



# Code of Conduct

Our Core Values In Action



# A Message from Ketjen's President

Michael J. Simmons

Our commitment to build a more resilient world drives not just what we do but how we do it. We work in close partnership with our customers, suppliers and communities to use our natural resources wisely, transforming these resources into products that benefit the planet now and in the future. We are accountable for our impact on people across our operations, continuously collaborating with our stakeholders to drive more positive outcomes for all.

I'm proud that our Core Values have driven our growth, earning us not just a thriving business but most importantly, a solid reputation. Our work must always be guided by our Core Values: Care, Curiosity, Collaboration, Humility, Accountability and Integrity. Our Code of Conduct demonstrates how to put our Core Values in action. Throughout this Code, you will see principles guided by our Core Values and organized by activity, so you can easily see how they apply in your day-to-day work.

Each of us has an internal compass guiding our ability to know right from wrong. We encourage you to be thoughtful about how that compass can help you navigate decisions at Ketjen. Remember, how we work is as important as what we sell.

Our work can be complex, and sometimes the right path forward may not be clear. If you are ever unsure what to do, put our Value of Humility in action by asking questions. It is also important to demonstrate Accountability, by speaking up when you see activity that conflicts with our Core Values or applicable laws. In this Code, we offer multiple ways for you to get help or report anything you, in good faith, think is wrong.

By committing to live by our Core Values and our Code, we build a stronger future for ourselves and everyone we humbly serve.

Best regards and be safe,

**MICHAEL J. SIMMONS**

President





# Our Core Values

# Our Core Values



## CARE

We improve the safety and support the well-being and resilience of our communities, employees, and environment.



## CURIOSITY

We continuously learn and are comfortable taking informed risks to innovate.



## COLLABORATION

We work together, value each other and encourage diverse thought to drive better outcomes.



## HUMILITY

We share the credit and value the ideas of others because we achieve goals together.



## ACCOUNTABILITY

We act with courage to take ownership for what matters and responsibly deliver results.



## INTEGRITY

We do what we say with honesty and transparency for the benefit of all.

# Navigating Our Code

<b>Start With The Code</b>	To Whom Does the Code Apply Making the Right Decision Asking Questions Accountability For Our Actions Demonstrate Care and Integrity By Speaking Up	<b>6</b>
<b>Speak Up</b>	Integrity Helpline Responding to Someone Who Speaks Up	<b>7</b>
<b>People</b>	Workplace Environment Our Suppliers Data Privacy	<b>10</b>
<b>Health, Safety &amp; Environment</b>	Working Safely & Looking After Your Health Life Saving Rules Environment	<b>14</b>
<b>Doing Business As a Global Company</b>	Anticorruption Gifts and Hospitality Conflicts of Interest Charitable Donations Political Contributions Competition and Trade Compliance Books and Records	<b>19</b>
<b>Our Assets</b>	Intellectual Property Company IT and Communication Systems Artificial Intelligence Social Media	<b>25</b>

# Start With The Code

## TO WHOM DOES THE CODE APPLY?

The Code applies to Ketjen Corporation, all Ketjen-controlled entities and their respective employees, officers and directors. We also expect suppliers, contractors, agents, distributors, joint venture partners and any others acting on our behalf to be familiar with our Code and to comply with [Ketjen's Code of Conduct for Business Partners](#) and applicable policies.

## MAKING THE RIGHT DECISION

The Code provides principles that guide our behavior, but it cannot address every situation you may face in your day-to-day activities. In addition to the Code, Ketjen also has a set of more detailed policies that details topics covered in this Code and can be found [HERE](#).

**When you are unsure about the right thing to do, ask yourself the following questions before acting:**

- Is my health and safety or the health and safety of others at risk?
- Am I acting consistently with our Core Values, this Code, our policies and applicable law?
- Am I authorized to do this activity?
- Do I feel comfortable doing this activity?
- What would my work colleagues, friends or family think if they knew what I was intending to do?
- Would I feel comfortable with my actions being reported on the front page of a newspaper?

## ASKING QUESTIONS

**Whenever needed, you can always get help from:**

- Your Supervisor
- Your HR Representative
- The Compliance Department
- The Legal Department

## ACCOUNTABILITY FOR OUR ACTIONS

To uphold our Core Values it is important that we are all held accountable for our actions. How you work is an essential part of your performance at Ketjen. This includes how you apply our Core Values and this Code in your daily work. Any violation of the Code, company policies or applicable laws may result in disciplinary action up to and including termination of employment. Ketjen may also voluntarily report potentially illegal behavior to law enforcement.

