



Reliable. Sustainable. Resourceful.

CODE OF CONDUCT

Integrity is the fundamental principle of our way to do business
Our fundamental principle of doing business is integrity



At Vynova, we are...



Reliable

We aim to be a strong and reliable partner for our customers, suppliers and for the communities in which we operate our businesses.

Sustainable

We embrace sustainability, balancing economic success with social and environmental responsibility.



Resourceful

Our experienced teams are committed to positively impact our customers' business needs and help them turn challenges into opportunities for growth and innovation.

Contents

President Message	4
Introduction	6
1. Integrity	7
2. Product Quality	7
3. Safety & Health	7
4. Environmental Impact	8
5. Employee Fair Treatment & Human Rights	8
6. Gifts & Entertainment	9
7. Corruption	10
8. Donations and Sponsorships	10
9. Conflicts of Interest	10
10. Fair Competition	11
11. Foreign Trade and Trade Controls	11
12. Money Laundering	12
13. Transparency	12
14. Corporate Assets & Intellectual Property	13
15. Confidential Information	13
16. Data Protection	13
17. Electronic Means of Communication	14
18. Social Media and Media Relations	14

President Message

Dear Colleagues,

Vynova brings together colleagues from many different backgrounds working at our different sites and legal entities in a common organization across the world. Our products play a key role in manufacturing numerous industrial products and consumer goods that improve our quality of life.

Our way of doing business is a key factor for our reputation. Vynova wants to be seen as a top performing company i.e. as a reliable and integral partner of our stakeholders worldwide.

We are certain that sustainable business success and compliance with laws, regulations, and ethical standards are closely linked. Therefore it is crucial, that we operate with a common understanding of fundamental behaviors.

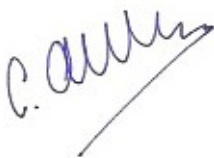
This firstly relates to our external contacts: customers, suppliers, authorities, neighbors and other stakeholders must be certain that we will always fulfill our business responsibilities, irrespective of the particular site and legal entity they are currently in contact with.

But internally too, accepted rules of behavior make us stronger as a team and ultimately ensure that we reach our joint objectives as an organization. This applies both to the supervision of customer projects and products spanning a number of entities across the network and to the managerial approach taken by line managers.

This Code of Conduct outlines the fundamentals essential for achieving these results. Please read the document carefully and let these rules be the principles guiding your daily work routine. You'll be helping to ensure that Vynova and its personnel are regarded as trustworthy partners around the world.

Thank you for taking responsibility by following this Code of Conduct and living its principles.

Yours sincerely,



Christophe André

President Vynova Group

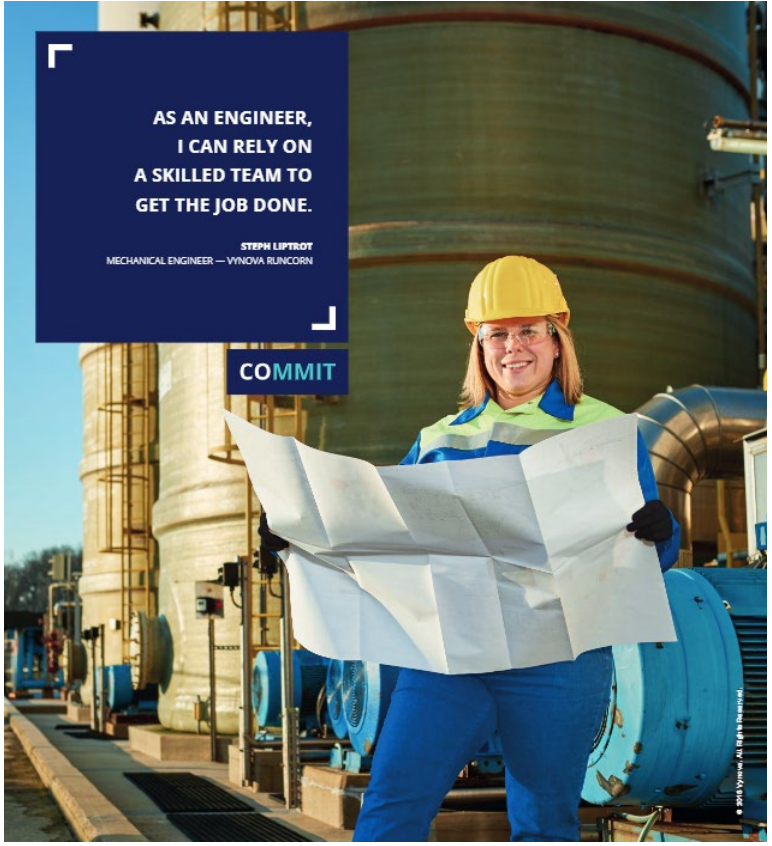




I'M MEETING WITH CUSTOMERS AND COLLEAGUES ALL THE TIME. SHARING EXPERIENCES AND LISTENING ARE IMPORTANT PARTS OF MY JOB.

