

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.

商業合作夥伴行為準則

我們的承諾

Elementis 及其集團旗下公司致力於確保「誠信是我們的特質」符合我們的安全，解決方案，雄心，尊重和團隊的價值觀。我們致力於遵守法律，確保在我們的業務和供應鏈中保護人權、高標準的道德行為和環境實踐。

作為此承諾的一部分，我們要求我們的供應商、分銷商和代理商（“Elementis 商業合作夥伴”）同意並遵守本商業合作夥伴行為準則（“業務合作夥伴準則”）。請在本末尾簽名或蓋章。

我們認識到，我們的供應商在全球不同的法律和文化環境中工作。本業務合作夥伴準則規定了基於國際標準的基本要求，作為與Elementis開展業務的條件，我們對Elementis的業務合作夥伴（包括分銷商，代理商，供應商，供應商，服務提供者，獨立承包商和顧問）的期望。Elementis致力於聯合國全球契約和國際勞工組織的《基本原則、權利和工作宣言》。

Elementis也承諾遵守《OECD跨國企業指引》，特別是其附錄2，該指引概述了相關風險，並為負責任採購提供了共同的理解基礎。我們期望我們的商業合作夥伴遵守這些指引，以確保在整個供應鏈中符合道德規範和永續經營。

商業夥伴準則由以下核心原則組成：

1. 提供安全健康的工作場所
2. 合法和合乎道德地行事
3. 促進尊重、公平和多元化的工作場所
4. 保護環境和社區

我們還希望 Elementis 商業合作夥伴為其自己的供應商和業務合作夥伴制定類似的準則或政策，涵蓋與本業務合作夥伴準則相同的原則。

如果任何人擔心本商業合作夥伴準則未被遵守，他們可以通過我們的 IntegrityCounts 熱線告知我們，其詳細資訊在本準則末尾。

通過按照本商業合作夥伴準則開展業務，我們都為我們周圍的每個人為社會和環境做出了積極貢獻。

《OECD跨國企業指南》的附錄2概述了負責任採購的風險並提供了理解負責任採購的共同基礎。負責任採購涵蓋侵犯人權、使用童工、強迫勞動、環境破壞以及腐敗和賄賂。該附錄還提供了盡職調查的建議，包括識別和評估供應鏈中的風險、實施策略以預防和減輕已識別風險的、追蹤這些策略的有效性、溝通風險的應對方式以及在適當的時候提供或配合補救措施。

來源：《OECD跨國企業指南》

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場所

1.1. 健康與安全標準

Elementis 商業合作夥伴必須達到或超過適用的健康和安全管理法規的要求。Elementis 商業合作夥伴必須保持安全、健康有保障的工作場所。任何住宅設施也必須安全、健康和有保障。工作區域必須符合預防事故、傷害和疾病的標準，並確保適當的衛生水準。Elementis 商業合作夥伴必須通過消除或盡量減少工作場所的危害來減少員工受傷和疾病的可能性。

1.2. 健康與安全培訓

Elementis 商業合作夥伴必須為員工提供相關的健康和安全培訓。

1.3. 健康與安全報告

Elementis 商業合作夥伴必須為其員工建立系統，以報告事故，傷害和不安全的做法或條件。Elementis 商業合作夥伴必須保留適當的事故和傷害記錄。

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. 法律合規

Elementis 商業合作夥伴必須遵守其開展業務所在國家/地區的適用法律和法規。如果適用法律與本業務合作夥伴準則中的規定相衝突，Elementis 商業合作夥伴必須遵守法律，同時力求滿足本商業合作夥伴準則中的原則。

2.2. 禁止賄賂和腐敗

Elementis 商業合作夥伴及其管理人員，董事和員工必須具有最高的道德商業行為標準。他們不得直接或通過第三方從事任何形式的賄賂或腐敗。我們希望Elementis商業合作夥伴通過制定自己的標準來促進其組織的反賄賂和反腐敗合規性，以幫助其組織和員工履行其法律義務，包括英國反賄賂法和美國反腐敗法。