## SPEAKING UP

As part of our Core Values, we seek to foster a culture where employees and other stakeholders feel safe to raise any concerns related to Ketjen. Speaking up helps Ketjen to prevent harm, manage risk and promptly address issues.

If you have a concern, you are encouraged to **speak with your supervisor, local site leader or HR representative**. You can also contact:

- [ketjen.ethicspoint.com](http://ketjen.ethicspoint.com) or from your phone [ketjenmobile.ethicspoint.com](http://ketjenmobile.ethicspoint.com) (includes anonymous reports)
- The Compliance Department
- Email [integrity@ketjen.com](mailto:integrity@ketjen.com)

Remember that all concerns must be raised in **good faith** but:

- you do **not** need to have all of the facts
- the situation does not have to affect you personally
- do **not** assume that someone else will report it

## KETJEN'S INTEGRITY HELPLINE

The Integrity Helpline is operated by an independent company and can be contacted 24 hours a day, 7 days a week, in multiple languages by various means.

You are encouraged to give your name, contact information and as much detail as you feel comfortable providing (**though reports can be made anonymously**). Whether you choose to report anonymously or provide contact details, you will receive an access code to follow up on your report and message the investigator using a secure message portal.

Due to local privacy laws in certain countries and the European Union, the Integrity Helpline may allow only specific types of reports such as accounting, financial, auditing and bribery matters. In those countries, please contact your HR Representative, the Legal Department or Ethics and Compliance to report other issues.

You can find your country-related number below or visit [ketjen.ethicspoint.com](https://ketjen.ethicspoint.com).

**BELGIUM**  
0800 74 120

**KOREA, REPUBLIC OF SOUTH**  
744988

**BRAZIL**  
0212 038 3427

**NETHERLANDS**  
0800 0228370

**CHINA**  
400 820 3566

**SINGAPORE**  
8000120525

**FRANCE**  
0801 13 02 01

**THAILAND**  
18000120525

**HUNGARY**  
06 80 080 891

**UAE**  
8000120525

**INDIA**  
00080008 20279

**VIETNAM**  
024 5678 6037

**INDONESIA**  
021 30943376

**UNITED STATES**  
833 498 5485

**JAPAN**  
0800 123 9245

### RESPONDING TO SOMEONE WHO SPEAKS UP

If someone raises a concern to you, contact your HR representative immediately thereafter and report the situation. You can also contact Ethics & Compliance or the Legal Department. **Do not attempt to conduct an investigation yourself.**

### MANAGEMENT OF CODE INVESTIGATIONS

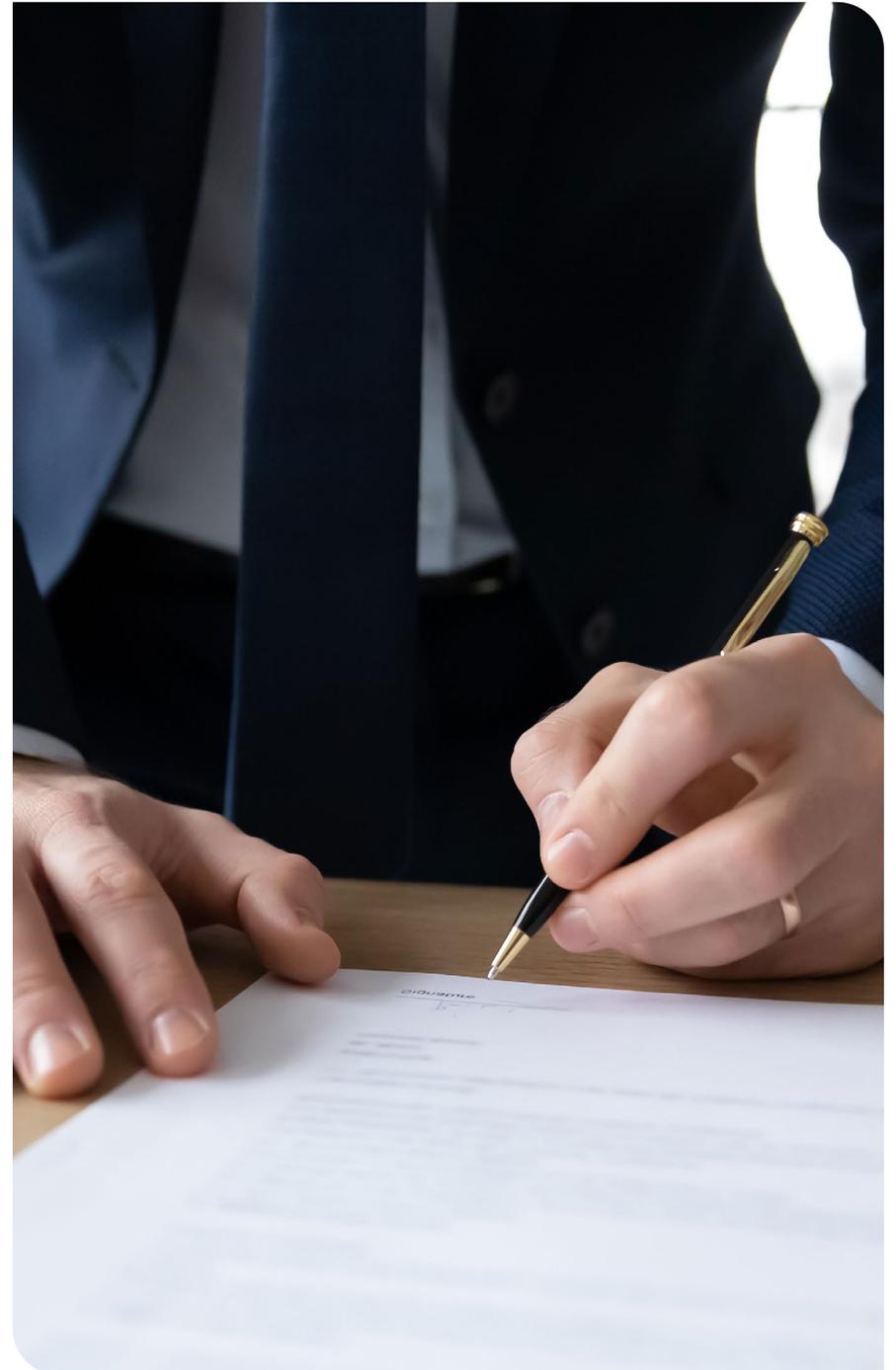
Allegations of violations of our Code are taken very seriously at Ketjen. We commit to: Conducting investigations objectively, promptly, discretely and thoroughly.

