

Business Partner Code of Conduct

OUR COMMITMENT

Elementis and the companies in its group are committed to ensuring that “Integrity is our Specialty” in line with our Values of Safety, Solutions, Ambition, Respect and Team. We are committed to complying with the law, ensuring the protection of human rights, high standards of ethical behaviour and environmental practices throughout our business and our supply chain.

As part of this commitment, we require our suppliers, distributors and agents (“**Elementis Business Partners**”) to agree to and comply with this Business Partner Code of Conduct (“**Business Partner Code**”). Please sign at the end of the document.

We recognise that our suppliers work in different legal and cultural environments across the globe. This Business Partner Code sets out the basic requirements, based on international standards, that we expect of Elementis’ Business Partners (including distributors, agents, suppliers, vendors, service providers, independent contractors and consultants), as a condition of conducting business with Elementis. Elementis is committed to the United Nations Global Compact and the International Labour Organisation’s Declaration on Fundamental Principles and Rights and Work.

Elementis is also committed to the OECD Guidelines for Multinational Enterprises, particularly Annex 2, which outlines the risks and provides a common base of understanding for responsible sourcing. We expect our business partners to adhere to these guidelines to ensure ethical and sustainable practices throughout our supply chain.

The Business Partner Code consists of the following core principles:

1. Provide a safe and healthy workplace
2. Act lawfully and ethically
3. Promote a respectful, fair and diverse workplace
4. Protect the environment and community

We also expect Elementis Business Partners to have a similar Code or policy, which covers the equivalent principles to this Business Partner Code, for their own suppliers and business partners.

If anyone has concerns that this Business Partner Code is not being complied with they can let us

¹ Annex 2 of the OECD Guidelines for Multinational Enterprises outlines the risks and provides a common base of understanding for responsible sourcing. It includes categories such as human rights abuses, child labor, forced labor, environmental degradation, and corruption and bribery. The Annex also provides recommendations for due diligence, including identifying and assessing risks in the supply chain, implementing strategies to prevent and mitigate identified risks, tracking the effectiveness of these strategies, communicating how risks are being addressed, and providing for or cooperating in remediation when appropriate.

Unique chemistry,
sustainable solutions

Source: OECD Guidelines for Multinational Enterprises.

know via our *IntegrityCounts* hotline, the details of which are at the end of this Code.

By doing business in accordance with this Business Partner Code, we are all positively contributing to society and the environment, for everyone around us.

业务合作伙伴行为准则

Elementis 及其集团旗下公司致力于确保“诚信是我们的特质”符合我们安全、解决方案、进取心、尊重和团队的价值观。我们致力于遵守法律，确保在我们的业务和供应链中保护人权、高标准的道德行为和环境实践。

作为此承诺的一部分，我们要求我们的供应商、分销商和代理商（“Elementis 业务合作伙伴”）同意并遵守本业务合作伙伴行为准则（“业务合作伙伴准则”）。请您在本文档末尾签名或盖章。

我们认识到，我们的供应商在全球不同的法律和文化环境中运营。本业务合作伙伴准则规定了基于国际标准的基本要求，作为与 Elementis 开展业务合作的条件，是我们对 Elementis 业务合作伙伴（包括分销商、代理商、供应商、服务提供者、独立承包商和顾问）的期望。Elementis 致力于联合国全球契约和国际劳工组织的《基本原则、权利和工作宣言》。

Elementis 还承诺遵守《OECD 跨国企业指引》，特别是其附录2，该指引概述了相关风险，并为负责任采购提供了共同的理解基础。我们期望我们的商业合作伙伴遵守这些指引，以确保在整个供应链中符合道德规范和可持续经营。

