

# J.M. Huber Corporation Code of Conduct

*J.M. Huber Corporation's ("Huber") reputation and profitability depend on the integrity of our employees' individual actions and decisions. The trust our customers, shareholders and communities place in Huber is an invaluable asset. Each Huber employee and partner has a personal responsibility to maintain and strengthen that trust and protect Huber's reputation.*

*This Code of Conduct clarifies and emphasizes the requirements and expectations we have of Huber's employees in their day-to-day work. The Code of Conduct applies to all employees of Huber and its affiliated companies. Huber chooses to work with ethical business partners and encourages them to act in line with this code.*

## ETHICS

**Anti-Corruption** Huber does not tolerate any form of corruption, extortion or embezzlement. Huber employees must never—directly or through intermediaries—offer or promise any personal or improper advantage to obtain or retain a business or other advantage from a third party, whether public or private. Huber employees will not pay or accept bribes, arrange or accept kickbacks and shall not take any actions to violate, or cause its business partners to violate, any applicable anti-bribery laws and regulations, including the US Foreign Corrupt Practices Act and the UK Bribery Act.

**Competition** Employees may find it necessary to meet with their counterparts at competing companies. During these meetings, they must manage contact with competitors with care and such contact must always be organized in a way that ensures compliance with competition regulations.

**Conflicts of Interest** When an employee is in a situation in which competing loyalties could cause them to pursue a personal benefit for themselves, their friends or family at the expense of Huber, they may be faced with a conflict of interest. Huber's employees must identify, declare or avoid situations in which their own interests or those of relatives or friends may risk conflicting with what is best for Huber.

**Gifts & Business Courtesies** Huber is committed to competing solely on the merit of our products and services. Employees should avoid any actions that create a perception that favorable treatment of outside entities by Huber was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom Huber does or may do business. Huber will neither give nor accept business courtesies that constitute—or could reasonably be perceived as constituting—unfair business inducements that would violate law, regulation or policies of Huber or

customers, or would cause embarrassment or reflect negatively on Huber's reputation.

**Intellectual Assets** Huber's intellectual property rights (our trademarks, logos, copyrights, trade secrets, "know-how" and patents) are among our most valuable assets. Unauthorized use can lead to a serious or complete loss of value. Employees must respect all copyright and other intellectual property laws, laws governing the fair use of copyrights, trademarks and other intellectual property. Huber strongly encourages employees to report any suspected misuse of trademarks, logos or other intellectual property to Huber's Legal department.

Likewise, employees should respect the intellectual property rights of others. Inappropriate use of others' intellectual property may expose Huber and the employee to criminal and civil fines and penalties. Employees are instructed to seek advice from Huber's Legal department before soliciting, accepting or using proprietary information from individuals outside the Company, or letting them use or have access to Huber proprietary information.

**Huber's Property** Huber's property must only be used for Huber's business. It may not be used for competing purposes or in any other inappropriate manner that risks damaging Huber. Huber's property may not be used for the personal gain of an employee, or that of their relatives or friends. Equipment that Huber provides to employees remains Huber's property, and must be looked after accordingly.

**Confidentiality** Huber's communication must be open, correct, transparent and easily accessible, as well as comply with legal requirements and commercial confidentiality. Information on Huber's operations, customers or suppliers may be confidential or protected. Huber employees must protect such information from unauthorized use and dissemination in compliance with Company confidentiality policies.

# HUMAN RIGHTS AND LABOR

**Human Rights** Huber supports and respects protection of internationally recognized human rights. Huber will ensure that all employees are treated humanely, with dignity, and will never suffer physical or mental punishment or any other form of abuse.

**Child Labor** Huber does not use, support or benefit from child labor. Huber adheres to minimum age provisions of applicable laws and regulations.

**Forced Labor** Huber does not use, support or benefit from any form of forced labor. Huber prohibits physical abuse of employees and prohibits the use of all forms of forced labor including prison labor, indentured labor, bonded labor, military labor or slave labor.

**Human Trafficking** Huber denounces any act involved in the recruitment, abduction, transport, harboring, transfer, sale or receipt of persons within national or across international borders, through force, coercion, fraud or deception. Huber expects all employees to be vigilant and report any discovery of slavery or human trafficking to Huber's Legal department.

**Freedom of Association** Huber respects employees' right to join, form or not to join a labor union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, Huber strives to establish a constructive dialogue with their freely chosen representatives and bargain in good faith with such representatives.

**Health and Safety** Huber provides a healthy and safe working environment for all its employees. Risks are constantly evaluated such that protective measures can be taken to ensure a safe working environment. Huber maintains a productive workplace by minimizing the risk of accidents, injury and exposure to health risks. Huber provides potable drinking water, adequate lighting, temperature, ventilation, sanitation and personal protective equipment together with well-equipped work stations. In addition, facilities are constructed and maintained in accordance with the standards set by applicable laws and regulations.

**Political Activity** Huber recognizes the personal right of its employees to participate in political activity. Huber employees may publicly support or oppose any political party, candidate or cause that they choose in a personal capacity, provided such employee does not represent their support or opposition as that of Huber or use any Huber materials or property in the process.

