers, communities and environment.



### **Team: The Power of Collaboration**

We work, grow and succeed together.

## OUR VALUES

Our Elementis Values guide our business, determine our success and shape our culture. They are at the core of every decision we make. Each of us is responsible for living these Values at all times.

## OUR CORE PRINCIPLES OF CONDUCT: HOW WE MAKE INTEGRITY OUR SPECIALTY

- We Act with Honesty and High Ethical Standards
- We Follow the Letter and Spirit of the Law
- We Value People, Communities and the Environment

OUR VALUES &  
CORE PRINCIPLES

OUR CODE

OUR PEOPLE

OUR COMPANY

OUR  
CUSTOMERS  
& SUPPLIERS

OUR  
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& THE  
ENVIRONMENT

ASKING QUESTIONS  
& RAISING CONCERNS

# OUR CODE

We are rightly proud of our distinguished heritage and are committed to protecting the long-term success of our business. High standards of ethical behaviour and compliance with laws are essential to how we do business. Our Code is a practical roadmap for acting with integrity. It offers guidance in acting in accordance with our Elementis Values, even in difficult situations. As the Code cannot cover every situation, it also sets out how to seek help and how to report any concerns.

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## INTEGRITYCOUNTS SPEAK UP LINE

If you have a concern about something which may be illegal, unethical or unsafe, or not consistent with this Code and 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 service is hosted independently of Elementis and is available 24 hours a day, 7 days a week, in multiple languages.

- 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 asking a question or raising a concern by completing an online form or by telephone. Additional information is provided in the [Asking Questions & Raising Concerns](#) section of this Code.

### To Whom Does the Code Apply?

Our Code applies to all Elementis employees, officers and anyone who represents us. We expect third parties we work with to uphold the principles of this Code as well, and we will cease collaborating with those who do not. These parties include temporary staff, joint ventures, suppliers and sub-contractors, intermediaries, agents, consultants and advisors.

### What Happens If We Don't Comply?

Elementis takes compliance with this Code very seriously. Non-compliance may result in punitive action, up to and including termination of employment and/or third-party contracts. In addition, breach of laws can expose Elementis and individuals to legal consequences.

### How to Use the Code

Our Code is divided into sections. It shows us how to act with integrity toward:

- Our People
- Our Company
- Our Partners and Third Parties
- Our Communities and the Environment

# OUR RESPONSIBILITIES

## Everyone's Responsibilities

Each of us is responsible for reading, understanding and applying our Code. We are all expected to:

- Read the Code, understand it and consult it often
- Understand how the Code applies to our own work and responsibilities
- Ask any questions we may have about any aspects of the Code
- Report any ethical concerns that arise

## Find Out More

[Asking Questions & Raising Concerns](#)



## Special Responsibilities of Managers

Managers have a special responsibility to act with integrity. If you are a manager, you are expected to:

- Lead by example: model high ethical standards, live our Values and never put business results above integrity
- Celebrate positive examples in others and hold your team accountable for behaviour that is not consistent with our Values and this Code
- Make sure all team members have access to this Code
- Recognise training needs for yourself and your team and make sure they are addressed
- Foster an inclusive environment
- Listen to the team's concerns, ensure that they are taken seriously and follow up as needed
- Avoid retaliation against anyone who raises a concern in good faith

## Ethics and Compliance at Elementis

Our Code is the cornerstone of the Elementis Ethics and Compliance Program. It helps us communicate clearly our commitments to doing business with integrity. The Ethics and Compliance Program promotes a company culture of complying with the law and doing business ethically. It provides the framework for:

- Making a culture of ethics and compliance apparent and accessible to all employees and third parties doing business with Elementis
- Providing training on key compliance topics and guidance in response to questions
- Guaranteeing that all concerns are investigated appropriately
- Ensuring ethical and compliance matters are considered and weighted appropriately in all Elementis business decisions





### Making Ethical Decisions

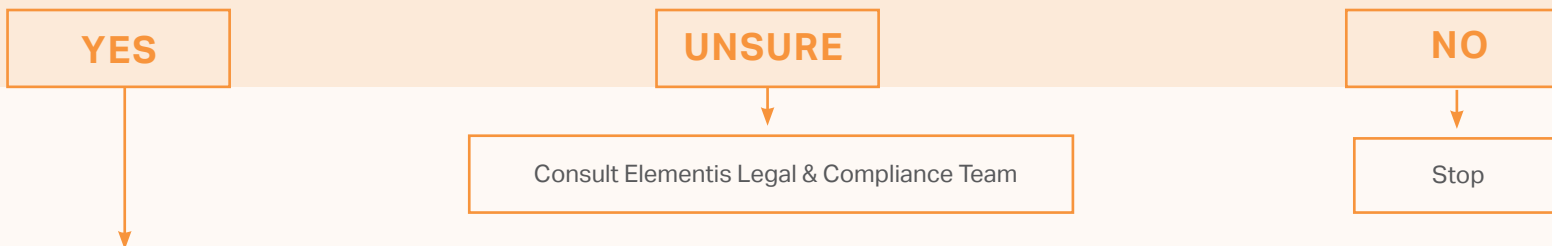
We are all responsible for understanding our Code and our Values. Still, we may find ourselves in situations where the right choice is unclear. In these cases, ask the following questions before acting:

- How do I do the right thing in this situation?
- Which of Elementis' Values might this decision impact?
- What does the Code have to say about this?
- Are there any legal concerns to consider?
- Would there be any negative impacts to Elementis' reputation?