业务合作伙伴准则由以下核心原则组成：

1. 提供安全健康的工作场所
2. 合法和合乎道德地行事
3. 促进尊重、公平和多元化的工作场所
4. 保护环境和社区

我们还希望 Elementis 业务合作伙伴为其自己的供应商和业务合作伙伴制定类似的准则或政策，涵盖同本业务合作伙伴准则相当的原则。

如果任何人发现本业务合作伙伴准则未被遵守，他们可以通过我们的 IntegrityCounts 热线告知我们，其详细资讯在本准则末尾。

通过按照本业务合作伙伴准则开展业务，我们都在为我们身边每个人的社会和环境做出积极贡献。

《OECD 跨国企业指南》的附录2概述了负责任采购的风险并提供了理解负责任采购的共同基础。负责任采购涵盖侵犯人权、使用童工、强迫劳动、环境破坏以及腐败和贿赂。该附录还提供了尽职调查的建议，包括识别和评估供应链中的风险、实施战略以防止和降低已识别的风险、跟踪这些战略的有效性、沟通风险的应对方式以及在适当的时候提供或合作采取补救措施。

来源：《OECD 跨国企业指南》

1. PROVIDE A SAFE AND HEALTHY WORKPLACE

1.1 HEALTH AND SAFETY STANDARDS

Elementis Business Partners must meet or exceed the requirements of applicable health and safety laws and regulations. Elementis Business Partners must maintain a safe, healthy and secure workplace. Any residential facilities must also be safe, healthy and secure. Work areas must be of a standard to prevent accidents, injuries and illnesses and to ensure an adequate level of sanitation. Elementis Business Partners must reduce the potential for injuries and illnesses in the workplace by eliminating or minimizing workplace hazards.

1.2 HEALTH AND SAFETY TRAINING

Elementis Business Partners must provide relevant health and safety training to workers.

1.3 HEALTH AND SAFETY REPORTING

Elementis Business Partners must have systems in place for their employees to report accidents, injuries and unsafe practices or conditions. Elementis Business Partners must maintain appropriate records of accidents and injuries.

1. 提供安全健康的工作场所

1.1. 健康与安全标准

Elementis 业务合作伙伴必须达到或超过适用的健康和安全法律法规的要求。Elementis 业务合作伙伴必须保持安全、健康和安全的场所。任何住宅设施也必须安全、健康和有保障。工作区域必须符合预防事故、伤害和疾病的标准，并确保适当的卫生水平。Elementis 业务合作伙伴必须通过消除或尽量减少工作场所的危害来减少员工受伤和疾病的可能性。

1.2. 健康与安全培训

Elementis 业务合作伙伴必须为工人提供相关的健康和安全培训。

1.3. 健康与安全报告

Elementis 业务合作伙伴必须为其员工建立系统，以报告事故，伤害和不安全的做法或条件。Elementis 业务合作伙伴必须保留适当的事故和伤害记录。

2. ACT LAWFULLY AND ETHICALLY

2.1 LEGAL COMPLIANCE

Elementis Business Partners must comply with applicable laws and regulations in the countries where they do business. If applicable laws conflict with the provisions in this Business Partner Code, Elementis Business Partners must comply with the law, while seeking to meet the principles within this Business Partner Code.

2.2 PROHIBITION OF BRIBERY AND CORRUPTION

Elementis Business Partners and their officers, directors and employees must have the highest standards of ethical business conduct. They must not engage in bribery or corruption in any form, either directly or through third parties. We expect Elementis Business Partners to promote anti-bribery and anti-corruption compliance in their organizations through developing their own standards, which to help their organisations and employees meet their legal obligations, including the UK Bribery Act and the US Foreign Corrupt Practices Act.