- Conducting investigations objectively, promptly, discretely and thoroughly.
- Respecting the privacy and securing the personal data of those who are affected by an investigation.
- Preserving the anonymity of those who report concerns, if they have so chosen and where appropriate.

Any violation of the Code, Ketjen's policies or applicable laws may result in disciplinary action up to, and including termination of employment.

### NO RETALIATION

We will not tolerate any direct or indirect acts of retaliation against an individual who in good faith reports a concern, including a suspected violation of this Code or applicable laws. This includes retaliation against anyone for participating in an investigation of suspected misconduct. We will investigate all allegations of retaliation and individuals who have engaged in retaliation will be disciplined up to, and including termination of employment.





**People**

**IN THIS SECTION**

**Workplace Environment**

**Our Suppliers**

**Data Privacy**



## Workplace Environment

We believe that people are our most valuable asset. We believe in creating an inclusive working environment where diverse views are encouraged and celebrated. Our day-to-day actions must align and embrace our Core Values of Care, Collaboration, Humility and Accountability.

When we uphold the principles of trust and mutual respect, we foster a culture of collaboration, performance, innovation and continuous improvement. We believe that having a diverse workforce makes us a stronger and more dynamic company.

- We treat our colleagues, customers, suppliers and other stakeholders with care, courtesy, fairness and respect.
- We do not tolerate discrimination of any kind.
- We do not engage in and do not tolerate any type of harassment, humiliation, bullying, retaliation or other forms of intimidation.
- We do not make and do not tolerate unwelcome or inappropriate physical or verbal advances, including but not limited to sexual harassment.
- We do not tolerate the display or sharing any offensive, threatening or demeaning materials at the workplace.

## Our Suppliers

We seek to ensure that prospective and existing suppliers comply with applicable laws, and supply with integrity by minimizing their adverse impact on the environment and local communities.

We ensure that our suppliers provide a safe and healthy workplace and respect basic human rights of their employees, as well as laws relating to conflict minerals, forced and child labor.