If you are still unsure, use the following Decision Tool to walk through the decision, email [compliance@elementis.com](mailto:compliance@elementis.com) or refer to the [Asking Questions & Raising Concerns](#) section for help and guidance.

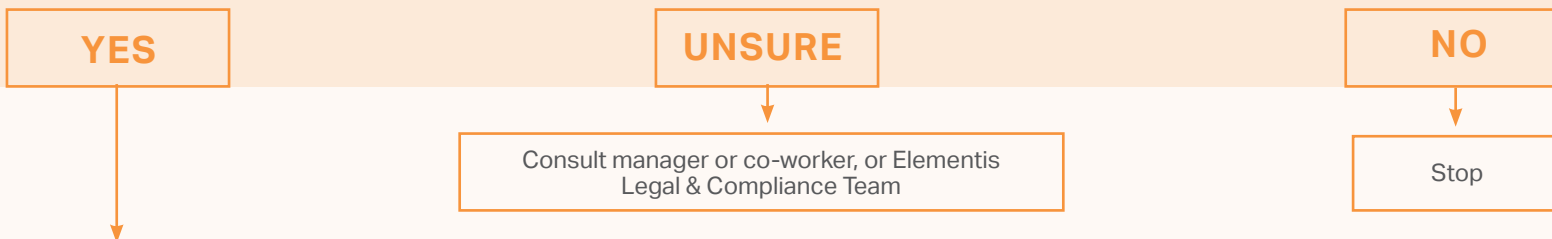
## IS IT LEGAL?

Am I acting in accordance with the law?

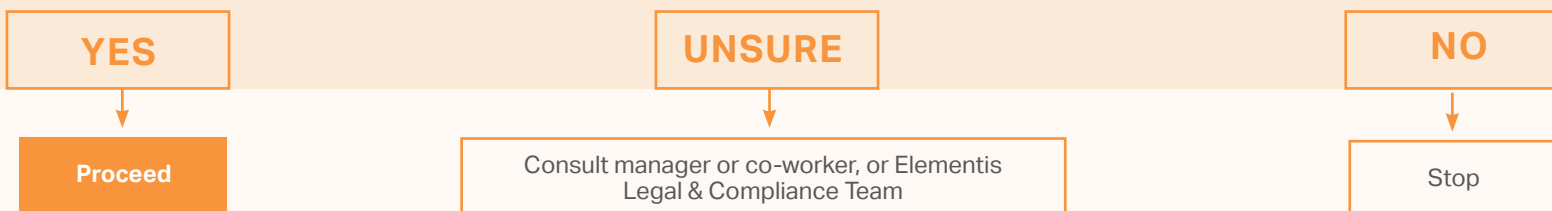


## IS IT ETHICAL AND CONSISTENT WITH OUR VALUES?

Am I acting in accordance with our Values and in line with our Code?



## WOULD I FEEL COMFORTABLE EXPLAINING IT TO MY COLLEAGUES OR FAMILY, OR IF IT APPEARED ON SOCIAL MEDIA OR IN THE NEWS?



# OUR PEOPLE

One of our Values is Respect. We protect our employees' safety, dignity, health and well-being. We comply with the law and behave with integrity towards our employees.

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# WE MAINTAIN A SAFE, HEALTHY AND SECURE WORKPLACE

It is our duty to safeguard the health, safety and security of all employees, contractors and visitors at all of our sites and facilities. We protect the environment and the communities in which we operate. Our goal is to maintain a world-class Health, Safety and Environmental (HSE) program that delivers excellence in HSE performance and drives continuous improvement.



## Why Integrity Matters

Safety is a promise we make to ourselves, our families and each other. Like a family, none of us is truly safe until all of us are safe. Nothing is more important than ensuring our people return home from work to their loved ones alive and well each day.

## How We Maintain a Safe, Healthy and Secure Workplace

We follow all safety laws, rules and practices and take necessary steps to protect ourselves and our colleagues. We attend required safety training and immediately report all accidents, injuries and unsafe practices or conditions. Our employees are encouraged and empowered to take ownership of their safety and that of their colleagues.

Our TogetherSAFE pledge embodies the conduct expected and required of all employees. TogetherSAFE is an extension of our Value of Safety and guides our behaviours at home and at work, follows our products into the marketplace and protects our facilities, our environment and our communities. TogetherSAFE means considering how every decision, every action, every moment may affect others.