**Diversity and Equal Opportunities** Huber treats all employees with dignity, respect and integrity. There must be no incidence of discrimination, harassment, abuse or threats in the workplace. Huber's employees must have fair and equal development opportunities irrespective of their gender, ethnicity, religion, age, disability, sexual orientation, nationality, political opinion, union membership, social background, veteran status, health status or family responsibilities. The basis for recruitment, hiring, placement, training, compensation and advancement should be qualifications, performance, skills and experience.

**Working Hours and Wages** Huber's employees are provided with competitive wages and benefits that comply with local and national laws, as well as binding collective agreements, including those pertaining to overtime work and other premium pay arrangements. Huber offers employees opportunities to develop their skills and capabilities and provides advancement opportunities where possible. Huber complies with all applicable laws and mandatory industry standards including but not limited to regular working hours and overtime hours, with breaks, rest periods, holidays, illness, as well as maternity and paternity leaves. To the extent any employee has an employment contract, Huber complies fully with the terms of said agreements.

**Employee Privacy** Huber respects employees' privacy and handles personal data in confidence and in line with applicable laws and regulations.

**Employment Practices** Huber shall only employ workers who are legally authorized to work in their facilities. Huber is responsible for validating employees' eligibility to work through appropriate documentation.

**Emergency Planning** Huber has in place adequate safety protocols at each of its locations including emergency exits, first aid supplies, fire suppressants and detection equipment, and provides adequate training for its employees.

**Substance Abuse** Huber protects the health, well-being and safety of its employees, contractors, visitors and the public. As such, Huber administers substance abuse tests in accordance with its drug and alcohol policy and in compliance with the laws of the jurisdictions it operates. Furthermore, Huber provides all current employees with a confidential voluntary disclosure program to provide an opportunity for counseling and rehabilitation where appropriate and within the guidelines of the policy.

# ENVIRONMENT

**Beyond Compliance** Huber operates its facilities in full compliance with all local, state and federal laws and regulations. Huber shall obtain, keep current and follow the reporting guidelines of all the required environmental permits and registrations to be legally compliant at any time. Huber's commitment to environmental stewardship and reducing our impact on the planet goes beyond compliance.

**Resource Optimization** Huber seeks to mine or otherwise acquire and use materials for production in a responsible manner that does not negatively impact the well-being of humans, animals, ecosystems, biodiversity and other living systems. Huber meters, monitors and reports water and energy usage. Huber's Sustainability Strategy establishes facility and organizational efficiency targets that are reported publicly on an annual basis. Huber incorporates sustainable design—including elimination, reduction and recycling of finite natural resources—into our processes and product development.

**Renewable Energy** As part of Huber's Sustainability Strategy, the organization is committed to reducing our dependency on finite natural resources and reducing its impact on the environment by increasing its percentage of energy utilization from renewable resources. Huber will maintain a renewable energy utilization target and commits to reporting publicly on an annual basis.

**Waste Minimization** As a key element of Huber's Sustainability Strategy, the organization seeks to minimize waste from its operations through engineering, elimination,

reduction, reuse and recycling. Huber will maintain and report performance relative to its waste reduction objectives related to air and carbon emissions, water emissions, and material waste from our manufacturing operations.

**Sustainable Capital Investment** Huber's Sustainability Strategy centers on a Triple Bottom Line approach that balances People, Planet & Profit considerations when making business decisions. As such, capital investment is preferentially deployed to projects with Triple Bottom Line benefits. Objectives related to sustainable capital deployment are established and reported annually.

**Sustainable Supply Chain** Huber partners with socially and environmentally responsible suppliers. Huber requires that suppliers of goods and services take ethical, human rights, labor, energy and environmental aspects into account in their business activities.

**Management of Hazardous Materials** Huber seeks to identify and manage chemical and other materials posing a hazard if released to the environment and ensure safe handling, movement, storage, recycling or reuse, and disposal of such materials.

**Land Rights** Huber will never operate on land on which it does not have the legal right to operate. Huber respects the communities it operates in and the rights of individual land owners and indigenous people. Huber works with communities in harmony and without violating the land rights where we operate.

# GENERAL

*Huber's employees must comply with all applicable legislation. If the provisions of the Code of Conduct are found to be incompatible with legislation, then applicable laws and regulations take precedence.*

*The Code of Conduct is a broad but not exhaustive document. Huber's policies provide further guidance and specificity. Every employee is personally responsible for understanding and acting in accordance with the Code of Conduct and Huber's policies. The Code of Conduct is available on Huber's intranet and website. All supervisors are responsible for ensuring that their employees are familiar with the Code.*

*Huber expects that an employee or other stakeholder who suspects a breach of the Code of Conduct will report to Huber's Legal department. An employee who wishes to report such a concern can contact their superior manager or another manager at Huber. There is also the option for employees to use Huber's Ethics Line program. Huber will not tolerate any form of reprisals against any reports made in good faith.*