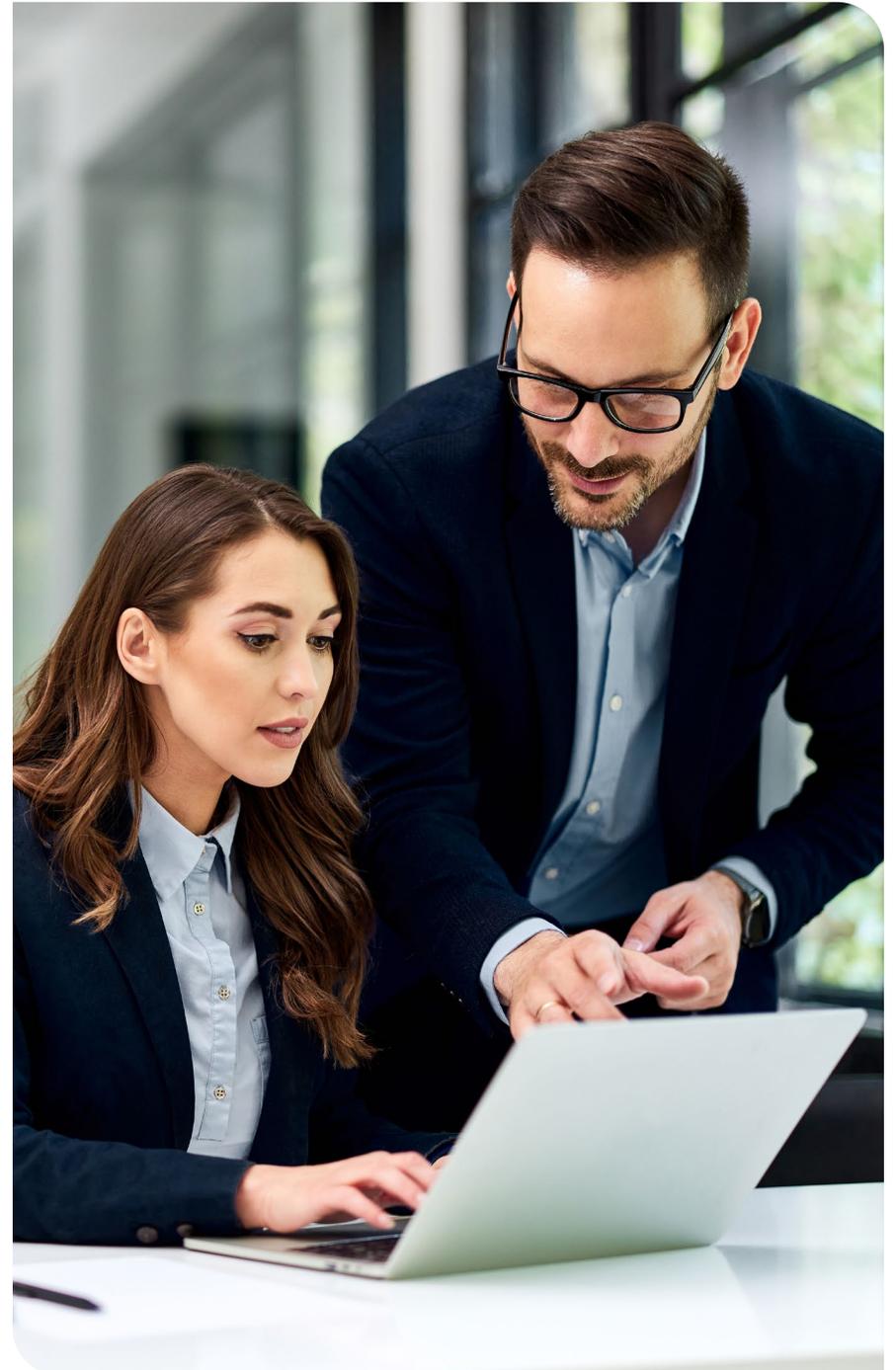
- We only conduct business with suitable and reputable business partners.
- We source responsibly from suppliers that meet our Core Values' expectations and share our commitment to respecting the rights of their stakeholders.
- We seek to procure locally where possible to support the economic and social development of our host communities.

## Data Privacy

Protecting personal data is fundamental to maintaining the trust of our employees, customers and business partners.

We are committed to handling personal information responsibly, transparently and in accordance with applicable data protection laws such as the EU General Data Protection Regulation.

- We collect and use personal data only for legitimate business purposes and take appropriate measures to safeguard it from unauthorized access, use or disclosure.





# Health, Safety & Environment

**IN THIS SECTION**

**Working Safely & Looking After Your Health**

**Life-Saving Rules**

**Environment**

## Working Safely & Looking After your Health

We care for the health and safety of employees, contractors, visitors and our host communities. We are committed to ensuring that everyone goes home safely and healthy every day.

This commitment is a personal and mutual responsibility that we take very seriously. We have a zero-tolerance policy for drugs, alcohol and weapons in the workplace.

- We follow and operate our sites in accordance with all applicable health and safety laws, in addition to our Life-Saving Rules, policies and site-specific rules and requirements.
- We only commence work if we are adequately fit, sufficiently rested and free from the influence of alcohol, illegal drugs, exhaustion or medication that impairs our ability to work.
- We do not bring any kind of weapons or other threatening objects to the workplace.