Together, we WILL:

- Take the time to learn and practise safety skills and systems
- Speak up when we see something or someone unsafe, no matter what
- Celebrate and nurture our safety culture locally and globally
- Empower every co-worker with stop work safety authority
- Immediately report any accident, injury or safety concern
- Follow all environmental laws and regulations

We DO NOT:

- Put business needs above the health and safety of our employees
- Work while impaired by alcohol, illegal drugs or any other substance
- Punish or seek retribution for speaking up about a safety concern

## Find Out More

Elementis TogetherSAFE program  
Elementis Life Saving Rules



## Stop Work Authority

Elementis employees are empowered with stop work authority, one of our Life Saving Rules. Stop work authority allows any employee or contractor at any level of the organisation to halt a job or task if they feel that harm can result.

# WE EMBRACE DIVERSITY, EQUITY AND INCLUSION

People are unique. We at Elementis strive to create a workplace where all employees belong and feel safe, respected, valued and free to contribute ideas and perspectives. We are an equal opportunity employer. We recruit and hire based solely on a person's ability and potential.

## Why Integrity Matters

Embracing diversity, equity and inclusion is critical to our success. It ensures that we benefit from a wide variety of ideas, perspectives and talents from our team. We all thrive in a diverse workplace where all employees belong, feel safe psychologically and physically, feel respected and valued and are treated in an equitable way.

## How We Embrace Diversity, Equity and Inclusion

We actively promote diversity, equity and inclusion in our workforce, and are committed to organisation-wide equity. We comply with all applicable employment laws everywhere we operate.

### We DO:

- Promote diversity through continuous learning, communication and empowering managers to build inclusive teams
- Encourage inclusion through team discussions and surveys focusing on key areas that drive feelings of inclusivity
- Pay attention to the outcomes of diversity and inclusion initiatives, especially during promotions, recruiting and performance management
- Speak out if we feel our views or those of others are being disrespected
- Listen to the ideas, perspectives and opinions of others

### We DO NOT:

- Disrespect others' points of view, opinions and ideas
- Engage in exclusionary recruiting or hiring practices

## Diversity, Equity & Inclusion Council

The mission of the Elementis Diversity, Equity & Inclusion (DE&I) Council is to lead implementation of initiatives that will more powerfully embed diversity, equity and inclusion into the Elementis culture.

## WE PREVENT HARASSMENT AND DISCRIMINATION

We keep our workplace free from sexual, racial or other unlawful harassment. We never tolerate abusive, harassing or other offensive conduct. This includes verbal, physical and visual harassment, as well as all forms of online harassment, such as email and social media.

### Why Integrity Matters

Harassment and discrimination go against our Values and violate the law. Everyone has a legal right to a respectful workplace. We are motivated to do our best work when our workplace is safe, healthy and productive, both physically and emotionally.

### How We Prevent Harassment and Discrimination

We investigate all complaints about harassment, whether reported verbally or in writing. We conduct investigations as promptly and confidentially as possible.

We DO:

- Always treat one another with fairness, dignity and respect
- Speak up whenever we witness bullying, harassing or offensive conduct
- Make decisions about employees based on objective criteria, such as skills, qualifications and relevant experience

We DO NOT:

- Say or do anything that others may find offensive or degrading
- Sit on the side lines when we witness harassment
- Exclude others from activities due to any characteristic, including those legally protected

### Find Out More

Elementis Non-Harassment Policy

### Examples of Protected Characteristics

The following are examples of protected characteristics:

- Race
- Colour
- Religion
- National origin
- Sex
- Marital status
- Sexual orientation
- Gender identity
- Age
- Disability

### Reporting Harassment

Anyone who believes they have experienced harassment at work should report it. Reports can be made to a manager, Human Resources, the Elementis Legal & Compliance Team or anonymously through the IntegrityCounts Speak Up Line. All reports will be taken seriously and investigated confidentially and sensitively.



# WE RESPECT HUMAN RIGHTS

We prohibit all forms of slavery and are committed to keeping such practices out of our global supply chain. We publish a Modern Slavery Act Transparency Statement every year describing the steps we are taking to tackle slavery, forced labour and human trafficking in our business and our supply chains.

## Why Integrity Matters

The use of forced or child labour is against the law and is an affront to our Values. Preventing modern slavery and protecting human rights is fundamental to how we operate.

## How We Respect Human Rights

We do not tolerate forced or child labour in our workplace or in our global supply chain.

We DO:

- Clearly communicate our human rights policies to all suppliers
- Take action to make sure our suppliers, partners and customers comply with those policies
- Raise concerns about modern slavery and other human rights abuses in any part of our supply chain

We DO NOT:

- Force anyone to work through threats or abuse, whether mental or physical
- Tolerate placing physical constraints or restrictions on anyone in our supply chain

## Find Out More

[Elementis Human Rights Policy Statement](#)

## Examples of Modern Slavery

Slavery is a violation of a person's basic human rights. All forms of slavery are prohibited by Elementis. Examples of slavery include:

- Human trafficking
- Forced labour
- Sale and exploitation of children

# WE SAFEGUARD PERSONAL DATA

Each of us has the right to keep certain information private. We are committed to protecting our employees' and third parties' personal information.