2.3 IMPROPER GIFTS, HOSPITALITY AND ENTERTAINMENT

Elementis Business Partners must not give gifts or entertainment to Elementis employees or representatives, that could be interpreted as a bribe, create a conflict of interest or the appearance of a conflict. Modest gifts and hospitality may be allowed, if in accordance with the Elementis Code of Conduct, Anti-bribery and Corruption Policy and Gifts & Entertainment Policy. Elementis Business Partners should not offer to Elementis employees or representatives:

- ☒ Anything that would break relevant laws
- ☒ Anything during an open tender or bidding process with Elementis
- ☒ Cash or cash equivalents including gift cards
- ☒ Travel or overnight accommodation for entertainment purposes
- ☒ Entertainment which the giver of the entertainment is not also attending
- ☒ Anything lavish or excessive
- ☒ Anything of a sexual, immoral or illegal nature
- ☒ Anything solicited by an Elementis employee or representative

2.4 CONFIDENTIALITY AND PRIVACY

Elementis Business Partners must respect and safeguard Elementis' confidential information (including personal information). Elementis Business Partners shall only use Elementis' confidential information for the purposes for which it was provided. Elementis Business Partners must promptly notify Elementis if they become aware of any intentional or unintentional improper disclosure or use of Elementis' confidential information. Elementis Business Partners must comply with applicable laws and regulations related to the protection and use of personal information.

2.5 FAIR COMPETITION

Elementis Business Partners must conduct their business fairly and ethically, and in compliance with all applicable fair competition and antitrust laws.

2.6 TRADE SANCTIONS

Elementis Business Partners must comply with all applicable trade sanctions and export control laws.

2.7 SOURCING AND MANUFACTURING PRODUCTS

Products and materials supplied by Elementis Business Partners must be appropriately and responsibly sourced and tested. These products and materials must also meet quality and safety industry norms for such items, as well as such other quality and safety standards as agreed between us. Elementis Business Partners must meet these standards and comply with all laws and regulatory requirements. These requirements apply both for goods or services supplied directly by the Business Partner to Elementis or indirectly via a third party, such as a sub-contractor.

2. 合法和合乎道德地行事

2.1. 法律合规

Elementis 业务合作伙伴必须遵守其开展业务所在国家/地区的适用法律和法规。如果适用法律与本业务合作伙伴准则中的规定相冲突，Elementis 业务合作伙伴必须遵守法律，同时力求满足本业务合作伙伴准则中的原则。

2.2. 禁止贿赂和腐败

Elementis 业务合作伙伴及其管理人员，董事和员工必须具有最高的道德商业行为标准。他们不得直接或通过第三方从事任何形式的贿赂或腐败。我们希望 Elementis 业务合作伙伴通过制定自己的标准来促进其组织的反贿赂和反腐败合规，以帮助其组织和员工履行其法律义务，包括英国反贿赂法和美国反海外腐败法。

2.3. 不当礼品、招待和娱乐

Elementis 业务合作伙伴不得向Elementis 员工或代表提供可能被解释为贿赂、制造利益冲突或冲突外观的礼物或娱乐。如果符合 Elementis 《行为准则》，《反贿赂和腐败政策》以及《礼品及招待政策》，则可以允许适度的礼品和招待。Elementis 业务合作伙伴不应向Elementis 员工或代表提供：

- ☒ 任何违反相关法律的行为
- ☒ 在 Elementis 的公开招标或投标过程中的提供任何礼品或招待
- ☒ 现金或现金等价物，包括礼品卡
- ☒ 以娱乐为目的的旅行或过夜住宿
- ☒ 娱乐的提供者自己不参加的娱乐活动
- ☒ 任何奢侈或过度的东西
- ☒ 任何性、不道德或非法的礼品或招待
- ☒ Elementis 员工或代表索取的任何礼品或招待

2.4. 保密和隐私

Elementis业务合作伙伴必须尊重和保护Elementis的机密信息（包括个人信息）。Elementis业务合作伙伴只能将Elementis的机密信息用于提供该信息的用途。如果Elementis业务合作伙伴发现任何有意或无意的不当披露或使用Elementis的机密信息，他们必须立即通知Elementis。Elementis业务合作伙伴必须遵守与个人信息保护和使用相关的适用法律和法规。

