

# Business Partner Code of Conduct

Effective July 2021



## Nouryon Business Partner Code of Conduct

Ethical business conduct is a core element of Nouryon's strategy for growth and success and incorporated in our company values: **'We Aim High, We Own It, and We Do it Right'**. Similarly, we expect all our business partners to comply with all applicable laws and regulations and to embody, at all times, the guiding ethical principles outlined in this Business Partner Code of Conduct. Specifically, we expect our business partners to:

1. **Comply with Applicable Laws.** Business partners must 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, privacy laws and local labor and employment laws and international fair labor standards.
2. **Conduct Business Ethically:** Business partners cannot use cash, gifts or other forms or remuneration to obtain or retain business. Business partners are also prohibited from providing Nouryon employees with anything of value, including meals, gifts or entertainment in order to obtain or retain business or influence a business decision. Business courtesies of a nominal value (less than €50) may be accepted by Nouryon employees, but only if it complies with Nouryon's Meal, Gift & Business Entertainment Policy. Business partners must maintain accurate books and records of all meals, gifts, entertainment and related payments.
3. **Avoid Anti-competitive Behavior:** Business partners will, at all times, comply with applicable anti-competition/antitrust laws, including not sharing unnecessary commercially sensitive information of the business partner, or other third parties, with Nouryon.
4. **Respect Human Rights:** Business partners must cultivate a respectful and inclusive work environment free of discrimination and harassment. They must also ensure that they comply with all applicable local labor and employment laws and international fair labor standards and that their supply chains do not allow or facilitate child-labor, forced labor or human trafficking.
5. **Provide a Safe Working Environment:** Business partners must provide a safe, clean and healthy working environment that utilizes reasonable measures to prevent occupational injuries and safety incidents.
6. **Protect the Environment:** Business partners will comply with all applicable environmental laws and regulations and utilize best efforts to implement best practices and industry standards for environmental protection. Business partners will, to the extent possible, ensure that raw materials are sourced in a way that minimizes waste, deforestation, and other negative impacts on the environment and local communities.
7. **Adhere to Responsible Sourcing Standards:** Business partners will comply with and cooperate with Nouryon's need to comply with laws and regulations related to Conflict Minerals, Modern Slavery, and other responsible sourcing initiatives. Business partners will also follow best practices for research and development, such as avoiding animal testing where possible, and for the sourcing of at-risk raw materials such as [palm oil](#). We will measure the sustainability and ethical sourcing

performance of our suppliers through their [EcoVadis](#) score. Results will be tracked in the EcoVadis dashboard. Suppliers scoring 45 or lower and those not having an EcoVadis score may be required to provide improvement plans to demonstrate improvement of their sustainability and ethical sourcing practices

8. **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.
9. **Reporting Concerns:** Business partners will provide employees and third parties with an anonymous channel to report potential violations of law, regulation, policy or this Code. Business partners will prohibit any retaliation against employees, or third parties, who raise good faith concerns.

Any concerns about a business partner or Nouryon's compliance with this Code should be directed to our SpeakUp! reporting system. We offer toll-free telephone numbers in 36 countries and multiple languages. Please visit the [SpeakUp! website](#) for more information.

You can also send an email to Nouryon's Compliance team directly by emailing [nouryoncompliance@nouryon.com](mailto:nouryoncompliance@nouryon.com) or:

Nouryon  
Attn: Chief Compliance Officer  
100 Matsonford Road  
Building 5, Suite 550  
Radnor, PA 19087  
United States of America

Your partner  
in essential solutions  
for a sustainable future

**Nouryon**