## Why Integrity Matters

Respect for our team, suppliers, partners and customers means respecting their right to privacy. Sometimes we must collect, use, store and disclose personal information. We always do so safely and responsibly, in compliance with the highest standards of data protection laws everywhere we operate, to safeguard the security, integrity and confidentiality of personal information.

## How We Safeguard Personal Data

We comply with all data privacy laws, rules and regulations wherever we do business.

We DO:

- Collect and use personal information only to follow the law or enable business operations
- Use personal information which is necessary and not excessive
- Secure any personal information we need to store, access or share
- Ensure personal information is accurate and up to date

- Provide information on how we use personal information
- Employ "need to know" principles for access to personal information
- Recognise our accountability and duty of confidentiality for the personal information we process

We DO NOT:

- Share personal information with anyone without the data subject's permission or a legal basis
- Retain personal information for longer than necessary

## Find Out More

Elementis Data Protection Policy  
 Elementis Clear Desk and Clear Screen Policy  
 Elementis Remote Working and Removable Media Policy

## Examples of Personal Data

Personal data is any information that directly or indirectly identifies someone. Types of information considered personal include:

- Employment
- Medical
- Financial
- Education
- Training



# OUR COMPANY

Our high standards of integrity and ethics set us apart in all our business dealings. Whenever we represent Elementis, we do so honestly and clearly.

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# WE COMMUNICATE CLEARLY AND PROFESSIONALLY

We communicate clearly, accurately and professionally whenever we do business. We speak for Elementis clearly and with one voice, and only in the areas where we are specifically authorised to represent Elementis as part of our job.

## Why Integrity Matters

Our many stakeholders, including our employees, customers and other parties, deserve clear and accurate information about our company. Maintaining high standards of communication keeps our business honest and protects our reputation.

## How We Communicate Clearly and Professionally

We do not send false or mixed messages to the media, customers or the public. This includes communication on social media.

We DO:

- Provide accurate information to all our stakeholders
- Only speak on Elementis' behalf if specifically authorised to do so
- Remember that statements made on social media can be easily copied and shared

We DO NOT:

- Falsely market any of our products or services
- Speak to the press about the company without prior agreement with the Communications Director, the Investor Relations Director and the Group General Counsel and Chief Compliance Officer
- Represent our personal views as those of Elementis

## Find Out More

Elementis Media Relations Policy  
Elementis Social Media Policy

## Handling Media Requests

If contacted by a member of the media, all employees should:

- Refer the journalist to the Communications Director, the Investor Relations Director or the Group General Counsel and Chief Compliance Officer and decline to give them any information
- End the conversation as quickly and politely as possible

## WE DISCLOSE AND RESOLVE CONFLICTS OF INTEREST

Acting with integrity means recognising situations where competing interests exist and may impair our ability to make objective decisions in the best interests of Elementis.

### Why Integrity Matters

Even a seeming conflict of interest can hurt our people, reputation and standing in the marketplace. We are committed to avoiding these conflicts wherever possible. When conflicts do arise, we report them immediately.

### How We Disclose and Resolve Conflicts of Interest

Sometimes a conflict arises in spite of our best efforts. We must immediately report these to the Elementis Legal & Compliance Team as set out in the Conflicts of Interest Policy.

We DO:

- Watch for cases where our personal ties could affect, or could appear to affect, our objectivity
- Declare all potential conflicts of interest
- Ask the Elementis Legal & Compliance Team if we are unsure whether a conflict exists
- Remove ourselves from deciding on how to resolve a conflict that involves us

We DO NOT:

- Make decisions based on favouritism
- Let a close relative or friend be placed in a reporting relationship to us
- Hire someone with whom we have a close personal or family relationship
- Engage in selecting a business partner who is, or who employs, a close personal friend or relative

### Find Out More

[Elementis Conflicts of Interest Policy](#)

### Examples of Conflicts of Interest

The following are examples of conflicts of interest that require disclosure and resolution:

- Holding significant shares or other financial interest in Elementis' competitors, customers or suppliers
- An employee or an employee's family member creating a company that competes with Elementis
- Holding a second job or position, including serving on a board of directors or lecturing at a university
- Seeking election or appointment to public office



# WE SAFEGUARD CONFIDENTIAL AND PROPRIETARY INFORMATION

Each of us is responsible for protecting Elementis' confidential information. We protect our own intellectual property (IP) rights and respect those of others.

## Examples of Confidential Information

Information may be considered confidential if:

- It might benefit competitors, be repeated in the media or harm Elementis or our customers, if disclosed
- It is about Elementis' financial condition, prospects or plans
- It is about possible transactions with other companies
- It concerns our future product ranges, production plans, customers, suppliers or joint venture partners
- It is non-public information about business discussions among employees, officers and directors
- It is non-public information about fellow employees

## Why Integrity Matters

Protecting confidential information from misuse or improper disclosure protects our business and our reputation. Acting with integrity includes taking care with information that should not be made public.

## How We Safeguard Confidential and Proprietary Information

We protect our own and others' intellectual property.