JOERI VASTMANS
AREA SALES MANAGER POTASSIUM DERIVATIVES

CONNECT



AS AN ENGINEER, I CAN RELY ON A SKILLED TEAM TO GET THE JOB DONE.

STEPH LIPIROT
MECHANICAL ENGINEER — VYNOVA RUNCORN

COMMIT



WE'RE CONTINUALLY IMPROVING THE QUALITY OF OUR PRODUCTS. THE BETTER OUR PRODUCTS, THE BETTER IT IS FOR OUR ORGANISATION.

YOHAN VERGNIES
PVC PILOT PLANT OPERATOR — VYNOVA MAZINGARBE

IMPROVE



WORKING TOGETHER IN AN OPEN AND RESPECTFUL WAY: THAT'S WHAT MAKES VYNOVA A GREAT PLACE TO WORK.

LOU VAN HEEB
DEPUTY SHIFT SUPERVISOR — VYNOVA BEEK

RESPECT

- An organisation that's built on **connections** between people.
- An organisation where we **respect** each other and our surroundings.
- An organisation where people are **committed** to delivering quality results.
- An organisation where continuous **improvement** is key.

That's our kind of organisation. **Our Vynova.**



Introduction

This Code of Conduct is intended to support you as an employee at Vynova to behave in a legally and ethically irreproachable manner in your daily work routine. It is part of our comprehensive Compliance Management System (CMS).

We base our daily actions on the following core values. At Vynova we are an organisation

- that is built on connections between people (CONNECT)
- where people are committed to delivering quality results (COMMIT)
- where continuous improvement is key (IMPROVE)
- where we respect each other and our surroundings (RESPECT)

Based on these core values, the Code of Conduct creates mandatory principles. These principles are all-inclusive: it defines the fundamental ethical and professional standards that we expect of all individuals working for Vynova.

All managers and employees (all together «employees») worldwide must ensure that their conduct in carrying out their duties is in line with this Code of Conduct and with applicable laws and regulations. Managers must ensure that the staff reporting to them are familiar with the content of this document.

We fundamentally trust the overall professionalism and integrity of our personnel. This document should therefore not be viewed as a detailed set of instructions covering every eventuality, but instead as a framework to guide reasonable behavior.

If, on a case-by-case basis, laws, internal group or site regulations or labor law agreements define requirements which go beyond the rules of this Code of Conduct, these requirements are to be viewed as binding. If, on the other hand, the Code of Conduct or other internal requirements of Vynova set requirements which are more stringent than those defined by law, the internal guidelines will take precedence.

The Group Compliance Manager at Group level coordinates any activities associated with this Code of Conduct and is available at any time to offer expertise and support. Relevant training is offered to all employees on a regular basis and upon demand if needed. If there is any doubt, advice from the Group Compliance Manager should always be obtained.

Even possibly minor breaches of this Code of Conduct by employees can materially affect Vynova's reputation and give rise to major harm, including financial harm. All Vynova employees are obliged to comply strictly with the provisions of the Code of Conduct. Management serve as role models in this respect.

If you have reason to believe that this Code of Conduct has been or is being violated, it is your responsibility to immediately raise this with the appropriate person, such as your supervisor or the Group Compliance Manager. Complete confidentiality and anonymity is ensured. Retaliation against anyone who raises a concern honestly and with good intentions is not tolerated. A fully anonymous reporting system, a so-called Whistle Blower System is available as well. Details can be found on the Vynova Intranet (for employees only) , as well as on our Vynova website www.vynova-group.com.

If proven, violations may lead to disciplinary measures up to and including dismissal in the context of applicable labor laws.

The Code of Conduct applies worldwide to all personnel within the Vynova Group, irrespective of organizational unit, hierarchical level or geography.

