

Anti-Fraud and Corruption Policy

Summary

This policy outlines the company's commitment to maintaining the highest standards of integrity and ethical conduct. It emphasizes fostering a culture of integrity and transparency, with clear accountability and effective oversight through a Fraud Accountability Matrix. The policy also includes key policies and procedures, a robust fraud risk management framework, and comprehensive training programs to enhance employee awareness and competence in fraud prevention.

Scope: This global policy applies to all employees, contractors, suppliers, and third parties working on behalf of Elementis.

Core Commitments:

- Top Level Commitment
- Regular Fraud Risk Assessment
- Enhanced procedures for Due Diligence
- Fraud Reporting Mechanisms
- Training and Awareness
- Ongoing Monitoring and Reporting
- Promotion of an Ethical Culture in Business

Applicable to:	All Elementis (Global Policy)
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1. Purpose and Commitment

Elementis is committed to maintaining the highest standards of integrity and ethical conduct. This Anti-Fraud and Corruption Policy outlines our commitment to preventing, detecting, and responding to fraud and corruption within our organization. It serves as an umbrella policy that integrates and refers to all relevant policies aimed at combating fraud, including the Expenses Policy, Gifts and Entertainment Policy, and others. Our aim is to ensure full compliance with the Economic Crime and Corporate Transparency Act 2023 (ECCTA) guidelines.

At Elementis, we believe in fostering a culture of integrity and transparency. Our commitment to anti-fraud and corruption is unwavering, and we expect all employees, contractors, and business partners to adhere to the highest ethical standards. We are dedicated to creating an environment where fraud and corruption are not tolerated, and where everyone understands their role in preventing and addressing these issues.

We are here to support and propel our business forward, and we encourage your continued engagement and suggestions. Your ongoing feedback is essential as we progress.

2. Our Values

At Elementis, our values guide our business, determine our success, and shape our culture. They are at the core of every decision we make. Our values are:

- Safety: Our Way of Life - We are committed to providing a safe environment for all.
- Solutions: Creating Value for Our Customers - We make a difference through our expertise, responsiveness, and focus on quality.
- Ambition: Passion for Excellence - We are innovative, courageous, and driven in everything we do.
- Respect: We Do the Right Thing - We care for our colleagues, customers, communities, and environment.
- Team: The Power of Collaboration - We work, grow, and succeed together.

3. Who does this Policy apply to?

This policy applies to all Elementis employees, contractors, suppliers, and third parties working on behalf of the company. It underpins our Code of Conduct and Ethics, ensuring that all parties understand their roles and responsibilities in preventing, detecting, and responding to fraud and corruption within the organization.

4. Accountability Matrix

To ensure clear accountability and effective oversight, we have established a Fraud Accountability Matrix. This matrix assigns specific fraud risk responsibilities to named individuals at both the

Board and senior management levels. The matrix outlines the roles and responsibilities for fraud prevention, detection, and response, ensuring that all relevant parties are aware of their duties and obligations.

Task/Activity	Responsible	Accountable
Top-Level Commitment	Board of Directors and ELT	CEO
Fraud Risk Assessment	Head of Risks and Controls	ELT
Due Diligence Enhancements	General Counsel; Legal & Compliance Team	ELT
Fraud Reporting Mechanism	Legal & Compliance Team	General Counsel
Training and Awareness	Legal & Compliance Team	Global Head of Compliance
Monitoring and Reporting	Legal & Compliance Team	General Counsel and ELT
Formalized Fraud Prevention Framework	Legal & Compliance Team	ELT
Strengthen Contract Management	Head of Legal EMEA APAC; Associate General Counsel	General Counsel
Enhanced Monitoring for Associated Persons	Legal & Compliance Team	General Counsel
Continuous Due Diligence	Legal & Compliance Team	General Counsel
Foster an Ethical Culture	Board of Directors; ELT	General Counsel; Global Head of Compliance

Task/Activity	Responsible	Accountable
Regular Reporting and Board-Level Involvement	Head of Risks and Controls; Global Head of Compliance	General Counsel

5. Key Policies and Procedures

This policy refers to several key policies and procedures that collectively form our anti-fraud and corruption framework. These include, but are not limited to:

I. [Global Travel and Expenses Policy](#):

Outlines the procedures for claiming and reimbursing expenses, ensuring that all claims are legitimate and properly documented.

II. [Gifts and Entertainment Policy](#)

Sets out the guidelines for accepting and offering gifts and entertainment, preventing any form of bribery or undue influence.

III. [Customer and Supplier Risk Screening Policy](#)

Ensures that all third-party relationships are subject to rigorous due diligence to prevent fraud and corruption.

IV. [Whistleblowing & Speak Up Policy](#)

Encourages employees to report any concerns or suspicions of fraud or corruption, providing a safe and confidential mechanism for whistleblowing.

V. [Anti-Money Laundering & Anti-Terrorist Financing Policy](#)

Reinforces that the company doesn't participate in money laundering schemes, or terrorist financing, nor do we do business with third parties who do. Any form of money laundering or other financial wrongdoing violates the law as well as our Values.

VI. [Conflicts of Interest Policy and Annual Declaration](#)

Actual, potential or perceived conflicts of interest can hurt our people, reputation and standing in the marketplace. We are committed to avoiding these conflicts wherever possible and an annual declaration has been implemented throughout the company.

VII. [Code of Conduct](#)

Defines the ethical standards and behaviors expected of all employees, reinforcing our commitment to integrity and transparency.

6. Fraud Risk Management

Elementis is committed to continuously improving our fraud risk management framework. This includes regular risk assessments, the implementation of proportionate procedures, and ongoing monitoring and review. We integrate advanced tools and procedures to proactively detect and mitigate fraud risks, ensuring that our controls remain effective and up-to-date.

7. Training and Awareness

We recognize the importance of training and awareness in preventing fraud and corruption. All employees receive regular training on our anti-fraud and corruption policies, including the principles of top-level commitment and continuous education. Our training programs are designed to enhance employee awareness and competence in fraud prevention, adapting content to evolving risks and regulatory requirements.

Employees and Contractors: Understand and adhere to this policy and report any concerns or violations.

Suppliers and Business Partners: Comply with Elementis's Supplier Code of Conduct, which incorporates this policy, ensuring integrity and ethics are respected throughout the supply chain.

Leadership: Lead by example and ensure teams are trained on anti-corruption and anti fraud topics. Foster a culture of integrity and transparency aligned with Elementis values.

8. Reporting Concerns

Employees and third parties are encouraged to report suspected violations of this policy through the IntegrityCounts Speak Up Line, which guarantees confidentiality and non-retaliation.

Resources at Your Disposal

You can always speak to your manager, HR, Finance, or Legal & Compliance (compliance@elementis.com) if you have questions or concerns. For confidential and anonymous reporting, our IntegrityCounts Speak Up Line is available 24/7:

Phone (check your country's number below)

Online: integrity-counts.com/org/elementis

Email: elementis@integrity-counts.com

Country-Specific Speak Up Line Numbers:

Brazil	0-800-761-1959	India	000-8001007980	UK	0-800-092-3586
China	400-120-8514	Malaysia	+60 154-877 1090	US	1-866-921-6714
Finland	0 800 915 702	Netherlands	00-800-2002-0033	Portugal	+351-308-801-038
Germany	0-8001806718	Taiwan	00-800-2002-0033		

Zero Tolerance for Retaliation

Elementis stands by those who raise concerns in good faith. Retaliation is not tolerated, and we are committed to protecting you if you Speak Up. Together, we're creating a safe, fair, and transparent workplace.

9. Implementation and Oversight

Elementis integrates anti-corruption and fraud considerations into its risk management, supplier evaluations, and employee training programs. The compliance team, supported by leadership, ensures adherence and regular policy reviews.

10. Conclusion

At Elementis, integrity is our specialty.

Our commitment to ethical business practices is unwavering, and we strive to uphold the highest standards of conduct in everything we do.

This Anti-Fraud and Corruption Policy is a testament to our dedication to transparency, accountability, and compliance with the Economic Crime and Corporate Transparency Act 2023 (ECCTA) guidelines.

Our Code of Conduct and Ethics emphasizes our core values: Safety, Solutions, Ambition, Respect, and Team. These values guide our actions and decisions, ensuring that we operate with honesty and integrity.

By fostering a culture of integrity and transparency, we create an environment where fraud and corruption are not tolerated, and where everyone understands their role in preventing and addressing these issues.

Investing in Elementis means investing in a company that prioritizes ethical behavior, compliance, and sustainability. Our robust fraud risk management framework, clear accountability structures, and comprehensive training programs demonstrate our commitment to maintaining the highest standards of integrity. We are dedicated to continuous improvement, regularly reviewing and

enhancing our policies and procedures to stay ahead of emerging risks and regulatory requirements.

By aligning our practices with the ECCTA guidelines and proactively addressing fraud and corruption risks, Elementis not only ensures regulatory compliance but also strengthens its internal resilience. This strategic approach positions Elementis as a leader in fraud risk management within the chemical industry, making us a trusted partner for investors who value ethical business practices and long-term sustainability.

Together, we can make a positive impact on our industry and the world.