We DO:

- Seek and follow the advice of the Elementis Legal & Compliance Team on privileged communications and materials
- Use correct Elementis trademark and copyright notices on all correspondence, articles and manuals

- Take action against third parties who infringe Elementis' IP
- Keep our confidentiality obligations to third parties under commercial agreements, employment contracts and applicable law

We DO NOT:

- Make prohibited copies of data files, software or publications
- Receive or seek access to confidential material unless appropriately authorised
- Infringe third-party IP

# WE SAFEGUARD OUR INFORMATION SECURITY ENVIRONMENT

The data Elementis owns and controls is among our most valuable assets. Each of us is tasked with protecting it properly.

## Why Integrity Matters

A security breach or leak could seriously impair our business processes, impacting our ability to deliver our products and services to customers. A breach or leak could also damage our reputation and lead to serious legal outcomes.

## How We Safeguard Our Information Security Environment

We use our computing resources in a safe and ethical manner.

We DO:

- Contact the IT Team if we have any doubts about the legitimacy of any email or links
- Provide authorised users with access only to the systems and data needed to do their jobs
- Choose strong passwords, change them regularly and never share them with others
- Keep computer equipment safe and secure at all times, on and off company premises
- Make sure that any company data stored on removable media is maintained securely

We DO NOT:

- Open suspicious email attachments or follow questionable links
- Use personal email or apps to conduct Elementis business
- Abuse the privilege of limited personal use of company technology
- Make copies of data files onto unauthorised devices

## Find Out More

[Elementis Global Computer Use Policy](#)

[Elementis Social Media Policy](#)



# WE DO NOT PARTICIPATE IN INSIDER TRADING

Insider trading is a criminal offence in many countries where Elementis operates. We conduct share trading with honesty and transparency. We do not trade in Elementis shares (or other financial instruments) when we have inside information or disclose inside information inappropriately. Elementis is listed on the London Stock Exchange and follows all UK Financial Conduct Authority regulations.



## What Is Inside Information?

Inside information is any confidential information of a precise nature that has not been made public and, if made public, would likely be considered important by investors. If you have access to certain information and use it or disclose it to someone else in order to gain unfair benefit in the marketplace – for example, to buy or sell stocks or shares or influence their price before others know what you know – it's called 'insider trading.'

## Why Integrity Matters

Insider trading could seriously harm our reputation. We comply with laws in all countries where we do business restricting share trading by anyone in possession of inside information. This keeps trading fair and honest for all and helps prevent market abuse.

## How We Avoid Insider Trading

We DO:

- Maintain a list of employees with access to inside information; we may be required to disclose this list to regulatory authorities
- Observe restrictions on share dealing and seek advance clearance where required to deal in Elementis shares
- Talk with the Group Company Secretary when in doubt about any interactions involving inside information

We DO NOT:

- Use inside information for personal gain, e.g., by dealing in Elementis shares when in possession of inside information or asking another person to do so on our behalf
- Disclose inside information to others without prior agreement with the Group Company Secretary

## Find Out More

Elementis Share Dealing Policy  
Elementis Share Dealing Code  
Elementis Disclosure Policy

## WE KEEP ACCURATE ACCOUNTS AND RECORDS

Acting with integrity means being honest and transparent. Our stakeholders, including shareholders and government agencies, depend on us to provide fair, accurate and timely financial and business records. The law and accounting standards require this as well.

### Why Integrity Matters

Providing inaccurate business records is a serious violation. We maintain accurate and complete records of our business dealings, including sales, product testing, purchasing of goods and services, environmental and operational information, and attendance records.

### What Should I Do?

If we suspect that Elementis records are being improperly altered or destroyed, we **must report** this to the Group General Counsel and Chief Compliance Officer immediately.

### How We Keep Accurate Accounts and Records

We DO:

- Document all business activities accurately and promptly
- Comply with the Records Retention Procedures
- Comply with relevant accounting principles and laws in all the countries in which we operate

We DO NOT:

- Delete business records other than in accordance with the Records Retention Procedures
- Destroy any document pertaining to a lawsuit, investigation or audit
- Alter any document to damage its integrity or prevent its use in an official proceeding

### Find Out More

Elementis Records and Retention Schedule



# WE COMBAT MONEY LAUNDERING

Elementis does not participate in money laundering schemes, nor do we do business with third parties who do. Any form of money laundering or other financial wrongdoing violates the law as well as our Values.

## Why Integrity Matters

It is our duty to stay alert for any signs of money laundering by understanding whom we are doing business with and monitoring for any changes in practices which might require further investigation.

## How We Combat Money Laundering

We take all necessary steps to ensure all our business partners' activities and funds are legitimate and not used to support illegal activities.

We DO:

- Watch for activities that could indicate money laundering
- Understand and follow all our anti-money laundering policies, procedures and internal controls

We DO NOT:

- Do business with any partner we know, or suspect, is engaged in money laundering
- Do business with any party that we know or suspect to be involved in, or providing financial support to, illegal activities

## Find Out More

Elementis Anti-Corruption Policy  
Elementis Anti-Money Laundering Policy

## Possible Signs of Money Laundering

Money laundering is an attempt to make illicit funds seem legitimate. Signs of money laundering include:

- Making unusually large payments or unexpected payments using cash equivalents (e.g., cashier's cheques and money orders)
- Requests for payments to unconnected third parties, different accounts or locations
- Making a large payment, then asking for a refund in a form different from the payment first used



# WE DO NOT FACILITATE TAX EVASION

Elementis does not engage in, nor does it facilitate, tax evasion.