1. Integrity

Vynova considers itself and its employees as reliable, trustworthy business and contractual partners. Our activities are determined by integrity. We will operate to the highest standards of ethics and respect the cultural diversity of the markets in which we operate.

An essential principle is compliance with the prevailing law and the regulations in every country where Vynova is active. We observe the laws and regulations applicable to our business worldwide, as well as ethical framework conditions. The Vynova management acts as role model in following this Code of Conduct. All employees of Vynova have to obey the laws and regulation of the country in which they are operating and the Vynova policies.

Our suppliers and other business partners who are working on our behalf or acting in our name, through outsourcing of services, processes or any other business activity, are requested to follow this Code of Conduct.

In particular, we expect our business associates, like us, to recognize and comply with the ten principles of the United Nations (UN) Global Compact, as well as with the principles of the International Labour Organization (ILO) – the right to freedom of association and collective bargaining, the abolition of child and forced labor and the prohibition of discrimination in the workplace.

2. Product Quality

We pursue professional quality management and a global quality system with the claim that our products and solutions always fulfill or exceed customers' and regulatory expectations. For the quality and safety of our products, we have high requirements in place throughout the entire production process.

We provide adequate information to everyone involved to ensure that our products are safe during production, handling and transport. Legislative and internal product quality must be followed at all times.



3. Safety & Health

Our employees are our most valuable asset. Their skills, competence and creativity, and their willingness to accept change, continuously open up new growth opportunities for our company. For Vynova it is important that employees operate in a positive and safe work climate in which they can develop their capabilities.

As a group active in the chemicals sector, we uncompromisingly meet our particular responsibilities in terms of plant and occupational safety. Management provides suitable processes to ensure that buildings, plants and other facilities fulfill all relevant safety criteria. The same applies to our personnel's working environment and conditions. We always completely comply with all legislative and other requirements in this respect.

Within their personal working environment, each individual bears joint responsibility for protecting themselves, colleagues and the environment by behaving safely. Safety guidelines such as operating rules, handling instructions, dress codes or traffic regulations must be followed at all times. In order to continuously raise safety levels, all members of staff are encouraged to report any safety shortcomings and proactively suggest improvements.

4. Environmental Impact

Vynova is committed to treating the world's resources with respect and care. This, of course, includes compliance with regulations safeguarding the protection of the environment and promoting sustainability. We use natural resources as efficiently as possible in all operating procedures and minimize emissions and waste volumes.

We achieve this by using technical solutions as well as smart processes and work procedures. Environmental legislation, regulations and work instructions are strictly followed.

We furthermore encourage all members of staff to minimize the environmental impact of their personal behavior in their daily work routine. We strive to minimize raw material and energy consumption in all our processes.

Accidents or malfunctions nevertheless occur. It is Vynova's aim to initiate the appropriate hazard prevention and damage repair measures as quickly and effectively as possible. Accordingly, the relevant internal contact persons and authorities should be informed immediately. In general, commercial use of air, water, and land is permitted only within the terms of a permit issued beforehand. The same applies to the erection and operation of production plants and to their alteration or expansion.

Any unauthorized release of substances must be avoided. Waste must be disposed of in accordance with the legal provisions. If the services of third parties are utilized, it must be ensured that they also comply with the environmental regulations and our standards within the company.



5. Employee Fair Treatment & Human Rights

We consider ourselves bound by the Universal Declaration of Human Rights and the principles of the International Labour Organization (ILO). We are categorically opposed to child and forced labour. Vynova will not engage in or support the use of corporal punishment, mental or physical coercion, and verbal abuse. All members of staff are entitled to fair, unprejudiced and respectful treatment.

The knowledge, abilities and motivation of our colleagues are the foundation of our long-term business success. Therefore, we put structures and processes in place to enable employees in every entity to develop both professionally and personally within Vynova. All managers have a responsibility to support the members of their teams in achieving this.

We respect the right of our personnel to join unions and/or other employee organizations and to bargain collectively. Members of staff are protected from discrimination and receive the support they require to perform their function.

We provide a working environment which is free of discrimination, bullying and harassment. We do not tolerate staff or colleagues being disparaged on the basis of their race, skin color, language, gender, religion, political or other outlooks, age, sexual orientation or other personal features, whether in direct contact, written communication, electronic, verbal, or any other form. The same applies to harassment, in particular of a sexual nature. Sexual harassment is defined as all behavior with a sexual element that is unwelcome and degrading to the affected employee.