# Life-Saving Rules



## WORK PERMIT

I obtain permits before work begins and abide by the controls.



## LOCK OUT TAG OUT

I identify, isolate, and test all energy sources, before work begins.



## LINE BREAK

I verify control of hazardous energy before line break.



## CONFINED SPACE

I obtain authorization by permit prior to entering confined spaces.



## WORKING AT HEIGHTS

I work safely at heights, using appropriate fall protection.



## PPE

I wear all of the prescribed Personal Protective Equipment (PPE).



## ELECTRICAL

I only use proper, inspected and protected electrical equipment.



## SAFETY CONTROLS

I obtain authorization before overriding, modifying or disabling safety controls.

## SAFETY

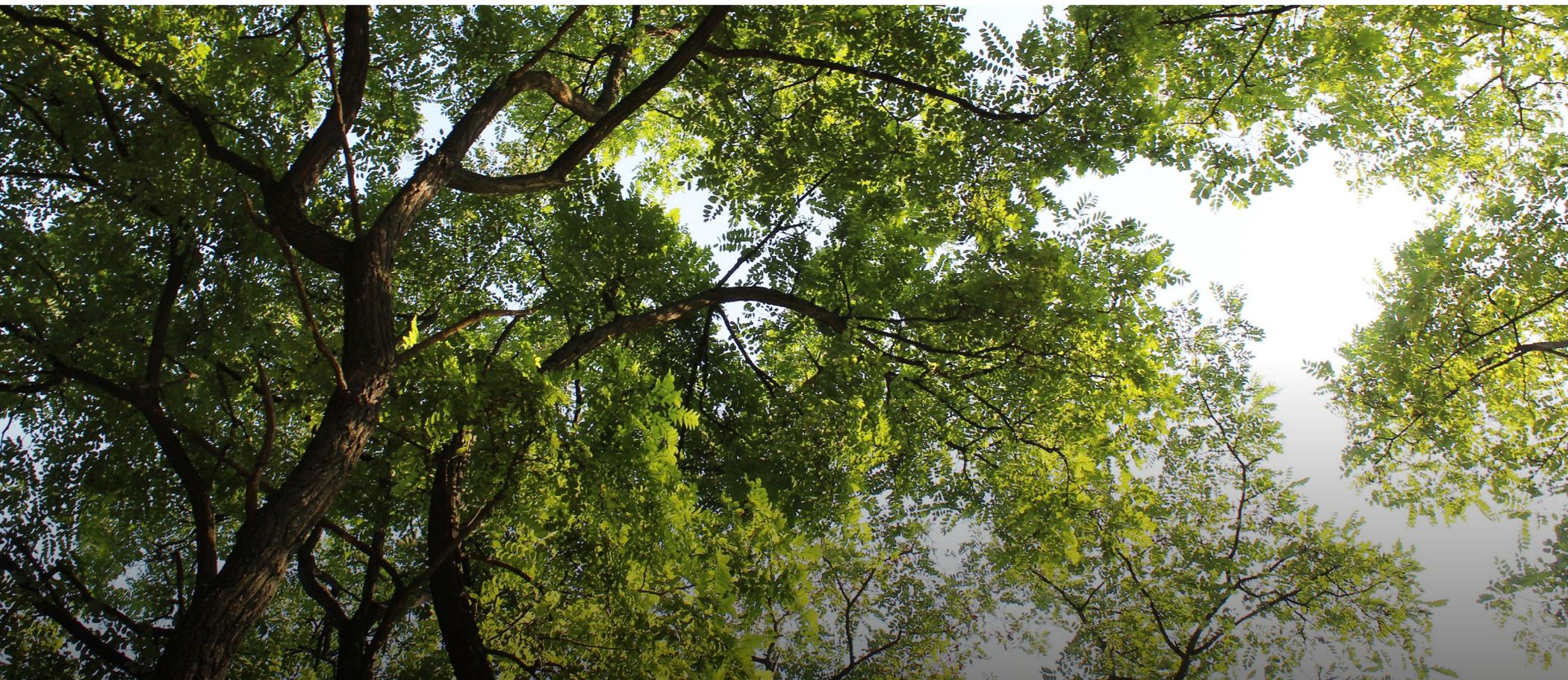
Safety Is Everyone's Responsibility.

Know the Rules.  
Follow the Rules.  
Save Lives with the Rules.

# Environment

We seek to minimize the environmental footprint of our operations through careful management of energy and emissions, water, waste and raw materials. We believe that it is our duty to manage resources responsibly.

- We comply with all applicable environmental laws, regulations, operating permits and our own environmental policies.
- We seek to ensure our business partners follow all applicable laws, as well as appropriate environmental standards and practices.