## Why Integrity Matters

Tax evasion is against the law. It deprives communities of funding for basic services that improve quality of life for everyone. Preventing tax evasion is an important part of our commitment to doing business with integrity. By preventing tax evasion, we safeguard our financial viability and protect our reputation.

## How We Combat Tax Evasion

We follow the policies in place to detect and prevent tax evasion by Elementis' employees and business partners.

We DO:

- Follow Elementis' policies, procedures and internal controls in place to prevent tax evasion
- Document all expenses accurately and completely
- Stay alert to warning signs or 'red flags' of potential tax evasion

We DO NOT:

- Make cash payments to anyone under any circumstances
- Do business with customers, suppliers or other third parties without appropriate integrity due diligence
- Enter false or misleading information related to someone's employment status

## Find Out More

Elementis Anti-Facilitation of Tax Evasion Policy  
Elementis Tax Governance Statement

### 'Red Flags' for potential tax evasion

The following are examples of 'red flags' or warning signs of tax evasion:

- Requests for payment in cash
- Payments to unrelated accounts or locations
- Payments to unconnected third parties
- Incomplete descriptions of financial transactions





# WE PARTICIPATE IN THE POLITICAL PROCESS RESPONSIBLY

We respect the political process and treat it with integrity. We do not make prohibited political contributions on behalf of Elementis.

## Why Integrity Matters

Many of the countries where we do business have strict rules about corporate contributions to political campaigns and parties: we must abide by all relevant laws. We do not generally make such contributions on behalf of Elementis and specific internal approvals are required. As individuals we can engage in political activity in our personal capacity but must make it clear our views are our own, not those of Elementis.

## How We Participate in the Political Process Responsibly

We follow all applicable laws on political contributions. This may include political action committees established and run in accordance with applicable laws. We avoid political conflicts at the individual and company levels.

### We DO:

- Make clear that our personal views are our own and not those of Elementis
- Conduct all political activities on our own time, away from work and at our own expense

### We DO NOT:

- Use corporate resources for political activity or fundraising
- Reimburse any employee for any kind of political contributions
- Use political donations to obtain an improper influence or advantage

## Find Out More

[Elementis Anti-Corruption Policy](#)

# OUR CUSTOMERS, SUPPLIERS & OTHER THIRD PARTIES

As a leading global specialty chemicals business, we succeed based on our commitment to our relationships with our key stakeholders. We do business fairly and honestly. Even when the law does not require it, we always do what is right.

We are committed to the highest standards of social and environmental responsibility and ethical conduct. We expect the same level of commitment from our customers, suppliers and other third parties with which we do business.

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# WE PREVENT BRIBERY AND CORRUPTION

We never exchange money or anything of value to gain or keep business or to gain an unfair business advantage. We avoid unfair or unlawful exchanges of money, gifts and hospitality.

## Why Integrity Matters

Using bribes violates our Values, the law and the integrity of our operations. We follow anti-bribery and corruption laws everywhere we do business.

## How We Prevent Bribery and Corruption

We never engage in bribery. We do not create the appearance of improper influence by exchanging money, gifts or hospitality other than as permitted under the Elementis Gifts & Entertainment Policy.

We DO:

- Follow company policy on giving and receiving gifts and entertainment, ensuring these are never excessive or lavish, or otherwise capable of causing embarrassment
- Keep accurate and complete records of any gifts and entertainment offered or received
- Report any concern about a potentially improper payment to the Group General Counsel and Chief Compliance Officer

We DO NOT:

- Give or promise anything of value to a government official to gain a business advantage
- Offer or accept bribes, inducements, facilitation payments, payments in kind or kickbacks to give or receive business
- Use an agent or other third party to make improper payments on our behalf or create the impression that any such payments are acceptable to Elementis

## Find Out More

Elementis Anti-Corruption Policy  
Elementis Travel & Expense Policy  
Elementis Gifts & Entertainment Policy

## Examples of Bribes

To bribe is to offer or pay money or anything of value to gain an improper business advantage.

Examples of bribes include:

- Direct payments
- Indirect payments (for example, through agents or contractors)
- Lavish or frequent gifts and/or entertainment
- Certain travel expenses

## WE GIVE AND RECEIVE GIFTS AND ENTERTAINMENT RESPONSIBLY

Strong ties with our customers and partners are important to our success. In some cases, it may be appropriate to exchange reasonable entertainment or modest gifts. Exchanging hospitality and gifts can build goodwill and strengthen business ties, but we must never allow such courtesies to keep us from making objective business decisions. Our success must come from the value of our products and services, our integrity and our strong reputation.