Our managers have a duty to put a stop to and take disciplinary actions. We do not tolerate bullying or mobbing, the deliberate exclusion and degradation of an employee. Bullying/Mobbing means a systematic, sustained, or repeated hostile behavior with the purpose of isolating or excluding an individual at the workplace or of isolating him or her from the workplace altogether.

We will take all reasonable measures to prevent discriminatory or harassing conduct. Employees are encouraged to report any discrimination or harassment observed in their work environment.

We are committed to providing the requisite support for affected employees.

We observe laws and regulations governing the equality of men and women. Without limitation, equality encompasses areas such as the assignment of duties, compensation, training, professional development, and promotion.

We decide to employ applicants and promote members of staff exclusively on the basis of their performance, abilities and potential with regards to the task in hand. This principle of equality also applies to initial and in-service training, remuneration and the assignment of duties.

We also expect our business partners and in particular our suppliers to recognize and comply with human rights and the principles of the International Labour Organization (ILO) – the right to freedom of association and collective bargaining, the abolition of child and forced labor and the prohibition of discrimination in the workplace.

6. Gifts & Entertainment

Gifts are a normal expression of personal or professional ties in day-to-day business. They can, however, be misunderstood or interpreted as an attempt to exert undue influence. Consequently, no gifts, offers of entertainment or other benefits may be accepted which might cast doubt on an individual's personal integrity or the integrity and independence of Vynova.

Gifts, invitations or services may be accepted or offered providing they are in line with the law, Vynova's internal pre-authorization procedures and conventional business practice, are ethically unassailable and are made completely transparent. Such benefits must in no way influence the decision-making or behavior of the involved parties. Particular restraint is required with public officials as well as state-owned enterprises when it comes to offering gifts and invitations.

A detailed description of the rules for accepting and offering gifts can be found in the Vynova Gifts & Entertainment Policy.



7. Corruption

We are successful on the market in fair competition thanks to our abilities, products and services. Attempts to achieve competitive or other advantages by dishonestly influencing third parties are inadmissible. Business decisions must in principle be made in the best interests of the company which the member of staff is representing. Personal relationships or benefits from business associates must play no part.

The direct or indirect offering, payment, soliciting or acceptance of bribes in any form is prohibited. No benefit (cash or otherwise) that could be interpreted as a bribe shall ever be offered to, promised to or accepted from an individual or organization with the express or implied condition of gaining a commercial advantage. Facilitation payments to influence an individual are also bribes and should not be paid.

A detailed description can be found in the Vynova Anti-Bribery and Anti-Corruption Policy.

8. Donations and Sponsorships

Supporting politicians and political parties is strictly prohibited. Sponsorship funds, cash payments, business related membership of associations, or other organizations may be undertaken only in compliance with the applicable laws and with the prior consent of the President of Vynova Group. It is necessary that this is noted in the books of accounts.



9. Conflicts of Interest

A conflict of interest arises when an employee's personal interests might be inconsistent with those of the employer. We therefore expect our staff to maintain a strict separation between their business and private interests and not to allow any conflicts of loyalty to arise. Private interests must never influence business decisions and even giving any impression of such influence should be avoided.

Vynova employees shall at all times act in the best interests of the company. Wherever possible, situations in which personal interests conflict with those of Vynova should be avoided. The interests of related parties (family members and other residents of the same household) may, according to the circumstances, also be regarded as personal interests of an employee.

Existing or foreseeable conflicts of interest must be disclosed to your manager so that the subsequent course of action can be jointly discussed.

A detailed description can be found in the Vynova Conflict of Interest Policy.

10. Fair Competition

We are convinced that free and fair competition is the basis for prosperity and positive social development. Our employees accordingly strictly comply with applicable competition legislation and refrain from engaging in actions that could lead to unfair trade.

Informal meetings, arrangements or de facto collaboration with competitors which attempts to lead to a restriction of free competition are inadmissible. The appearance of such a business behavior shall also be avoided.

Equally, we will not unduly restrict our suppliers or customers in their business dealings. Employees must ensure that they do not use commercial strategies that may abuse a dominant market position.

Contracts which might have an impact on competition must be discussed with the Group Compliance Manager.

A detailed description can be found in the Vynova Competition Compliance Policy.