2.5. 公平竞争

Elementis 业务合作伙伴必须公平和合乎道德地开展业务，并遵守所有适用的公平竞争和反垄断法。

2.6. 贸易制裁

Elementis 业务合作伙伴必须遵守所有适用的贸易制裁和出口管制法律。

2.7. 采购和制造产品

Elementis 业务合作伙伴提供的产品和材料必须经过适当和负责任的采购和测试。这些产品和材料还必须符合此类项目的质量和安全行业规范，以及我们之间商定的其他质量和安全标准。Elementis 业务合作伙伴必须符合这些标准，并遵守所有法律和监管要求。这些要求既适用于业务合作伙伴直接向 Elementis 提供的商品或服务，也适用于通过第三方（如分包商）间接提供的商品或服务。

3. PROMOTE A RESPECTFUL, FAIR AND DIVERSE WORKPLACE

3.1 CHILD LABOUR AND YOUNG WORKERS

Elementis Business Partners must not employ child labour. The term “child” means any person employed under the age of 15 (or 14 where the law of the country permits) or under the minimum age for employment in the country, whichever is greater. Elementis Business Partners employing young workers (workers above the minimum age of employment but under the age of 18) must comply with applicable laws and regulations regarding hours, compensation and must avoid conditions or restrictions that could be hazardous or are harmful to their education, morals, physical or mental health, safety or development.

3.2 FORCED LABOUR AND HUMAN TRAFFICKING

Elementis Business Partners must not use or benefit from any form of modern slavery, human trafficking, or forced or compulsory labour of any kind. This includes prison labour, bonded, or indentured labour. Mandatory overtime is not permitted.

Workers must be allowed to leave their employment after giving reasonable notice. Imposing monetary fines, withholding identity papers (such as passports), work permits, remuneration or requiring recruitment deposits or other constraints as a condition of employment, is not allowed.

Elementis Business Partners must be able to check that their sub-contractors and suppliers also comply with these requirements.

3.3 RESPECT AND DIGNITY

Elementis Business Partners must treat their employees with respect and dignity. They must not engage in any kind of physical, verbal, psychological or sexual abuse, harassment or any other forms of intimidation or misconduct.

3.4 WORKING HOURS

Elementis Business Partners must comply with the local legal or contractually agreed-upon limit on hours worked. Where no limit is imposed, workers should not work for more than 60 hours a week at most, outside of extraordinary circumstances. Workers must receive at least one day off in seven days, or the local legal standard (whichever is greater). Workers must be allowed any legally required daily rest periods, and must not be required to take work home.

3.5 WAGES BENEFITS AND TERMS OF EMPLOYMENT

Elementis Business Partners must pay their employees a fair wage which covers the costs of living and in compliance with local laws, and any collective agreement or legitimate individual contractual agreement. Elementis Business Partners must give their employees any legally prescribed benefits. Workers must not be subject to financial penalties as a disciplinary measure or to illegal deductions for benefits payments. Workers should receive clear written information on their pay and conditions.

3.6 DIVERSITY, EQUALITY AND INCLUSION

Elementis Business Partners must strive to create a workplace where all employees feel safe, respected, valued and free to contribute ideas and perspectives. Elementis Business Partners must strive to create a workplace that is free from harassment and discrimination and inclusive of all people and their unique abilities, strengths and differences.

Elementis Business Partners must provide equal opportunities, in all aspects of employment and must not subject their workers to any illegal discrimination with regard to recruitment, hiring, remuneration, promotion, access to training, professional development, retirement or termination. Any employment decisions must be based on worker's ability and not on personal characteristics such as race, creed, colour, religion, gender, sex, age, national origin, alienage or citizenship status, sexual orientation, gender identity or expression, marital, partnership or familial status, disability, genetic information, veteran/military status, domestic violence victim status, social background, caste, health status, pregnancy, or any other characteristic protected by law. Workers with the same qualifications, skills, experience and performance should receive equal pay for equal work, as required by local law.

3.7 FREEDOM OF ASSOCIATION

Elementis Business Partners must recognise the right of employees to freely associate and must comply with all local laws governing the right of employees to select or not to select workplace representatives.