We DO accept gifts that:

- Are for a proper business purpose and within the limits set out in the Elementis Gifts & Entertainment Policy
- Have been pre-approved where required under the Elementis Gifts & Entertainment Policy and are appropriate under the circumstances

We DO NOT:

- Ask for gifts
- Accept cash, gift cards or cash equivalents
- Accept gifts unless they are nominal in value and given infrequently

### Find Out More

[Elementis Gifts & Entertainment Policy](#)



# WE COMPETE HONESTLY AND FAIRLY

Elementis competes vigorously but fairly and lawfully. We rely on our strengths to succeed in the marketplace that benefits our customers. We do not seek unfair or illegal advantages over competitors.

## Examples of Anti-Competitive Agreements

Competition laws apply to Elementis' agreements with our customers and distributors.

Making arrangements with competitors can break the law. Problematic agreements with competitors include:

- **Price fixing:** agreement on prices to charge customers
- **Market division:** splitting up regions or tiers of customers

Problematic agreements include:

- **Resale price maintenance:** requiring a distributor or customer to resell at or above a certain price

## Why Integrity Matters

We are committed to complying with competition laws, which exist to protect fair competition in markets and prevent anti-competitive conduct by organisations and individuals.

## How We Compete Honestly and Fairly

We make sure our business practices fully comply with competition laws everywhere we do business.

We DO:

- Take care when sharing commercially sensitive information
- Ensure our agreements do not violate competition laws in letter or spirit
- Contact the Elementis Legal & Compliance Team when in doubt about any interactions

We DO NOT:

- Share pricing, strategy or other sensitive information with competitors
- Make agreements with competitors, customers or distributors that could directly or indirectly harm fair market practices

## Find Out More

Elementis Competition Law (Antitrust) Policy

## WE COMPLY WITH INTERNATIONAL TRADE LAWS

As a global company, we value our strong relations with international partners and markets. We make sure we know and follow all applicable laws wherever we do business.

### Why Integrity Matters

Domestic and foreign trade laws exist to ensure international transactions are fair and ethical. We follow these laws in all the countries where we do business.

### How We Comply with International Trade Laws and Export Controls

We make sure all our business transactions follow international, foreign and domestic laws applicable to the cross-border trade of goods and services.

We DO:

- Consider all applicable export licensing requirements, end use restrictions, sanctioned individuals, countries, groups or entities, before we commit to trade

We DO NOT:

- Purchase, sell or distribute anything internationally without first confirming the regulations

### Find Out More

Elementis Sanctions and Export Controls Policy



OUR VALUES &  
CORE PRINCIPLES

OUR CODE

OUR PEOPLE

OUR COMPANY

OUR  
CUSTOMERS  
& SUPPLIERS

OUR  
COMMUNITIES  
& THE  
ENVIRONMENT

ASKING QUESTIONS  
& RAISING CONCERNS

# WE ENSURE OUR SUPPLIERS UPHOLD OUR HIGH STANDARDS

Our high ethical standards extend beyond our own company. They also apply to the suppliers with whom we do business and their supply chains. We choose to partner with suppliers who share our commitment to supply chain transparency and responsible business.

## Why Integrity Matters

Working with suppliers who do not share our high standards could damage our reputation and the trust we have built with our customers.

## How We Ensure Our Suppliers Uphold Our High Standards

We build strong partnerships with suppliers who share our Values.

We DO:

- Choose partners who provide transparency as to their supply chains and the processes that ensure responsible and sustainable business practices throughout those supply chains
- Make objective decisions based on quality, price, service, sustainability and responsible business practices

We DO NOT:

- Tolerate modern slavery or any other human rights abuses in our supply chain
- Share another company's confidential information without permission
- Choose partners who engage in illegal trade operations or make illicit payments
- Build relationships with suppliers by any improper means
- Choose partners who show disregard towards environmental damage from their own operations or supply chains





# OUR COMMUNITIES & THE ENVIRONMENT

Our success depends on our healthy cooperation with communities and the environment, which support our work and help our people thrive. As responsible global citizens, we are committed to community support, environmental integrity, and product safety and quality – everywhere we do business.

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# WE CONTRIBUTE TO OUR COMMUNITIES

We serve the global community every day through employment at our various facilities and the products and services we provide. We seek to give back to local communities however we can.



## Why Integrity Matters

Building strong relationships with the communities where we live and work helps ensure our business success. Giving back to local communities is not only in our best interests – it is also the right thing to do.

## How We Contribute to Our Communities

We give back to our communities in various ways:

- Volunteering in the places where we do business
- Following proper channels before donating on behalf of Elementis
- Encouraging employees to participate in charity work

## WE PROTECT THE ENVIRONMENT

Respect for our environment is central to our Values. We strive for excellence in protecting the environment and have set clear goals to reduce greenhouse gas emissions, resource use and waste.

### Why Integrity Matters

Following environmental laws is our minimum standard. We go beyond these basic requirements because we know protecting the environment is the right thing to do.

### How We Protect the Environment

We follow all rules and regulations as a minimum standard. Beyond that, we consider the impacts of our decisions and activities on the environment and our sustainable business targets and follow our policies to reduce emissions, resource use and waste.