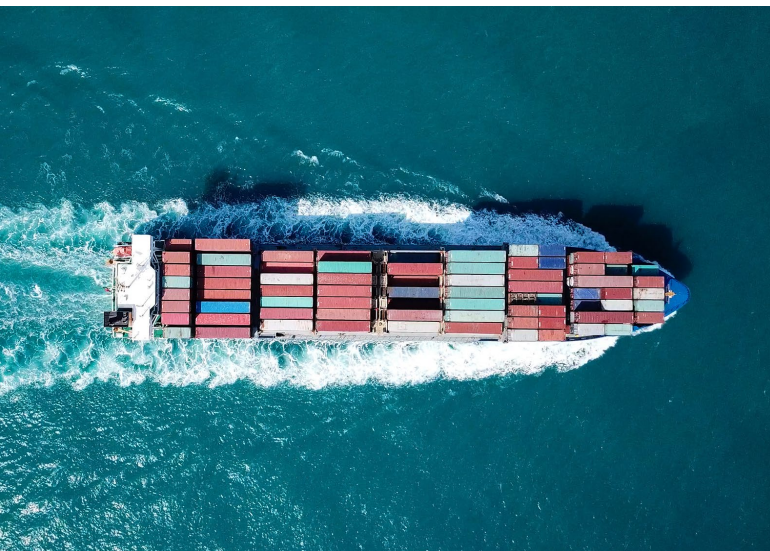


11. Foreign Trade and Trade Controls

As a corporate group with global activities, we are committed to comply with the laws of all jurisdictions in which we do business, including laws and regulations regarding sanctions, embargos and trade restrictions ("Sanction Regulations"). For products which are subject to special import or export restrictions, we ensure that all necessary registrations, licenses and authorizations are in place.

When purchasing, manufacturing or circulating goods or purchasing or transferring technology, we comply with trade control requirements. This applies in particular to the provisions on handling dual-use products, combating terrorism and chemical weapons.

Sanction regulations provide countries with legal control over the sale, shipment or transfer of goods and services across national borders including capital movements and payments. Export controls and sanctions may be imposed on countries, sites, legal entities and natural persons or goods and services.



We strictly comply with existing embargoes and sanctions. We do not do business, whether directly or indirectly, in countries, with companies or with individuals on whom a legally binding embargo has been imposed. This also applies to companies and individuals who might act as intermediaries in this respect.

If you are uncertain about the current legal situation or such links of potential business associates or suspect that the above obligations are being violated, please consult your Group Compliance Manager.

A detailed description can be found in the Vynova International Sanctions & Terror Lists Policy.

12. Money Laundering

Vynova supports the battle against money laundering and the funding of terrorism. Our members of staff never carry out or tolerate actions in their working environment which violate national or international legislation or other rules for combating money laundering and the funding of terrorism. We comply with current regulations for recording financial transactions.

In order to generally minimize the risk of becoming involved in money laundering, the entities of the Vynova Group only enter into business relationships with trustworthy companies, organizations and individuals. If necessary, appropriate investigations must be carried out. We reserve the right to check the background of a business partner in case of new business relationships.

We transfer money only for supplied and duly registered goods and services to natural and legal persons whose identity we know.

Movements of cash, in particular in relatively large amounts, are not usual in business dealings and must therefore in principle be scrutinized with a critical eye. Where appropriate, our members of staff must inform themselves about the applicable threshold values in countries in which Vynova does business.

A detailed description can be found in the Vynova Anti-Money Laundering Policy.

13. Transparency

Transparency is the basis for mutual trust. Current data and a willingness to enter into an open dialogue are indispensable for effective internal collaboration and dependable relationships with external partners.

We therefore ensure that we document relevant information methodically, make it available to other legitimately interested parties and use it as the basis for shared learning processes.

Accounting, Documentation, Reporting

We fulfill all statutory and other duties relating to accounting and documenting business processes. This includes establishing effective processes and internal controls for financial reporting and for publishing information in line with disclosure requirements. Our reporting procedures completely, clearly and traceably record and accurately present relevant processes and facts. We address actual, potential or foreseeable deviations or risks at an early stage so that the most effective strategic solutions can be developed.

Positive Error Culture

We are proud of our performance and celebrate our successes. We view errors and failures as opportunities to improve. The consequences and results of our business activities are therefore neutrally and honestly evaluated, analyzed and presented, ideally with reference to target parameters (KPIs). When discussing negative developments, we focus on identifying sources of error and opportunities for future improvement.

