

An opening note from Trevor Russell, CEO

Our vision is to be a world class specialty chemical company, and this means world class in all aspects of our operation, including the way we conduct our business. The methods we employ to attain results are as important as the results themselves. Therefore, our colleagues and contractors are expected to operate to the highest ethical standards delivered through a set of shared principles.

Our reputation and the future success of Infineum are dependent on everyone complying with the principles laid out in the Infineum Code of Conduct, and this is something that we believe extends to our supply chain.

Sustainability is one element of these principles and is at the heart of our strategy and purpose “to create a sustainable future through innovative chemistry” and our suppliers play a vital role in this.

As a responsible corporate citizen, we care for the people we serve and the ones with whom we work. Therefore, we hold ourselves and our partners to the same high standards through our Supplier Code of Conduct. We expect our suppliers to live these principles, or similar ones, to ensure sustainable, long-term and successful relationships that further our purpose and reflect our integrity.

Introduction

Sustainability sits at the core of Infineum’s organisation, vision, strategy and purpose; to create a sustainable future through innovative chemistry. All suppliers play a vital role in our business and are expected to share the same principles as us to ensure sustainable, long-term and successful relationship for all parties.

This **Supplier Code of Conduct** outlines the requirements suppliers are expected to comply with in their business transactions with Infineum and is based on the ten principles of the United Nations Global Compact Initiative, the International Labour Organisation (ILO) conventions, the Responsible Care® program and Infineum’s internal Code of Conduct.

Suppliers are also expected to operate in full compliance with applicable laws, as well as relevant internationally recognised environmental, social and governance standards.

This code applies to direct suppliers, as well as any of their subsidiaries, affiliated companies and sub-contractors involved, in providing goods or services to Infineum. Therefore, suppliers are expected to assure cascade of this code to all suppliers and business partners that participate in their delivery of goods and services to Infineum and monitor that they act in accordance with the principles set out in this code.

Any violations of this code of conduct may jeopardize supplier’s business relationship with Infineum. This code of conduct will be reviewed annually, and any amendments will be shared with suppliers.



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Section 1: Conducting Business

Infineum expects the highest standards of ethical conduct from all its suppliers. Suppliers are required to comply with all laws, rules, regulations and treaties applicable to the products and/or services provided to Infineum in all locations where its business operations are conducted. These include, but are not limited to, laws related to anti-bribery and corruption, anti-trust, environmental standards, occupational health and safety, and labour. Please refer to [Infineum Business Ethics Policy](#) for more detail.

- 1.1 **Compliance:** Supplier is required to comply with international laws and regulations on human rights (ILO's Fundamental Principles), international trade (export controls, sanctions and reporting obligations) and data protection. Please refer to [Infineum Policy on International Trade](#) for more detail.
- 1.2 **No Bribery/corruption:** All forms of bribery, corruption, extortion or embezzlement are prohibited in all commercial dealings. Any gifts and hospitality offered to Infineum employees must be in line with Infineum's business ethics policy.
- 1.3 **Responsible Sourcing of Materials:** Suppliers are expected to conduct appropriate due diligence within their own supply chain in connection with the materials (including plant and animal derived material) and the processing levels incorporated into products and/or services supplied to Infineum order to determine whether relevant materials originate from regions with high risks. These high-risk areas include those associated with conflict, child labour, forced labour and human trafficking, human rights violations, bribery and corruption or other reasonably objective high-risk activities, including severe health and safety risks and negative environmental impacts.
- 1.4 **Protection of Intellectual Property:** Suppliers shall respect intellectual property rights of third parties and safeguard customer confidential information. Suppliers shall manage technology and know-how that it receives in a manner that protects those intellectual property and confidentiality rights. Suppliers will not make public any reference to or details of its business transactions with Infineum, without Infineum's prior consent.
- 1.5 **Financial Management:** Suppliers will have a robust internal controls system and must record all commercial dealings accurately and transparently in its record-keeping systems. Suppliers shall not conduct any money-laundering activities.
- 1.6 **Conflict of Interest:** Suppliers must avoid any situation where a conflict of interest is present between Infineum and Suppliers.



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- 1.7 **Whistle-Blower Protections:** Suppliers must protect whistle-blower confidentiality and prohibit retaliation against employees who report workplace violations of law, and non-compliance. Suppliers must create a mechanism for employees to submit their reports for these to be investigated and addressed.
- 1.8 **Fair competition:** Suppliers shall compete in a fair manner in compliance with all applicable antitrust laws and regulations and shall have standards and procedures in place to ensure that its directors and employees do not engage in any anti-competitive practices.

Section 2: Human Rights and Labor Practice

Infineum believes all employees in its supply chain deserve a fair and ethical workplace. Employees must be treated with dignity and respect and Infineum's suppliers shall uphold human rights standards and not be complicit in human rights abuses. As a minimum, suppliers are required to comply with all applicable laws and regulations regarding working conditions and labour standards. Where local laws are less stringent than the ILO's Fundamental Principles, the ILO's Fundamental Principles will apply. Please refer to [Infineum Business Ethics Policy](#) for more detail.

