

# Supplier Code of Conduct

ChemDesign is striving to be ethical and transparent in all of our business transactions and treat our customers, colleagues and suppliers with fairness and respect. We want to enrich lives, build and grow together, be reputable, and live safely.

ChemDesign's Supplier Code of Conduct details the expectations we have of our suppliers. Suppliers is defined as all vendors that provide materials and/or services. It is not intended to be a list of rules but a practical resource that provides a clear understanding of how our suppliers should operate as our partner.

As a supplier to ChemDesign Products, Inc. please read and ensure your organization understands our Supplier Code of Conduct. If you have any questions about the Supplier Code of Conduct or about how it might impact your partnership with ChemDesign, please contact us for clarification.

## **Safe and Healthy Work Environment**

Employee health and wellness is our first priority. We expect our suppliers to comply with all applicable workplace health and safety laws and have required permits, licenses, and permissions granted by local and national authorities.

Suppliers are expected to provide a safe and healthy workplace for their employees which includes proactively preventing occupational injuries, illnesses and incidents. Suppliers should have health and safety policies and/or procedures and appropriate training, controls, and protective equipment. It is expected that you be continuously improving your safety program.

Where appropriate and reasonable, suppliers will comply with quality and/or safety audits and address any follow-up actions as requested by ChemDesign.

## **Environmental**

We expect our suppliers to be environmentally responsible, to comply with all applicable (local, state and federal) environmental laws, and to have systems in place to ensure safe management of waste, air emissions and wastewater discharges. Our suppliers are expected to report any spills, leaks or accidental discharges to the appropriate governmental authorities. We will choose to work with partners who seek to implement sustainable production processes and who proactively minimize adverse environmental impacts from their operations.

## Communities

Lives are enriched by supporting the communities in which we work and live. Company connections are stronger than business relationships. ChemDesign values partnerships that reflect the diversity of our customers, our suppliers, and their families. Suppliers that engage in charitable and sustainable activities in their communities and initiate outreach efforts to understand and assist with local and regional needs are valued.

## Workplace Harassment

We expect our suppliers to treat their employees with dignity and respect. Suppliers should ensure their employees are not subject to psychological, verbal, sexual, or physical harassment, including bullying, violence, threats or intimidation, or any other form of abuse in the workplace. We expect our suppliers will comply with all applicable laws regarding the harassment and abuse of employees.

## Diversity and Inclusion (Non-discrimination)

Diversity is simply a representation of many different types of people (gender, race, ability, religion, etc.)

Inclusion is deliberation act of welcoming diversity and creating an environment where all different kinds of people can thrive and succeed.

It is expected that our suppliers will never discriminate or tolerate employees discriminating against any employee or applicant because of age, race, religion, color, gender, disability, national or ethnic origin, ancestry, marital status, family status, sexual orientation, gender identity or expression, or veteran status, and will comply with all applicable employment discrimination laws.

## Child Labor

It is expected that our suppliers do not tolerate any form of exploitative child labor as defined in the International Labor Organization Convention 182, Article 3 (Worst Forms of Child Labor). Accordingly, to observe applicable laws regarding the employment of minors and do not employ any young person in such a way as to restrict their educational opportunities or expose them to workplace hazards that are likely to endanger their health or safety.

## Forced Labor

It is expected that our suppliers do not and will not use indentured, slave, bonded, or other forced involuntary labor and rejects corporal punishment of any kind.

## Procurement Practices

We expect our suppliers to engage in ethical procurement practices that are properly documented, clearly defined in nature and purpose, and are in accordance with standard, written trade terms. Suppliers should take into account environmental and safety awareness during the selection and evaluation of their suppliers.

## Conflict Minerals

Conflict minerals are natural resources—such as tin, tantalum, tungsten, and gold—that are extracted under conditions where their trade directly contributes to armed conflict, human rights abuses, and environmental degradation. At ChemDesign, we are committed to ethical sourcing and responsible supply chain management. As a participant in the chemical industry, we recognize the importance of ensuring that our raw materials, intermediate, and finished chemical products do not contribute to human rights abuses or conflict financing.

If ChemDesign does require a supplier to provide such materials we expect our suppliers to:

- Conduct due diligence on the source and chain of custody of conflict minerals in their products.
- Provide accurate and timely reporting using the Responsible Minerals Initiative (RMI) Conflict Minerals Reporting Template (CMRT).
- Source responsibly, preferably from smelters and refiners validated as conflict-free by recognized industry programs.
- Support transparency and cooperate with audits or assessments related to conflict minerals sourcing.

## Confidential Information

Suppliers are expected to use confidential information and data carefully and appropriately and to protect it as well as to use it only for the purpose of the execution of the applicable order. Data and information may only be disclosed to the extent necessary. Suppliers should comply with all applicable data protection laws and regulations, as amended from time to time. Suppliers should provide all employees who come into contact with such data or information with the appropriate training pursuant to the relevant data protection laws and regulations and require them to keep the data and information confidential.

## Ethical and Responsible Competition

We obtain competitive information ethically and legally and expect our suppliers to do the same.

We expect our suppliers to conduct business with honesty and integrity and in compliance with all relevant anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt Practices Act and other countries' laws intended to deter corruption and bribery in commercial relations and among government officials and political candidates.

## Conflict of Interest

We require our suppliers to disclose any conflicts of interest or potential conflicts of interest and to cooperate with ChemDesign to avoid, manage or resolve any actual or perceived conflicts of interest. We expect our suppliers will avoid any interaction with a ChemDesign employee that may conflict, or appear to conflict, with that employee acting in the best interests of the company.

## Gift & Entertainment Policy

Although in some settings it may be appropriate to give or receive gifts to strengthen business relationships, we do not encourage giving or receiving gifts. Suppliers should be aware that if gifts and/or entertainment are offered or provided, they need to be consistent with customary regional business practices, have a clear business purpose, and cannot be perceived as a bribe or improper payment.

## Anti-Money Laundering Policy

To ensure that ChemDesign's financial processes and procedures abide to the anti-money laundering laws, money earned by using the following means is considered money laundering, and it is prohibited: Money or assets received in exchange for criminal or unlawful acts, money whose origin is not explicit or earned by assisting any activity in evading lawful means, property gained after any criminal activity and its origin, location, and disposition are not transparent, property which is promoting any unlawful activity and terrorism financing.

## Reporting Noncompliance and Personnel Protection

An ethical workplace is built on ethical workers, who are willing to raise questionable behavior and hold each other accountable.

A supplier, who believes a ChemDesign employee or anyone acting on behalf of ChemDesign has engaged in illegal or otherwise improper conduct with respect to their business with the supplier, should report the matter. Suppliers also should report any potential violation of this Code. A supplier's relationship with ChemDesign will not be affected by an honest report of potential misconduct.

ChemDesign encourages all personnel, and stakeholders acting in good faith, to report suspected or actual wrongful conduct. ChemDesign is committed to protecting individuals from interference with making a protected disclosure, from intimidation or retaliation for having made a protected disclosure, and for otherwise fulfilling any of their compliance obligations.