2.3. 不當禮品、招待和娛樂不当礼品、招待和娱乐

Elementis商業合作夥伴不得向Elementis員工或代表提供可能被解釋為賄賂、造成利益衝突或看似衝突的禮物或招待。如果符合Elementis《行為準則》，《反賄賂和腐敗政策》以及《禮品和招待政策》，則可以允許適度的禮物和招待。Elementis商業合作夥伴不應向Elementis員工或代表提供：

- ☒ 任何違反相關法律的行為
- ☒ 在 Elementis 的公開招標或投標過程中提供的任何禮物和招待
- ☒ 現金或現金等價物，包括禮品卡
- ☒ 以娛樂為目的的旅行或過夜住宿
- ☒ 娛樂的提供者自己不參與的娛樂活動
- ☒ 任何奢侈或過度的東西
- ☒ 任何性、不道德或非法的禮物和招待
- ☒ Elementis 員工或代表索取的任何禮物和招待

2.4. 保密和隱私

Elementis商業合作夥伴必須尊重和保護Elementis的機密資訊（包括個人資訊）。Elementis商業合作夥伴只能將Elementis的機密資訊用於提供該資訊的用途。如果Elementis商業合作夥伴發現任何有意或無意的不當披露或使用Elementis的機密資訊，他們必須立即通知Elementis。Elementis商業合作夥伴必須遵守與個人資訊保護和使用相關的適用法律和法規。

2.5. 公平競爭

Elementis商業合作夥伴必須公平和合乎道德地開展業務，並遵守所有適用的公平競爭和反壟斷法。

2.6. 貿易制裁

Elementis商業合作夥伴必須遵守所有適用的貿易制裁和出口管制法律。

2.7. 採購和製造產品

Elementis商業合作夥伴提供的產品和材料必須經過適當和負責任的採購和測試。這些產品和材料還必須符合此類項目的品質和安全行業規範，以及我們之間商定的其他品質和安全標準。Elementis商業合作夥伴必須符合這些標準，並遵守所有法律和監管要求。這些要求既適用於商業合作夥伴直接向Elementis提供的商品或服務，也適用於通過第三方（如分包商）間接提供的商品或服務。

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. 促進尊重、公平和多元化的工作場所

3.1. 童工和青年工人

Elementis商業合作夥伴不得僱用童工。“兒童”一詞是指未滿 15 歲（或國家法律允許的 14 歲）或未滿該國最低就業年齡（以較大者為準）的任何人。僱用青年工人（超過最低就業年齡但未滿18歲的工人）的Elementis商業合作夥伴必須遵守有關工時，薪酬的適用法律和法規，並且必須避免可能對其教育、道德、身心健康、安全或發展有害的條件或限制。

3.2. 強迫勞動和人口販運

Elementis 商業合作夥伴不得使用任何形式的現代奴隸，人口販運或任何形式的強迫或強制勞動或從中受益。包括監獄勞工、債務勞工或契約勞工。不允許強制加班。

必須允許工人在給予合理通知後離職。不允許處以罰款、扣留身份證件（如護照）、工作許可證、報酬或要求招聘押金或其他限制作為就業條件。

Elementis 商業合作夥伴必須能夠檢查其分包商和供應商是否也遵守這些要求。

3.3. 尊重與尊嚴

Elementis 商業合作夥伴必須尊重和尊嚴地對待員工。他們不得進行任何形式的身體、口頭、心理或性虐待、騷擾或任何其他形式的恐嚇或不當行為。

3.4. 工作時間

Elementis商業合作夥伴必須遵守當地法律或合同約定的工作時間限制。在沒有限制的情況下，工人每周最多工作時間不得超過60小時，除非有特殊情況。工人必須在七天內至少休息一天，或依當地法律規定執行（以休息天數較大者為準）。必須允許工人享受任何法律要求的每日休息時間，並且不得要求將工作帶回家。