# Doing Business as a Global Company

**IN THIS SECTION**

**Anticorruption**

**Gifts and Hospitality**

**Conflicts of Interest**

**Charitable Donations**

**Political Contributions**

**Competition and Trade Compliance**

**Books and Records**

## Anticorruption

We are committed to conducting business with integrity and respect for diverse laws and cultures while upholding consistent and strict ethical standards. We comply with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (“FCPA”), wherever we do business. We have a zero-tolerance policy for bribery and corruption in any form, whether involving public officials or private parties.

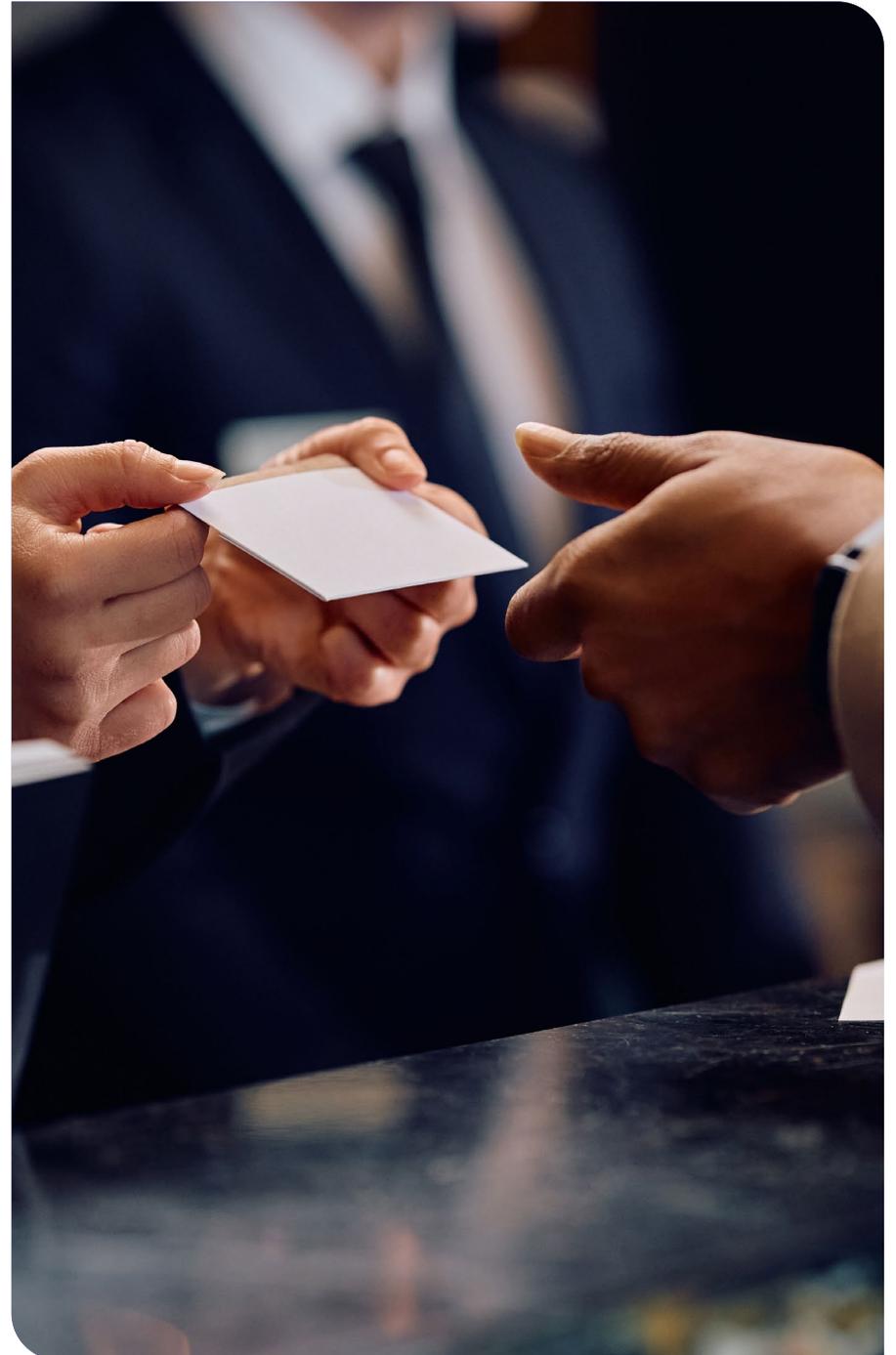
- We do not tolerate any form of bribery and corruption (including kickbacks, facilitation or “grease payments” and any kind of illegal payments), whether by our employees, suppliers, third-party intermediaries or anyone else acting on our behalf.
- We carefully select our third-party intermediaries, and appropriately monitor their conduct

## Gifts and Hospitality

We respect local cultures and understand that giving or receiving gifts of nominal value, reasonable meals or entertainment can sometimes be a part of maintaining and developing business relationships.

