

Code of Business Conduct for Suppliers

Policy Number:	Effective Date: January 1, 2022	Supersedes: February 12, 2021	Page: 1 of 3
Review Frequency:	Every 3 years		

ARTICLE I

GENERAL PRINCIPLES

- 1.01 **Scope.** This Code of Business Conduct for Suppliers (this “Code”) sets forth basic principles for Supplier conduct when working with ANGUS Chemical Company and its subsidiaries and other affiliates (“ANGUS”).
- 1.02 **Purpose.** ANGUS is committed to this Code’s principles and expects its Suppliers to also be committed to this Code’s principles.

ARTICLE II

HUMAN RIGHTS & LABOR

- 2.01 General Rule.** Respect for people is a core ANGUS value. We adhere to such values and expect our Suppliers to: (a) respect the human rights of their employees; and (b) treat their employees fairly and in accordance with all applicable laws, regulations and ordinances.
- 2.02 Respect Freedom of Association and Collective Bargaining.** Suppliers will respect employees’ lawful right of free association, as well as their lawful right to join, form or not to join or form a labor union or otherwise engage in collective bargaining.
- 2.03 No Forced and Compulsory Labor.** Suppliers will not use forced or involuntary labor, including, but not limited to, prison labor, indentured labor, bonded labor or slave labor.
- 2.04 No Harassment and Abuse of Labor.** Suppliers will ensure that their employees are not subjected to psychological, verbal, sexual or physical harassment or any other form of abuse, and will comply with all applicable laws, regulations and ordinances on harassment and abuse of employees.
- 2.05 No Child Labor** Suppliers will comply with all applicable child labor laws, regulations and ordinances.
- 2.06 Appropriate Work Hours and Wages.** Suppliers will comply with all applicable laws, regulations and ordinances on work hours, overtime, wages and benefits.
- 2.07 Conflict Minerals Sourcing.** Supplier will not source tin, tantalum, tungsten or gold (the “Conflict Minerals”) from the Democratic Republic of the Congo or the adjoining countries (the “Covered Countries”) in a manner which directly or indirectly finances or benefits armed groups in the Covered Countries. Supplier commits to: (a) abide by all applicable laws, regulations and ordinances related to Conflict Minerals; and (b) provide all necessary information requested by ANGUS

concerning products supplied by Supplier to enable ANGUS to complete its reasonable country of origin inquiries and due diligence with respect to Conflict Minerals.

ARTICLE III

ETHICS & LEGAL REQUIREMENTS

3.01 General Rule. ANGUS's Suppliers must comply with all applicable laws, regulations and ordinances where ANGUS conducts business. ANGUS's Suppliers must operate in an ethical manner.

3.02 Avoid Conflicts of Interest. Suppliers will avoid any interaction with an ANGUS employee that may conflict, or appear to conflict, with that employee acting in the best interests of ANGUS. This includes offering payments or employment opportunities to ANGUS employees.

3.03 No Bribery. Suppliers will not engage in any form of commercial bribery or otherwise offer any incentive to any ANGUS employee or ANGUS employee's family or friends in order to obtain or retain ANGUS business. Suppliers will comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act and all other local or otherwise applicable laws dealing with the bribery of government officials.

3.04 Fair Competition. Suppliers will comply with all applicable laws, regulations and ordinances regarding fair competition and antitrust.

3.05 Accurate Accounting and Business Records. Suppliers will retain accurate records of all matters related to the Supplier's business with ANGUS ("ANGUS Records"). Upon ANGUS's request, Supplier will provide accurate copies of ANGUS Records to ANGUS.

3.06 Protect Information. Suppliers will protect ANGUS's confidential information and act to prevent the misuse, theft, fraud or improper disclosure of such confidential information. Suppliers must take all due care in handling, discussing or transmitting such confidential information that could affect ANGUS, its employees, its customers, the business community or the general public.

3.07 Nondiscrimination: Suppliers will not conduct employment practices on the grounds of race, color, national origin, social or ethnic origin, sex, religion, age, gender, gender identity or expression, disability, HIV/AIDS status, trade union membership, marital status, pregnancy, political affiliation, sexual orientation or any other personal characteristic unrelated to job performance, and will comply with all applicable employment discrimination laws, regulations and ordinances.

3.08 Respect and Dignity: Suppliers will treat all employees with respect and will not use corporal punishment, threats of violence or other forms of physical coercion or harassment. Supplier must have a policy that prohibits inappropriate conduct and a reporting process for employees to report such conduct for Supplier's investigation and resolution.

ARTICLE IV

ENVIRONMENT, HEALTH & SAFETY

4.01 General Rule. ANGUS's commitment to sustainability includes: (a) an efficient use of resources; (b) the respect for the environment; and (c) a safe and healthy workplaces. ANGUS requires its Suppliers to make similar commitments to continuously improve their environmental, health and safety performance.

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4.02 Respect the Environment. Suppliers will operate in a manner that is protective of the environment. At a minimum, Suppliers must comply with all applicable environmental laws, regulation, ordinances and sound industry practice. Supplier must have: (a) systems in place to ensure the safe management of waste, air emission and wastewater discharges; and (b) procedures governing (i) chemical and waste management, (ii) the disposal and recycling of industrial wastewater treatment, and (iii) chemical discharge, air emissions control, environmental permits and environmental reporting. Suppliers must also comply with any additional environmental requirements as called for in ANGUS's product specifications and Supplier contracts. ANGUS will favor Suppliers who seek ways to minimize the use of nonrenewable resources, use all resources more efficiently and minimize the environmental impact of their operations.

4.03 Protect Health and Safety. Suppliers will provide a safe and healthy workplace for their employees, including appropriate controls, training, work procedures and personal protective equipment. Suppliers will comply with all applicable workplace health and safety laws.

ARTICLE V

COMPLIANCE

5.01 General Rule. In addition to the legal standards provided in this Code, Suppliers will comply with all other applicable laws, regulations and ordinances throughout the term of Supplier contracts to provide products or services to ANGUS. ANGUS expects Suppliers to implement procedures to promote compliance with all applicable laws, regulations and ordinances and the principles set forth in this Code, including, but not limited to, policies, training, monitoring and auditing mechanisms. Suppliers' contractors, subcontractors and suppliers are subject to this Code throughout the term of Supplier contracts to provide products and services to ANGUS.

5.02 Monitoring. ANGUS reserves the right to assess and monitor Suppliers' compliance with this Code. Suppliers who are not in compliance with this Code are expected to implement corrective actions or the noncompliant Supplier will not be considered for future business.

5.03 Reporting Misconduct. Suppliers who believe that an ANGUS employee or anyone acting on behalf of ANGUS has engaged in illegal or otherwise improper conduct with respect to their business with the Supplier should report the matter to ANGUS. Suppliers should also report any potential violation of this Code. Reports may be made to Human Resources at HR@angus.com. A Supplier's relationship with ANGUS will not be affected by a good faith report of potential misconduct.

Note: ANGUS Chemical Company and its affiliates reserve the right to make changes to this policy, in whole or part, from time-to-time, as necessary. Changes will be documented and updated appropriately.

Document History

The following information documents at least the last 3 changes to this document.

Date	Reviewed or Revised By:	Brief Description of Change
02.01.2021	John Sills	Added review frequency. No changes to content.
01.01.2022	Tom Mellnick	Updated 'Legal Counsel' to 'Human Resources' and updated formatting.

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John C. Sills – COO/CFO

01-13-2022

Date