3.5. 工資福利和僱傭條件

Elementis商業合作夥伴必須向其員工支付公平的工資，其中包括生活費用，並遵守當地法律以及任何集體協定或合法的個人協定。Elementis商業合作夥伴必須為其員工提供任何法律規定的福利。不得因執行違紀措施將讓工人作為受到經濟處罰或非法扣除工人的福利金。工人應收到有關其工資和條件的明確書面資訊。

3.6. 多樣性、平等和包容

Elementis商業合作夥伴必須努力創造一個所有員工都感到安全，尊重，受重視並自由貢獻想法和觀點的工作場所。Elementis商業合作夥伴必須努力創造一個沒有騷擾和歧視的工作場所，並包容所有人及其獨特的能力，優勢和差異。

Elementis商業合作夥伴必須在就業的各個方面提供平等的機會，並且不得使其工人在招聘，僱用，薪酬，晉陞，獲得培訓，專業發展，退休或解僱方面受到任何非法歧視。任何僱傭決定都必須基於工人的能力，而不是基於個人特徵，例如種族、信仰、膚色、宗教、性別、年齡、國籍、外國人或公民身份、性取向、性別認同或表達、婚姻、伴侶關係或家庭狀況、殘疾、遺傳資訊、退伍軍人/軍人身份、家庭暴力受害者狀況、社會背景、種姓、健康情況、懷孕、或任何其他受法律保護的特徵。根據當地法律要求，具有相同資格、技能、經驗和績效的工人應獲得相同報酬。

3.7. 結社自由

Elementis商業合作夥伴必須承認員工自由結社的權利，並且必須遵守所有約束員工選擇或不選擇員工代表權利的當地法律。

3.8. 申訴程序

Elementis商業合作夥伴必須有有效的申訴程序，允許員工公平客觀地提出和處理問題，而不會進行報復。

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. 保護環境和社區

4.1. 環境

Elementis 商業合作夥伴必須採取相關措施來改善其環境足跡，包括節能和節水，減少溫室氣體排放，防止污染以及廢物最小化，再利用和回收實踐。

Elementis商業合作夥伴必須滿足與其產品開發、製造和分銷相關的環境法律和法規的所有要求。

Elementis業務合作夥伴必須考慮其決策和活動對環境的影響。

我們希望其運營對當地自然產生影響的Elementis商業合作夥伴致力於保護和恢復自然、生物多樣性和提高自然生態系統的恢復能力，包括（但不限於）禁止非法砍伐森林、高風險地區禁止砍伐森林、禁止泥炭地不擴張。

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

Unique chemistry,
sustainable solutions

- 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. 報告關注的問題

5.1. INTEGRITYCOUNTS 熱線、暢所欲言

如果您對可能非法、不道德或不安全的事情有疑慮，或者發現與本準則或 Elementis 的政策和程序不一致的行為，並且您覺得無法向 Elementis 的任何人提出此事，您可以秘密和匿名地向 IntegrityCounts 熱線提出。此熱線是對所有第三方開放的。

此熱線服務獨立於 Elementis 託管，每週7天，每天24小時服務支持多種語言。您可以通過填寫線上表格或使用以下電話號碼之熱線服務：

- 巴西 0-800-761-1959
- 中國 400-120-8514
- 芬蘭 0 800 915 702
- 德國 0-8001806718
- 印度 000-8001007980
- 馬來西亞 +60 154-877 1090
- 荷蘭 00-800-2002-0033
- 臺灣 00-800-2002-0033
- 英國 0-800-092-3586
- 美國 1-866-921-6714
- 葡萄牙 +351-308-801-038

該網站<https://integrity-counts.com/org/elementis> 提供有關提出問題的說明。

Please sign this Code on the next page

請在下一頁簽署此準則

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:

確認

我特此代表商業合作夥伴確認，我已收到、閱讀並理解《Elementis商業合作夥伴行為準則》的要求。我代表商業合作夥伴確認：我是商業合作夥伴的授權簽字人，並且商業合作夥伴將遵守商業合作夥伴準則中提及的法律。

商業合作夥伴名稱：

簽章：

姓名：

職稱：

日期：