We DO:

- Seek to reduce environmental impacts of our business
- Encourage innovation with our partners to understand and lower environmental impacts across our entire value chain
- Report any spills, leaks or accidental discharges to a manager immediately
- Follow company policies, plans and targets for waste management, recycling and responsible energy use



We DO NOT:

- Accept complacency towards the environmental impacts of our business

### Find Out More

Elementis Health, Safety and Environment Policy

# WE PROMOTE SUSTAINABILITY

We are committed to doing our part to furthering sustainability in all our activities. We strive to ensure we meet the needs of the present without compromising the ability of future generations to meet their own needs. This applies to the way we run our business and to the benefits our products bring to our customers and society.

## Why Integrity Matters

We know that our own short- and long-term success goes hand in hand with our contribution to ensuring a thriving environment and a just society for generations to come. Sustainability is central to the work we do.

## How We Promote Sustainability

Our business strategy incorporates long-term sustainability goals focused on delivering positive environmental and social impacts around the globe. We are a proud member of the United Nations Global Compact (UNGC), and issue an annual statement reflecting our progress towards furthering the UNGC aims.

We DO:

- Consider the impacts of our actions, products and services on a variety of stakeholders
- Ensure we work to understand and mitigate any unintended consequences of our business decisions

- Maintain data and records of how sustainability considerations are incorporated into our business decisions
- Communicate transparently with stakeholders about our approach to areas of sustainability relevant to them
- Work in partnership with other organisations (such as industry partners, governments, NGOs) to maximise our progress on sustainable development

We DO NOT:

- Communicate our product and business impacts in a biased or incomplete way (also known as greenwashing or greenwashing)
- Ignore stakeholder input or feedback, even if at odds with our approach
- Assume the solutions we have today are relevant solutions for tomorrow

## Find Out More

[Elementis Health, Safety and Environment Policy](#)

# WE DELIVER SAFE AND HIGH-QUALITY PRODUCTS AND SERVICES

Our goal is to make sure our products make the world a better place. We create meaningful relationships throughout our supply chain to ensure safety and promote understanding of hazards and our impact on the environment.

## Why Integrity Matters

We believe that all our products must be used responsibly and safely. Knowing and communicating the risks is crucial to ensure our products do not have a negative impact on people or the planet.

## How We Deliver Safe and High-Quality Products and Services

We test our products thoroughly and honestly. We make sure all our products follow applicable laws and necessary requirements and test procedures. Through product stewardship, we review every aspect of our products' lifecycle and assess the impact to human health and the environment at every step of the process.

We DO:

- Use complete and proper inspection and testing protocols and procedures
- Correctly record all inspection and test results
- Collaborate with like-minded companies to ensure market needs are met consistently and responsibly
- Use best available and state-of-the-art methods and techniques to assess our products in the most robust way possible before allowing them to be transported to customers
- Seek to minimise any hazards associated with our products

We DO NOT:

- Tamper with any inspection or test document or software
- Falsely claim that inspections or tests were performed
- Ignore the inherent risk and warning signs that can accompany our products
- Allow products to be sold without the appropriate communication of hazards
- Allow a product to be sold for the sake of a sale – all relevant compliances are checked before the product leaves our control



# ASKING QUESTIONS & RAISING CONCERNS

We value open and honest communication and encourage our employees and partners to report any concerns.

If we become aware of something which may be unethical, unlawful or in violation of this Code or any other Elementis policies, it is always best to ask a question or raise a concern as it arises.

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## QUESTIONS AND CONCERNS

Sometimes we may be unsure of the best course of action in a situation. This Code provides guidance on a range of subjects, but if you are still unsure what to do, there are a number of resources that can help:

- Generally, your manager should be your first point of contact (unless you feel unable to speak to your manager)
- Human Resources (HR)
- Other Elementis functions (such as HSE and Finance)
- Legal & Compliance ([compliance@elementis.com](mailto:compliance@elementis.com))
- IntegrityCounts Speak Up Line <https://integrity-counts.com/org/elementis>

## INTEGRITYCOUNTS SPEAK UP LINE

If you do not feel able to raise the matter with anyone at Elementis, it may be raised confidentially and anonymously to the IntegrityCounts Speak Up Line. This service is hosted independently of Elementis and is available 24 hours a day, 7 days a week, in multiple languages.

- 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 asking a question or raising a concern by completing an online form or by telephone.

### What Happens When I Report an Issue?

Elementis will investigate all reports we receive at the direction of the Group General Counsel and Chief Compliance Officer or a local delegate. We will take all required steps based on the outcome of the investigation. **We will make every effort to investigate reports confidentially, disclosing information only where necessary.**

### Elementis Does Not Tolerate Retaliation

Any employee who reports a violation in good faith will be protected from retaliation. This applies even if the report does not hold up in an investigation. 'Good faith' means that the reporter reasonably believes in the truth of the report and is not acting maliciously. Retaliation will result in punitive action up to and including termination of employment.

### Find Out More

Elementis Whistleblowing Policy

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**SAFETY**



**SOLUTIONS**



**AMBITION**



**RESPECT**



**TEAM**