- 2.1 **No Forced/Child Labour:** Suppliers shall ensure that all work carried out for it is voluntary rather than forced and that all employees meet the minimum legal age requirements of the country to work. Please refer to our Statement on Human Rights and Modern Slavery for more details.
- 2.2 **Employment terms:** Suppliers shall provide its employees with written and understandable information in their local language about their employment conditions with respect to wage, benefits and working hours. Employees shall be paid at least the minimum legal wage or better and receive annual leave and public holidays in accordance with local law.
- 2.3 **Freedom of Association:** Suppliers shall respect its employees' right of freedom of association, including the right to collective bargaining, the right to join a trade union and all other workplace rights as mandated by legislation.
- 2.4 **No discrimination and harassment:** Suppliers shall not discriminate directly or indirectly against its employees in relation to compensation, access to training, promotion, termination, retirement or any other aspect of their work, whether based on race, religion, age, disability, gender, sexual orientation, political opinion, or any other characteristic that might give rise to discrimination. Suppliers shall prohibit any form of harassment by or towards its employees, contractors, suppliers or customers.



- 2.5 **Protect employee privacy:** Suppliers shall protect its employees' privacy in accordance applicable laws.

Section 3: Health and Safety

Suppliers shall provide and maintain a safe work environment and integrate sound health and safety management practices into their businesses. Employees shall have the right to refuse unsafe work and to report unsafe working conditions.

- 3.1 **Health and Safety Permits:** Suppliers shall obtain, keep current and comply with all required permits and laws regarding health, safety, security and hygiene. Suppliers shall have a structured health and safety management system in place.
- 3.2 **Investigation:** Suppliers shall put in place processes to record and investigate accidents, near misses and first-aid events. This investigation shall include a root cause analysis and preventative and corrective actions to prevent reoccurrence.
- 3.3 **Safe Working Environment:** Suppliers shall routinely assess and monitor its work environment for health, well-being and safety hazards and eliminate, control or mitigate these identified risks. Suppliers shall provide employees with appropriate workplace health and safety training in their primary language. Suppliers shall issue its employees with the necessary personal protective equipment, at no cost, to protect their health and safety.
- 3.4 **Emergency Response:** Suppliers must identify and plan for emergency situations and implement and train its employees on response systems, including emergency reporting, alarm systems, employee notification and evacuation procedures, employee training and drills, first-aid supplies, fire detection and suppression equipment, and accessible exit facilities.
- 3.5 **Contractor Management:** Suppliers will have health and safety processes to ensure effective contractor management.
- 3.6 **Alcohol and drug:**
Suppliers shall put in place an appropriate alcohol, drug or other substance policy, which consists of making sure there is no abuse by employees such that it impairs their ability to perform their duties and/or have serious adverse effects on the safety, efficiency, and productivity of others around them and Suppliers' activities as a whole.
- 3.7 **Life Saving Rules:**
Suppliers must respect Infineum Life Saving Rules when present at an Infineum location or handling Infineum products, as they are the basis of safety for working with Infineum.



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Section 4: Environment and Sustainability

Suppliers must comply with all applicable environment, health and safety laws and regulations and ensure that necessary permits are in place. Suppliers should promote safe and environmental sound development, manufacturing, transport, use and disposal of products.

4.1 Respect for the Environment

Suppliers shall support a precautionary approach to environmental challenges and undertake initiatives to promote greater environmental responsibility. Suppliers shall be committed to efficient use of raw materials, energy and other natural resources while minimizing negative impact on climate, biodiversity, waste and waste. Suppliers shall care about communities they operate in and engage with them on their concerns. Suppliers shall apply energy-efficient and environmentally friendly technologies in their production and services.

4.2 Monitoring and continuous improvement

Suppliers are expected to implement appropriate environmental management policies to reduce environmental impact of their operations. Suppliers shall have systems in place to monitor, control and appropriately treat wastewater, air emissions and waste generated from its operations including the treatment of hazardous waste in compliance with applicable legislations.

Suppliers shall continually evaluate and improve their products, working methods, production processes and services and ensure that these changes are executed in a controlled way.

4.3 Quality and Safety of products

Suppliers must ensure products supplied to Infineum are manufactured and distributed in accordance with applicable laws. Suppliers must comply with product safety regulations, label product properly and communicate product-handling guidelines. Suppliers shall engage in activities that reuse and recycle where possible. Suppliers shall have appropriate management systems in place to assure product quality and safety.

Any non-compliance with this Code of Conduct should be reported to Infineum. Infineum reserves the right to audit compliance with this Policy. Such audits are conducted by Infineum staff or another approved monitoring firm.



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Appendix:

International Labour Standards - Eight fundamental Conventions:

1. Freedom of Association and Protection of the Right to Organise Convention, 1948 (No.87)
2. Right to Organise and Collective Bargaining Convention, 1949 (No. 98)
3. Forced Labour Convention, 1930 (No. 29) □ (and its 2014 Protocol)
4. Abolition of Forced Labour Convention, 1957 (No. 105)
5. Minimum Age Convention, 1973 (No. 138)
6. Worst Forms of Child Labour Convention, 1999 (No. 182)
7. Equal Remuneration Convention, 1951 (No. 100)
8. Discrimination (Employment and Occupation) Convention, 1958 (No. 111)



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