However, we only offer or accept gifts, hospitality or anything else of value when (i) there is a genuine business purpose, (ii) it is in the ordinary course of business, (iii) of a reasonable value and (iv) it is infrequent.

- We do not offer or accept gifts, hospitality or anything else of value if it could affect, or be perceived to affect, our business judgment or assist us in gaining a business advantage.



## Conflicts of Interest

We respect our employees' rights to pursue outside activities and interests. However, a conflict of interest can arise when employees have a personal interest in a transaction or situation that could affect their business judgment, or loyalty to Ketjen .

- We proactively disclose any potential conflict of interest, even if we think it will have no influence on our judgment or performance.
- We do not engage in situations where personal activities, interests or relationships could affect, or be perceived to affect, our decision-making or work performance.
- We do not engage in outside interests that compete with Ketjen.

## Charitable Donations

Charitable donations are a way for Ketjen to contribute to worthy causes and are consistent with our Core Value of Care. We seek to ensure that such funds are paid to the authorized recipient and spent in accordance with our charitable intent.

- We do not offer or provide charitable donations directly or indirectly with the intent to improperly influence any person (including a government official) to gain business or an improper advantage.
- We do not make charitable donations to inappropriately benefit ourselves or our spouse, partner, relatives, friends or associates.
- We make no charitable donations to organizations with goals incompatible with our Core Values or that would otherwise damage our reputation.