3.8 GRIEVANCE PROCEDURES

Elementis Business Partners must have effective grievance procedures that allow for concerns to be raised and dealt with fairly and objectively, without retaliation.

3. 促进尊重、公平和多元化的工作场所

3.1. 童工和年轻工人

Elementis 业务合作伙伴不得雇用童工。“儿童”一词是指未满 15 周岁（或国家法律允许的 14 周岁）或未满该国最低就业年龄（以较大者为准）的任何人。雇用年轻工人（超过最低就业年龄但未满 18 周岁的工人）的 Elementis 业务合作伙伴必须遵守有关工时，薪酬的适用法律和法规，并且必须避免可能对其教育、道德、身心健康、安全或发展有害的条件或限制。

3.2. 强迫劳动和人口贩运

Elementis 业务合作伙伴不得从事任何形式的现代奴隶，人口贩运或任何形式的强迫或强制劳动或从中受益，包括监狱劳工、债役劳工或契约劳工。不允许强制加班。

必须允许工人在给予合理通知后离职。不允许处以罚款、扣留身份证件（如护照）、工作许可证、报酬或要求招聘押金或其他限制作为就业条件。

Elementis 业务合作伙伴必须能够检查其分包商和供应商是否也遵守这些要求。

3.3. 尊重与尊严

Elementis 业务合作伙伴必须尊重和尊严地对待员工。他们不得进行任何形式的身体、口头、心理或性虐待、骚扰或任何其他形式的恐吓或不当行为。

3.4. 工作时间

Elementis 业务合作伙伴必须遵守当地法律或合同约定的工作时间限制。在没有限制的情况下，工人每周最多工作时间不得超过 60 小时，除非有特殊情况。工人必须在七天内至少休息一天，或按当地法律规定执行（以休息天数较大者为准）。必须允许工人享受任何法律要求的每日休息时间，并且不得要求将工作带回家。

3.5. 工资福利和雇佣条件

Elementis 业务合作伙伴必须向其员工支付公平的工资，其中包括生活费用，并遵守当地法律以及任何集体协议或合法的个人协议。Elementis 业务合作伙伴必须为其员工提供任何法律规定的福利。不得因执行违纪措施将让工人受到经济处罚或非法扣除工人的福利金。工人应收到有关其工资和条件的明确书面信息。

3.6. 多样性、平等和包容

Elementis 业务合作伙伴必须努力创建一个所有员工都感到安全，尊重，受重视并自由贡献想法和观点的工作场所。Elementis 业务合作伙伴必须努力创建一个没有骚扰和歧视的工作场所，并包容所有人及其独特的能力，优势和差异。

Elementis 业务合作伙伴必须在就业的各个方面提供平等的机会，并且不得使其工人在招聘，雇用，薪酬，晋升，获得培训，专业发展，退休或解雇方面受到任何非法歧视。任何雇佣决定都必须基于工人的能力，而不是基于个人特征，例如种族、信仰、肤色、宗教、性别、年龄、国籍、外国人或公民身份、性取向、性别认同或表达、婚姻、伴侣关系或家庭状况、残疾、遗传信息、退伍军人/军人身份、家庭暴力受害者状况、社会背景、种姓、健康状况、怀孕、或任何其他受法律保护的特征。根据当地法律要求，具有相同资格、技能、经验和绩效的工人应获得相同报酬。

3.7. 结社自由

Elementis 业务合作伙伴必须承认员工自由结社的权利，并且必须遵守所有约束员工选择不选择员工代表权利的当地法律。

3.8. 申诉程序

Elementis 业务合作伙伴必须有有效的申诉程序，允许员工公平客观地提出和处理问题，而不会进行报复。

4. PROTECT THE ENVIRONMENT AND COMMUNITY

4.1 ENVIRONMENT

Elementis Business Partners must take relevant steps to reduce their environmental footprint, including energy and water conservation, reduction of greenhouse gas emissions, pollution prevention, and waste minimization, reuse, and recycling practices.

