

# Business Partner Code of Conduct

Effective April, 2019



## Nouryon Business Partner Code of Conduct

Nouryon is committed to doing business ethically and responsibly and expects the same of its business partners such as suppliers, distributors, agents and consultants. In support of this commitment, Nouryon has developed this Business Partner Code of Conduct to convey its expectations for its business partners with regards to compliance with laws, business practices and treatment of people. Nouryon's business partners should review the list of expectations below, as well as the Nouryon Code of Business Conduct and Ethics (attached), and take appropriate steps to ensure compliance. Nouryon may seek to verify its business partners' compliance with this Code, including through audits. Violations may be grounds for termination of the business relationship with the business partner.

1. Comply with laws. Business partners shall maintain awareness of and comply with all applicable laws and regulations of the countries where they operate, including – where applicable – anti-corruption laws, customs regulations, export and trade control laws, competition, antitrust and fair dealing laws, and privacy laws.
2. Do business ethically. Business partners shall not pay bribes, make facilitation payments, or provide kickbacks or give anything of value to improperly secure business or any business advantage.
3. Avoid inappropriate gifts, meals and entertainment. Business partners shall not provide or offer gifts, meals or entertainment (including cash or cash equivalents) to any Nouryon employee that could, or could appear to, inappropriately influence a business decision. Business courtesies of a nominal value (less than €50) may be accepted by Nouryon employees only in a manner consistent with Nouryon's Gifts & Business Entertainment Policy and all appropriate laws.
4. Demonstrate respect for people. Business partners shall seek to provide a work place free of discrimination and harassment, and treat employees and job applicants fairly.
5. Respect fundamental human rights. Business partners shall ensure that the products and materials they sell to Nouryon are not created with child labor, forced labor or through the victims of human trafficking and shall take reasonable steps to eliminate such practices in their supply chains.
6. Provide a safe working environment. Business partners shall provide a safe, clean and healthy working environment that complies with all relevant laws, rules, and regulations and shall strive to prevent occupational injuries and safety incidents.
7. Comply with environmental regulations. Business partners shall conduct their businesses in a manner compliant with applicable environmental laws, regulations and industry standards and shall support Nouryon's efforts to operate sustainably.
8. Keep accurate books and records. Business partners shall maintain accurate books and

business records as required by applicable legal and regulatory requirements and accepted accounting practices.

9. Cooperate on Conflict Minerals. Business partners shall ensure that any raw materials sold to Nouryon are free of conflict minerals sourced under circumstances that contribute to or support human rights violations. Business partners shall support Nouryon with respect to any of Nouryon's (or Nouryon's customers') conflicts minerals reporting requirements.
10. Manage and protect information. Business partners shall take appropriate steps to protect Nouryon's proprietary or confidential information, including employee information, customer data, intellectual property and trade secrets.
11. Preventing Fraud. Nouryon's Business partners shall have internal controls designed to detect, prevent and respond to fraud, money laundering and terrorism financing.

Where permitted by law, business partners may report suspected violations of this Business Partner Code of Conduct to Nouryon's SpeakUp! Reporting Website or Hotline or by contacting Nouryon's Chief Compliance Officer:

Toll-Free Telephone:

Toll-free telephone numbers for 40 countries are available on Nouryon's SpeakUp! website. Local language support is available. The SpeakUp! hotline is available 24 hours, seven days a week.

Translators are available to document your concerns in your local language.

SpeakUp! Website:

<http://www.nouryon.ethicspoint.com>

Nouryon  
Attn: Chief Compliance Officer  
P.O. Box 75730  
1070 AS Amsterdam  
The Netherlands  
E-mail: [nouryoncompliance@nouryon.com](mailto:nouryoncompliance@nouryon.com)