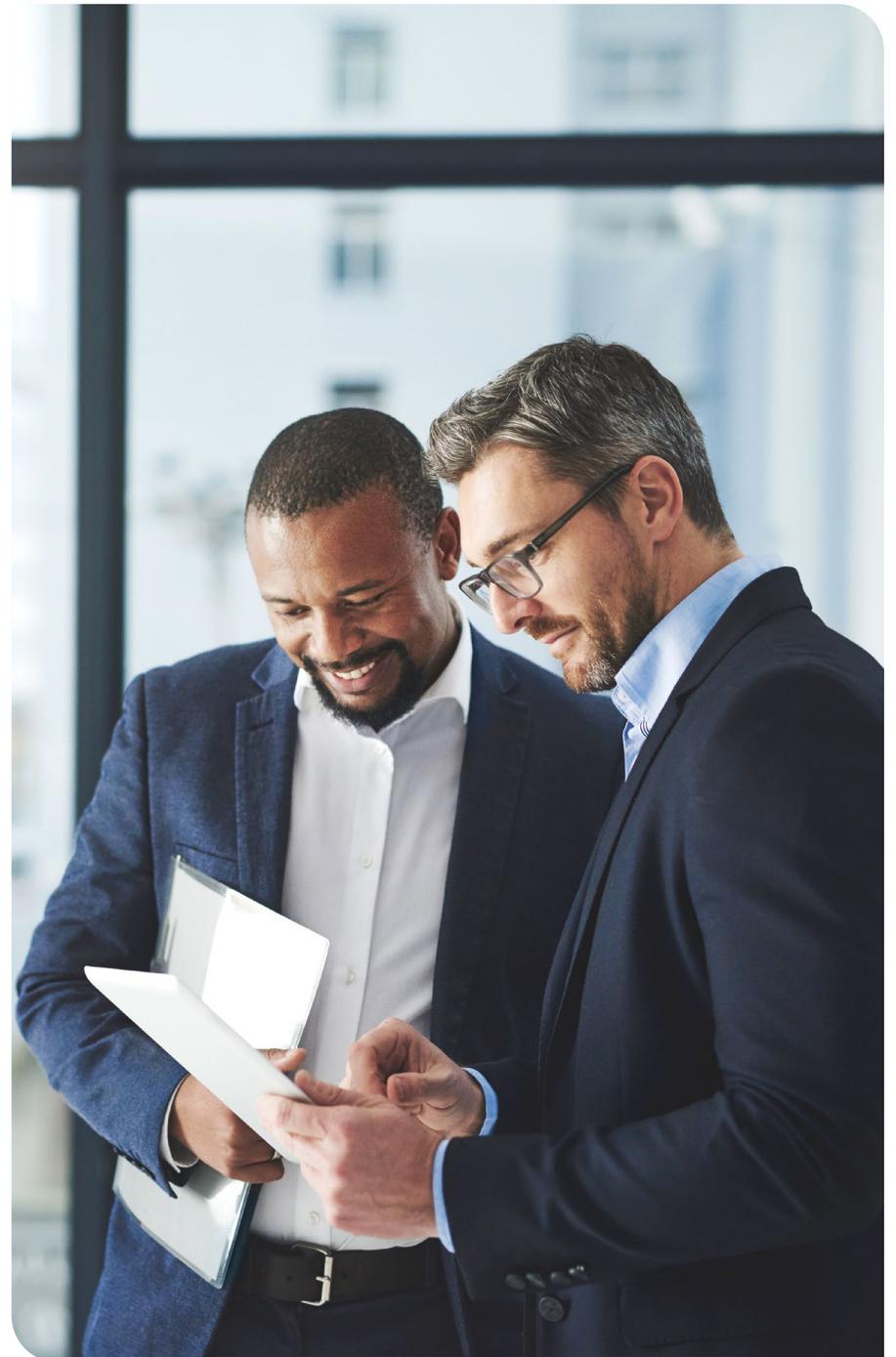
## Political Contributions

Ketjen does not make any kind of political contributions, but we respect and encourage the right of our employees to participate in the political process, through personal contributions or by volunteering their personal time to candidates or organizations of their choice, provided it does not affect an employee's work or involve the use of Ketjen's assets and resources.

## Competition and Trade Compliance

We believe in the principle of free trade. We are committed to vigorous but fair competition and act independently of our competitors. We comply with all applicable competition and trade compliance laws and regulations.

- We do not agree with competitors to fix, raise, lower or stabilize prices of goods that we sell.
- We do not fix other competitive terms such as pricing formula, sales terms, surcharges, discounts, margins, costs, rebates, commissions or credit terms with competitors.
- We do not agree with competitors to limit production, production capacity or capacity utilization.
- We do not rig bids or otherwise illegally coordinate bidding or tendering activities with competitors.
- We do not allocate markets, customers, suppliers or geographic territories with competitors.



## Books and Records

To maintain the trust of our investors and shareholders, we must make good decisions and provide financial information that is accurate and complete.

Ketjen maintains internal controls to ensure that our books and records fully and objectively reflect our business and financial transactions and their underlying business purpose in a materially accurate manner. We only execute transactions in accordance with this Code, applicable laws and our policies. It is our personal responsibility to know those requirements.

- We do not create false, incomplete or misleading entries in our books or records.





# Our Assets

**IN THIS SECTION**

**Intellectual Property**

**Company IT and Communication systems**

**Artificial Intelligence**

**Social Media**

## Intellectual Property

Our ideas, innovations and confidential information set us apart from our competitors. Our intellectual property is one of our most valuable assets as it gives us a competitive edge and reflects the expertise and creativity of our employees.

All intellectual property created during the course of work for Ketjen, or otherwise based on Ketjen's information, belongs to Ketjen. Such intellectual property is a Company asset and must be used, protected and disclosed appropriately. We must similarly respect the intellectual property of others.

- We take appropriate steps to protect Ketjen's intellectual property.
- We do not disclose non-public Ketjen intellectual property to third parties.
- We respect the intellectual property of others and only use it when authorized and in a manner consistent with such authorization.

## Company IT and Communication Systems

Ketjen's computer hardware, software and phones must be used appropriately to prevent unauthorized access to our IT and communications systems or inappropriate disclosure of Ketjen information.

- We do not share network passwords with anyone, including supervisors, IT or third parties.
- We do not use personal email accounts or social media applications for proprietary or sensitive work-related communication.



## Artificial Intelligence

As we integrate artificial intelligence (AI) into our daily jobs, we commit to use this tool ethically, transparently and responsibly. We only use AI in ways that align with our Core Values of Care, Accountability and Integrity. AI is not infallible and we only use AI to support, not replace, critical human judgment.

- We ensure human oversight as part of AI use and decision-making process.
- We do not use AI to make decisions that may significantly affect individuals without appropriate and thorough human review.
- We protect sensitive, confidential and proprietary information of Ketjen, our employees and third-parties when using or interacting with AI tools and ensure that confidential data is not entered into public or unapproved AI systems.

## Social Media

Social media offers us a chance to connect and share content about Ketjen with the online community. We protect Ketjen's reputation through posting on social media with care, humility, integrity and transparency.

- We do not post vulgar, obscene, threatening, intimidating, recklessly false or harassing content, content portraying us as appearing to engage in illegal conduct, or content that disparages Ketjen's products or services or its employees, customers, suppliers or competitors.
- We promote productivity by refraining from using social media during work hours, except when used for business purposes.



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