Elementis Business Partners must meet all requirements of applicable environmental laws and regulations related to their products' development, manufacturing, and distribution.

Elementis Business Partners must consider the impacts of their decisions and activities on the environment.

We expect Elementis Business Partners whose operations have an impact on nature in their local environment to protect and restore nature, biodiversity and the resilience of natural ecosystems, including (but not limited to) ensuring zero illegal deforestation, zero deforestation in high risk areas and no expansion on peatland.

4. 保护环境和社区

4.1. 环境

Elementis 业务合作伙伴必须采取相关步骤减少其环境足迹，包括节约能源和水资源、减少温室气体排放、防止污染以及最小化排放、再利用和循环利用废物。

Elementis—业务合作伙伴必须满足与其产品开发、制造和分销相关的环境法律和法规的所有要求。

Elementis—业务合作伙伴必须考虑其决策和活动对环境的影响。

我们希望其运营对当地自然产生影响的—Elementis—业务合作伙伴致力于保护和恢复自然、生物多样性和提高自然生态系统的恢复能力，包括（但不限于）禁止非法砍伐森林、高风险地区禁止砍伐森林、禁止泥炭地扩张。

5. REPORTING CONCERNS

5.1 INTEGRITYCOUNTS SPEAK UP LINE

If you have a concern about something which may be illegal, unethical or unsafe, or not consistent with this Code or Elementis' policies and procedures, and you do not feel able to raise the matter with anyone at Elementis, you may raise it confidentially and anonymously to the IntegrityCounts line. This is open to all third parties.

This service is hosted independently of Elementis and is available 24 hours a day, 7 days a week, in multiple languages. You can fill in an online form or use one of the telephone numbers below:

- Brazil 0-800-761-1959
- China 400-120-8514



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

The website <https://integrity-counts.com/org/elementis> provides instructions on raising a concern.

5. 报告关注的问题

5.1. INTEGRITYCOUNTS 热线、畅所欲言

如果您对可能非法、不道德或不安全的事情有疑虑，或者发现与本准则或 Elementis 的政策和程序不一致的行为

，并且您觉得无法向 Elementis 的任何人提出此事，您可以秘密地、匿名地向 IntegrityCounts 热线提出。此热线是对所有第三方开放的。

此热线服务独立于Elementis托管，每周 7 天，每天 24 小时服务，支持多种语言。您可以通过填写在线表格或使用以下电话号码使用该热线服务：

- 巴西 0-800-761-1959
- 中国 400-120-8514
- 芬兰 0 800 915 702
- 德国 0-8001806718
- 印度 000-8001007980
- 马来西亚 +60 154-877 1090
- 荷兰 00-800-2002-0033
- 台湾 00-800-2002-0033
- 英国 0-800-092-3586
- 美国 1-866-921-6714
- 葡萄牙 +351-308-801-038

<https://integrity-counts.com/org/elementis> 网站提供有关热线报告的说明。

Please sign this Code on the next page

请在下一页签署本准则

AGREEMENT

I hereby acknowledge, on behalf of the Business Partner, that I have received, read and understand the requirements of the Elementis Business Partner Code of Conduct. I confirm, on behalf of the Business Partner, that I'm an authorized signatory of the Business Partner and the Business Partner will comply with the Business Partner Code and the laws referred to in the Business Partner Code.

BUSINESS PARTNER NAME:

SIGNATURE:

NAME:

TITLE:

DATE:

确认

我特此代表业务合作伙伴确认，我已收到、阅读并理解《Elementis 业务合作伙伴行为准则》的要求。我代表业务合作伙伴确认：我是业务合作伙伴的授权签字人，并且业务合作伙伴将遵守业务合作伙伴准则和准则中提及的法律。

业务合作伙伴名称:

签名:

姓名:

职位:

日期: