

ELEMENTIS

Elementis PLC
Code of Business Conduct and Ethics

Revised May 2019

Preface

The Elementis Code of Business Conduct and Ethics (the “Code”) sets out our core values and the standards of conduct expected of everyone who works for Elementis in any of its worldwide operations.

The actions of every employee, officer and director affect the reputation and integrity of Elementis. Therefore, it is essential that each take the time to review this Code and develop a working knowledge of its provisions and where to find more information.

Values

Our Values guide each and every one of us in how we do our work, make decisions, serve our customers, protect our environment and treat each other. These values are at the center of everything we do, each and every day.

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; and
- Team – The Power of Collaboration
 - We work, grow and succeed together.

This Code is designed to promote these values by setting standards of behaviour that are expected of everyone involved in our business: employees, officers and directors, and other outside parties who represent Elementis.

The Code is based around five core principles of conduct:

- ✓ Behave with Honesty and Integrity
- ✓ Follow the Letter and Spirit of the Law
- ✓ Treat each other Fairly
- ✓ Act in best interests of Elementis
- ✓ Protect Elementis’ property & documents

Raising Questions and Concerns

Every employee, director and officer has an obligation under this Code to report possible violations of the law, this Code or any other company policies or guidelines.

Reporting Concerns

Reports of possible violations as required under this policy should be made:

- To a responsible supervisor or other appropriate internal authority; or

- By letter to the Elementis Legal Department, Elementis Global LLC located at 469 Old Trenton Road, East Windsor, New Jersey 08512 USA.

If an employee feels unable to raise the matter with anyone within the Company or has failed to obtain a satisfactory response, he or she may report suspected policy violations (confidentially or anonymously) to the 'AlertLine' operated by NAVEX Global ("NG") by telephone on the numbers below:

COUNTRY	ACCESS CODE	ALERTLINE NUMBER
US & Canada	N O N E	800-622-0981
UK	0-800-89-0011 or 0-500-89-0011	+ 800-622-0981
Netherlands	0-800-022-9111	+ 800-622-0981
Germany	0-800-225-5288	+ 800-622-0981
Belgium	0-800-100-10	+ 800-622-0981
Hong Kong	800-96-1111	+ 800-622-0981
Northern China	108-888	+ 800-622-0981
Central / Southern China	108-11	+ 800-622-0981
Malaysia	1-800-80-0011	+ 800-622-0981
India	000-117	+ 800-622-0981
Taiwan	00-801-102-880	+ 800-622-0981
Brazil	0-800-890-0288 or 0-800-888-8288	+ 800-622-0981
Finland	0800-9-13278	+ 800-622-0981
Other Territories	Visit AT&T's website http://www.business.att.com/bt/access.jsp	

Elementis will investigate all such reports and will take such steps as are necessary based on the outcome of any investigation.

Policy Against Retaliation

There will be no penalisation or detrimental treatment of any person who in good faith makes a report under this Code. Retaliation by others towards persons who have made a report will not be tolerated.

Provided that any matter raised by an employee is done so in good faith (i.e., the employee has a reasonable belief in its truth and does not act maliciously) then, even if following investigation the allegation is not upheld, the employee will not suffer any detriment as a result. The Company will take disciplinary action, up to and including termination of employment, against any employee or officer involved in retaliation. Every effort will be made to maintain confidentiality where requested, and details of the complaint will not be disclosed to third parties (including the incriminated person or the employee's line management). However, if a formal investigation is required, it may be necessary for the employee to discuss the matter with the person responsible for the investigation or for the employee's identity to be disclosed as part of any formal legal proceedings.

Raising Questions

The principles in this Code should enable you to deal with most situations that arise; however no policy can provide all the answers for every situation.

Whenever there are doubts about the right ethical or legal choice to make:

- Seek guidance from a supervisor about the right thing to do
- Fully disclose the circumstances
- Keep asking until guidance is obtained
- If necessary the Company's General Counsel or – in instances involving accounting practices, internal controls or audits – the Audit Committee are also avenues to consider.

Violations of the Code

Those who violate the standards in this Code or any other Company policy, or who violate any of the laws, rules and regulations that govern the Company's businesses, will be subject to appropriate disciplinary action up to and including termination of employment and may be subject to claims for damages or criminal prosecution.

A. Behave with Honesty and Integrity

It is essential that Elementis' business is conducted with honesty and integrity at all times. This Code encourages high ethical standards of fairness and respect in all business dealings including with customers, suppliers, distributors and with each other.

Fair Dealing

Each employee, officer and director should deal fairly with the Company's suppliers, customers, competitors and employees. No employee, officer or director should take unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice.

Respecting Confidentiality

We respect the confidentiality and privacy of our suppliers and customers. Information about the Company's suppliers, customers, competitors and employees must be used in an ethical manner and in compliance with the law.

We will respect and preserve any confidential or proprietary information shared with the Company unless disclosure is necessary to comply with statutory requirements or lawful requests or if the use is authorized by the originator of the confidential or proprietary information.

Clear and Professional Communication

We value clear, accurate and professional communications in all business dealings. In particular, customers and potential customers are entitled to receive accurate information regarding prices, capabilities, terms and scheduling. The Company strives to produce advertisements that are fair, accurate and lawful.

Preparing Accurate Records and Documentation

Our financial and other business records must be fair, accurate, timely, and reflect the underlying business transaction or activity.

Laws and regulations require the Company's records, including its financial, environmental, health and safety, research and development, analytical, engineering and intellectual property

records, to accurately reflect the events they represent. Transactions should always be recorded in a timely and accurate manner.

Proper records enable the Company to manage its resources effectively and meet the expectations of the people, for example shareholders, who rely on the accuracy of the Company's records.

Falsifying business records or failing to correct false records that you become aware of is a serious matter, which may result in criminal prosecution, civil action and/or disciplinary action up to and including termination of employment.

B. Follow the Letter and Spirit of the Law

As a global company we must comply with the laws of numerous countries in which we do business. All persons to whom this Code applies have a responsibility to know the laws that apply to them and to follow those laws.

We must also behave in a way that upholds the spirit and intent of those laws. If local laws conflict with this Code, please contact the Elementis Legal Department.

Some of the areas of law that are encountered frequently in most territories are explained below.

Maintaining a Safe, Healthy and Affirmative Workplace

The Company conducts its business worldwide with the highest concern for the health and safety of its employees, contractors, customers, neighbors and the general public and for the environment in which it operates.

The Company seeks to identify and eliminate occupational health hazards, is committed to providing a safe work place for all its employees and strives for zero injuries.

The Company aspires to best in class performance in all aspects of environmental management. It views compliance with all applicable legal requirements and legal codes of practice as its minimum standard and works pro-actively to reduce emissions and waste from its products and processes.

The Company supports the chemical industry's Responsible Care program and applies these principles in its worldwide operations. The Company recognizes the importance of communications with all interested parties and is committed to informing its employees, contractors, customers, neighbors and general public promptly of any significant hazards that arise from its operations.

All accidents, injuries, or concerns about unsafe equipment, practices, conditions or other potential hazards should be immediately reported to an appropriate supervisor or other internal authority.

Further information is available in the Elementis HSE Policy.

Trade Practices and Antitrust Compliance

In all regions where we operate we are committed to vigorous but fair competition for suppliers and customers.

Antitrust and trade regulation issues are very complex. In general these laws deal with the way in which companies interact with competitors, suppliers and customers. Failing to comply with these laws is a serious matter and whenever any doubt exists as to the legality of any communication, action, arrangement or transaction, please contact the Company's General Counsel immediately.

To avoid conflicting with anti-trust laws employees there are two golden rules:

- Do not communicate prices, costs, production, products and services, bidding practices, other non-public business matters, territories, distribution channels or customers with a competitor.
- Do not restrict the right of a customer to sell or lease a product or service at or below any price.

In addition, the following practices should not be engaged in without advance written approval by the Company's General Counsel:

- Conditioning the sale or lease of a product or service on the sale or lease of another product or service ("tying");
- Conditioning the purchase, sale or lease of a product or service on a reciprocal agreement with a customer or supplier;
- Entering into an exclusive dealing arrangement with a customer (including a lessee) or supplier;
- Limiting a customer (including a lessee) as to the territories in which, or the customers to whom, a product or service can be resold or leased; and
- Discriminating in the prices or allowances offered to competing customers (including lessees).

For more information, please refer to the Elementis Guidelines for Interacting with Competitors.

International Business Dealings

Specific laws and regulations apply to participation in international business. Employees and officers involved in business transactions must be fully familiar with, and strictly adhere to, all applicable foreign and domestic laws and regulations. These employees and officers must, at a minimum, be familiar with and comply with all applicable laws controlling exports or regulating with whom the Company and its employees may do business. These laws include export control and licensing laws, economic sanctions, anti-boycott laws, and various laws regulating the transnational movement of technology, goods and services. Questions regarding whether particular international transactions are permissible and compliance with applicable laws and this policy must be directed to the Elementis Legal Department.

Insider Trading and Fair Disclosure

Many countries have laws that restrict securities trading or other related activities by persons who are aware of material non-public information (i.e. 'inside information').

Material inside information is any information that has not been made public and, if made public, would be likely to be considered important by investors deciding whether to trade the Company's shares or other listed securities.

Any employee or director or officer who is aware of material non-public information relating to the Company must not:

- Trade in (buy or sell) Company securities including its shares.
- Disclose material inside information to others who may in turn trade in Company securities including its shares.
- Use the material inside information for personal advantage or the advantage of others.

The Company is required to maintain a list of all employees, officers or directors, together with any third party consultants or advisers, who have access to inside information. Where disclosure of inside information to a third party consultant or adviser is contemplated, the Company Secretary should be informed of the identity of the third party and the nature of the information, prior to disclosure.

Of course, where material inside information is permitted to be disclosed, the recipient should be advised of its non-public nature and the limitations on its use. Any questions as to whether information is material or non-public should be directed to the Elementis Legal Department.

Additionally, all employees, officers and directors must provide full, fair and accurate disclosure in all government filings and public communications.

For more information please refer to the Elementis Share Dealing Policy, the Share Dealing Code and the Elementis Disclosure Policy.

Bribery and Other Corrupt Practices

The Company strictly prohibits giving or promising, directly or indirectly, money or any other financial advantage to any person in order to obtain or retain business or to secure an improper advantage with respect to any aspect of the Company's business.

The Company is subject to the UK Bribery Act 2010, which (among other things) makes bribery a criminal offence when committed by a UK citizen in any country; the US Foreign Corrupt Practices Act, which makes it illegal for the Company's US subsidiaries and persons subject to US jurisdiction working for or on behalf of the Company to offer, pay, give, promise or authorize the payment of any money or of anything of value to any government official for the purpose of obtaining or retaining business or to secure an improper advantage; and comparable laws in other countries. Criminal actions under these laws include payments, both direct and indirect (for example through agents or contractors); gifts; entertainment; and certain travel expenses.

Further information is available in the Elementis Anti-Corruption Policy and the Elementis Anti-Corruption Guidelines: China.

Product Liability

Employees must ensure that Company products and services conform to all applicable laws, rules, regulations, specifications, test procedures or any other contractual requirements. Employees must never:

- Falsify, alter or distort any inspection or test documentation or software;

- Improperly or erroneously record inspection or test results;
- Use incomplete or improper inspection or testing protocols or procedures;
- Falsely certify or state that required inspections or tests were performed or that test documentation is available; or
- Mislead any customer's representative.

Political Contributions and Activities

The Company and its employees, officers and directors must comply with all applicable laws on political contributions.

Because there are strict restrictions and / or prohibitions on making such contributions in many of the countries where Elementis operates, no direct or indirect political contribution (including the use of Company property, equipment, funds or other assets) of any kind may be made in the name of the Company, or by using Company funds, unless the Company's General Counsel has approved this in writing.

C. Treat Each Other Fairly

The Company values its employees and strives to promote an environment where employees respect and trust each other and where there is protection from discrimination, harassment or unsafe practices.

Equal Opportunities

The Company is an equal opportunity employer and bases its recruitment, employment, development and promotion decisions solely on a person's ability and potential in relation to the needs of the job, and complies with local, state and federal employment laws.

The Company makes reasonable job-related accommodations for any qualified employee or officer with a disability when notified by the employee that he/she needs an accommodation.

Anti-Harassment

The Company is committed to a workplace that is free from sexual, racial, or other unlawful harassment, and from threats or acts of violence or physical intimidation. Abusive, harassing or other offensive conduct is unacceptable, whether verbal, physical or visual.

Any person who believes that they have been harassed or threatened with or subjected to physical violence in or related to the workplace should report the incident to an appropriate supervisor or Human Resources or the Elementis Legal Department, who will arrange for it to be investigated. All efforts will be made to handle the investigation confidentially.

Further information is available in the Elementis Non-Harassment Policy.

Anti-Slavery

The Company prohibits the use of forced or child labour and is committed to wider efforts to eliminate such practices from its global supply chains by communicating its policy to all suppliers and taking all reasonable action to ensure its compliance.

Offensive Materials

The Company will not tolerate the possession, use or distribution of pornographic, racist, sexist or otherwise offensive materials on Company property, or the use of Company personal computers or other equipment to obtain or view such materials. All employees and officers must promptly contact an appropriate supervisor or Human Resources or the Company's General Counsel about the existence of offensive materials.

Alcohol & Drugs

The Company is committed to providing a drug-free work environment. The illegal possession, distribution, or use of any controlled substances on Company premises or at Company functions is strictly prohibited. Similarly, reporting to work under the influence of any illegal drug or alcohol and the abuse of alcohol or medications in the workplace is not in the Company's best interest and violates this Code.

D. Act in Best Interests of Elementis

Conflicts of Interest

Employees, directors and officers have a duty to devote their full time and attention to the Company's business and to act in the best interests of the Company. Activities that are or may have the appearance of being in conflict with the interests of the Company should be avoided.

It is not always possible to avoid conflicts, so where a conflict exists or appears to exist, the nature of the conflict must be disclosed to a responsible supervisor, the Elementis Legal Department or other appropriate internal authority (including where necessary the Company's Board).

While it is not possible to describe or anticipate all the circumstances that might involve a conflict of interest, the following examples may help illustrate conflict situations:

- Engaging in direct or indirect financial interest in the Company's competitors, customers, suppliers or others dealing with the Company (excluding interests that are less than 1% of the outstanding securities of a publicly-traded corporation or equivalent percentage of ownership interests in an unincorporated business);
- Having a consulting, managerial or employment relationship in any capacity with a competitor, customer, supplier or others dealing with the Company; or
- Acquiring, directly or indirectly, real property, leaseholds, patents or other property or rights in which the Company has, or the employee, officer or director knows or has reason to believe at the time of acquisition that the Company is likely to have, an interest.
- Accepting loans or guarantees of obligations (except from banks of other entities that provide such services in the normal course and at arm's length) from any individual, organization or entity doing or seeking to do business with the Company. Any offer of such a loan should be reported to a responsible supervisor, the Company's General Counsel or other appropriate internal authority.

- Serving on any external board of directors or similar body of a for-profit enterprise or government agency without receiving prior approval from the Company.

(Note: Serving on boards of not-for-profit or community organizations does not require prior approval unless this would separately result in a conflict or potential conflict)

- Seeking any election or appointment to public office without prior approval of the Company.
- Soliciting contributions or other support from fellow employees, or distribute non-work-related material to fellow employees, during working hours or in areas where work is being performed.

Gifts and Hospitality

- The exchange or provision of gifts and hospitality may also create a real or perceived conflict of interest. In some circumstances lavish gifts and hospitality may also be viewed as a bribe.
- Employees, officers and directors and their families are prohibited from requesting, accepting or offering any form of financial or other advantage from or to our business partners unless it complies with the Elementis Anti-Corruption Policy and Elementis Travel, Entertainment & Expense Policy.

E. Protect Elementis' Property & Documents

Every employee, officer and director has a personal responsibility to protect the assets of the Company from misuse or misappropriation.

The assets of the Company include:

- Products, equipment and facilities.
- Corporate opportunities.
- Intellectual property, trade secrets and business information (including any non-public information learned as an employee, officer or director of the Company).

Theft/Misuse of Company Assets

The Company's assets may only be used for business purposes and such other purposes as are approved by the Company. No employee, officer or director may take, make use of, or knowingly misappropriate the assets of the Company without approval.

Corporate Reputation

Employees, directors and officers are expected to act and behave in a professional manner and not do or say anything to damage the reputation of the Company, the Board or its executive leadership.

You are required to comply with our separate Media Relations Policy.

Corporate Opportunities

Employees, officers and directors may learn of business opportunities through their association with the Company exposure to its confidential information that could be exploited for gain by themselves or others.

Because such opportunities and confidential information are or might become valuable assets of the Company, employees, officers and directors must not:

- Exploit, invest in or take advantage of such opportunities without first offering it to the Company.
- Disclose such opportunities to any person outside the Company.
- Disclosure any confidential information relating to such opportunities to any person outside the Company.

Furthermore, no employee, officer or director of the Company may participate in an initial public offering or otherwise accept special investment opportunities from a supplier, vendor (including banks or financial advisers) or customer with whom the Company is doing business or that is seeking to sell products or services to the Company without first disclosing the opportunity to the Company's General Counsel.

Confidential Information/Privacy

Confidential proprietary information is another valuable Company asset.

Confidential information includes all information however stored that has not been released to the public learned as an employee, officer or director of the Company. It includes, but is not limited to:

- Non-public information that might be of use to competitors, of interest to the press, or harmful to the Company or its customers, if disclosed;
- Non-public information about the Company's financial condition, prospects or plans, its marketing and sales programs and research and development information, as well as information relating to mergers and acquisitions, stock splits and divestitures;
- Non-public information concerning possible transactions with other companies or information about the Company's customers, suppliers or joint venture partners, which the Company is under an obligation to maintain as confidential;
- Non-public information about discussions and deliberations, relating to business issues and decisions, between and among employees, officers and directors; and
- Non-public information about fellow employees or any other individuals about whom the Company may hold information from time to time.

All employees, officers or directors of the Company have a responsibility to ensure that the confidentiality of the Company's information is maintained and must not, unless required to do so by law, in any way disclose confidential non-public information outside of the Company.

In addition, most countries have data privacy laws regulating the collection and use of personal data, which is any information that directly or indirectly identifies a natural person, although the types of data covered, the nature of the protection and local enforcement mechanisms vary. Examples of personal data include personal, employment, medical, financial and education and training information. All employees are responsible for ensuring compliance

with the data privacy requirements under the laws, rules and regulations of the respective countries.

Please refer to the Elementis Data Privacy Policy for further information.

Intellectual Property

Intellectual property is one of the Company's most valuable assets, and the Company also has the legal obligation to respect the intellectual property rights of others. Intellectual property includes patents, trade secrets, trademarks, copyrights and other proprietary information. It also includes software programs that are copyrighted or otherwise restricted, and designs for products like semiconductor chips.

Employees, officers and directors must vigorously protect the Company's own intellectual property rights as well as the rights of others. To protect the Company's property rights, you should fully document product development research and use appropriate Company trademark and copyright notices on all correspondence, articles, manuals or other papers. To avoid infringing on the intellectual property rights of others, you must never:

- Make unauthorized copies of software or photocopy magazine or journal articles or any other publications;
- Hire a competitor's employee to obtain that competitor's trade secrets;
- Affix the trademark of another company to goods without authorization; or
- Fail to remove another company's trademark when the goods or parts are remanufactured.

If you need to use intellectual property belonging to someone else, you must obtain a license to use the property or purchase the outright ownership of the property. In the case of property rights with an expiration date, such as patents, you must be sure that this date has passed if licensing or outright purchase is not feasible.

Network Use, Integrity & Security

You are required to comply with our separate Global Computer Use Policy.

Glossary of Terms

Term	Definition
Accounting Practices	Accounting Practices means full, fair and accurate disclosure in compliance with applicable accounting standards, laws, rules and regulations and full, fair, accurate, timely and understandable disclosure of information publicly announced by the Company under the UK Listing Rules, the UK Disclosure and Transparency Rules and the UK Prospectus Rules, and in other communications to securities analysts, rating agencies and investors.
Assets	The Assets of the Company include tangible assets, such as products, equipment and facilities, as well as intangible assets, such as corporate opportunities, intellectual property, trade secrets and business information (including any non-public information learned as an employee, officer or director of the Company).
Bribe	To Bribe means to offer, pay, give, promise or authorize the payment of any money or of anything of value to any person for the purpose of obtaining or retaining business or to secure an improper advantage. Bribes include payments, both direct and indirect (for example through agents or contractors), gifts, entertainment and certain travel expenses.
Confidential Information	Confidential information includes all information that has not been released to the public learned as an employee, officer or director of the Company. Examples of Confidential Information include - but are not limited to: <ul style="list-style-type: none"> - Non-public information that might be of use to competitors, of interest to the press, or harmful to the Company or its customers, if disclosed; - Non-public information about the Company's financial condition, prospects or plans, its marketing and sales programs and research and development information, as well as information relating to mergers and acquisitions, stock splits and divestitures; - Non-public information concerning possible transactions with other companies or information about the Company's customers, suppliers or joint venture partners, which the Company is under an obligation to maintain as confidential; - Non-public information about discussions and deliberations, relating to business issues and decisions, between and among employees, officers and directors; and - Non-public information about fellow employees or any other individuals about whom the Company may hold information from time to time.
Conflict of Interest	Any activity, agreement, business investment or interest or other situation that might in fact or in appearance cause the individual to place his or her own interests, or those of another, above his or her obligation to the Company. Examples of Conflict of Interest include situations where an employee, officer or director, or member of his or her family:- Solicits or accepts, directly or indirectly, from customers, suppliers or others dealing with the Company any kind of gift or other personal, unearned benefits as a result of his or her position in the Company including payment or reimbursement of travel and meal expenses (other than non-monetary items of nominal intrinsic value);- Has a financial interest in the Company's competitors, customers, suppliers or others dealing with the Company (excluding interests that are less than 1% of the outstanding securities of a publicly-traded corporation or equivalent percentage of ownership interests in an unincorporated business);- Has a consulting, managerial or employment relationship in any capacity with a competitor, customer, supplier or others dealing with the Company; or- Acquires, directly or indirectly, real property, leaseholds, patents or other property or rights in which the Company has, or the employee, officer or director knows or has reason to believe at the time of acquisition that the Company is likely to have, an interest.
Facilitation Payment	Facilitation Payments means payments or gifts made to government officials to expedite the performance of routine governmental actions (e.g., obtaining licenses, permits or other needed government documents).
Fair Dealing	Fair Dealing means that no employee, officer or director should take unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.
Gifts and Gratuities	Gifts and Gratuities means any form of under-the-table payment, kickback, bribe, rebate, barter or other improper payment or gratuity in connection with any corporate expenditure or sale of goods or services.

Government official	Government officials are any officer, employee or person acting in an official capacity for any government department, agency or instrumentality, including state-owned or -controlled companies, and public international organizations, as well as a political party, political official, or candidate for political office. Examples of Government Officials include professors or researchers from public universities or institutes; doctors from public hospitals and employees of state-owned telecommunication companies.
Inside Information	Inside Information is any information that has not been made public.
Intellectual Property	Intellectual property includes patents, trade secrets, trademarks, copyrights and other proprietary information. It also includes software programs that are copyrighted or otherwise restricted, and designs for products like semiconductor chips.
Material Inside Information	Material Inside Information is any information that has not been made public and, if made public, would be likely to be considered important by investors deciding whether to trade the Company's shares or other listed securities (e.g., earnings estimates, significant business investments, mergers, acquisitions, dispositions and other developments, expansion or curtailment of operations, and other activity of significance including matters which affect the market in which the Company operates).
Personal Data	Personal Data is any information that directly or indirectly identifies a natural person, although the types of data covered, the nature of the protection and local enforcement mechanisms vary. Examples of personal data include personal, employment, medical, financial and education and training information.
Privacy	Privacy is defined as an individual's right to keep aspects of his or her personal life secret. This includes an organization's responsibility to respect an individual's privacy rights and to manage personal information appropriately, including collection, use, storage, or disclosure of an individual's personal information. Each employee, officer and director must respect and protect any confidential or proprietary information shared with the Company unless disclosure is necessary to comply with statutory requirements, subpoenas, court orders or other lawful process or properly authorized government investigations, or unless the use is authorized by the originator of the confidential or proprietary information.
Records Retention Procedures	Destroying or altering a document with the intent to impair the document's integrity or availability for use in any potential official proceeding is a crime. Destruction of corporate records may only take place in compliance with the Records Retention Procedures. In addition, documents relevant to any pending, threatened, or anticipated litigation, investigation, or audit shall not be destroyed for any reason. Any belief that Company records are being improperly altered or destroyed should be reported to a responsible supervisor or appropriate internal authority immediately.
Slavery / Forced Labor	The modern concept of slavery varies from country to country. Slavery is a violation a person's basic human rights. A person will be considered to be in slavery if they are: - Forced to work through mental or physical threat - Owned or controlled by an 'employer', usually through mental or physical abuse - Dehumanized, treated as a commodity or sold or bought as 'property' - Physically constrained or has restrictions placed in his/her freedom of movement Slavery also includes human trafficking, forced labor, debt bondage, forced or servile marriage, descent-based slavery and the sale and exploitation of children.