Communication with Stakeholders

Vynova maintains an open dialogue with relevant stakeholders such as the communities neighboring our production plants, media, supervisory authorities, policy makers or NGOs. This is because transparency is here too the basis for mutual trust. We accordingly always attempt to keep exchanges and debates objective, truthful and solution-focused.

Sales, Marketing and Advertising

We comply with statutory requirements and relevant codes of practice and voluntary undertakings in sales, marketing and advertising. We present our services and products truthfully and factually. The same applies to competitors' services and products where comparisons are legally admissible.

14. Corporate Assets & Intellectual Property

We ensure that we fundamentally treat company property with care, use it as intended and take reasonable steps to protect it from loss, theft, damage and access by third parties. Employees use company assets exclusively for business purposes except where private use is explicitly permitted. Assets include locations, equipment, financial facilities, trade secrets, patents and trademarks.

We ensure that our customers' and our own intellectual property does not pass into unauthorized hands or is not misused. Where possible, we obtain effective legal protection for our new developments and ideas by filing for patents, trademarks, brand names or other suitable forms of protection. We faithfully respect corresponding rights held by our customers.



15. Confidential Information

Employees and our consultants may acquire confidential information relating to our operations. Such information includes but is not limited to business strategy and development documents, balance sheet data, manufacturing and testing procedures, cost calculations, contracts of all kinds and information about customers, suppliers and other business associates. All personnel are obliged to maintain secrecy regarding confidential information both during and after their employment within Vynova.

Confidential information includes, without limitation, information on Vynova's business activities, technology, intellectual property, financial position, employees, as well as all information on Vynova's customers, suppliers, and business partners. Vynova's intellectual property includes not only trade secrets, patents, trademarks, and copyrights, but also business, marketing, and service plans, as well as technical knowledge.

Confidential information may not be disclosed to family members or other persons living in the same household, or to uninvolved colleagues, or used for purposes other than business.

Confidential information is exclusively used for business purposes for the benefit of Vynova and must not be passed on or repeated to anyone, inside or outside Vynova, unless they are authorized to receive such information. We ensure that such data is at all times securely protected from access by unauthorized colleagues or external third parties.

Confidential information and business documents must be appropriately protected against access by third parties and uninvolved colleagues. This includes marking internal e-mail communications as "confidential" or "strictly confidential" when necessary.

16. Data Protection

We treat data records transferred to or created by us with the greatest care to prevent unauthorized access, basing our procedures on the General Data Protection Regulation (GDPR) or comparable legal standards.

17. Electronic Means of Communication

Modern business processes are unimaginable without electronic means of communication. Within the Vynova Group, we make smart, responsible use of these means of communication, being aware of both the opportunities and the risks they involve.

“Electronic means of communication” are taken to mean company-owned devices such as smartphones, laptops or tablets together with the IT infrastructure and specific applications for internal or external collaboration such as collaboration platforms, email, chats or social media. In principle, the only electronic means of communication we use for business purposes are those which meet the technical standards of Vynova. New technology services, systems and platforms as well as software and means of communication operated by third parties must be checked and approved by the appropriate in-house service before being used.

Vynova has acquired software packages for all workplaces under the applicable licensing conditions. Employees are prohibited from copying software protected by such license agreements for private purposes and from installing private software at their workplace.

In general, reasonable personal use of electronic means of communication is admissible subject to applicable rules and instructions, providing no other restrictions apply. Electronic means of communication must be used with due care, in particular in order to prevent third party access to data. Under no circumstances may employees abuse Vynova’s information and communication media for illegal or unethical purposes. Notify your local IT department if a device is lost or stolen or if unauthorized data access is suspected.

More details can be found in the Vynova IT Guidelines.

18. Social Media and Media Relations

The creation and operation of external social media channels for Vynova is in principle the preserve of the relevant specialist department. Members of staff with social media responsibilities must be appropriately trained and their duties include continuously monitoring the channel in question.

Employees are free to use private social media channels. Please nevertheless be aware that the manner in which you present yourself may have an impact on the public perception of your employer and act accordingly. If in doubt, consult your company’s social media manager before publishing a post.

Strict regulation and a requirement for a minimum level of information often apply to communications relating to our products. Private posts about our products are therefore in general not permitted.

Honest, open and consistent communication with the public, especially the media, strengthens Vynova’s image worldwide. In general, the Group Communication Manager is authorized to communicate with the media. Employees who receive direct inquiries from the media should forward them to the Group Communication Manager.



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