

Business Partner Code of Conduct

Effective June 2026



Introduction

At Nouryon, we believe that responsible business conduct is fundamental to long-term success. Our core values—We Aim High, We Own It, and We Do It Right—guide everything we do. We expect our business partners to share these values and to conduct their operations in a manner consistent with the principles outlined in this Business Partner Code of Conduct.

This Code applies to all business partners, including suppliers, distributors, agents, contractors, consultants, and any other third parties acting on behalf of or providing goods or services to Nouryon (collectively, "Business Partners"). We expect Business Partners to implement these standards within their own operations and to ensure their own suppliers and subcontractors adhere to equivalent standards.

We are committed to working with Business Partners who share our commitment to ethical business conduct, human rights, environmental protection, and continuous improvement. This Code reflects our expectations and provides a framework for our partnerships. Specifically, we expect our Business Partners to adhere to the following standards:

Governance

1. **Comply with Applicable Laws.**

Business Partners must comply with all applicable laws and regulations of the countries where they operate, including anti-corruption laws, anti-money laundering laws, customs regulations, export and trade control laws, sanctions and embargoes, competition, antitrust and fair dealing laws, data protection and privacy laws, and labor and employment laws.

Business Partners must not engage in any transaction or business activity with: (a) any person, entity, country, or territory subject to sanctions under applicable law; or (b) any entity that is directly or indirectly owned 50% or more, or otherwise controlled, by a sanctioned person or entity. Business Partners must implement screening procedures sufficient to ensure compliance with all applicable trade controls and sanctions requirements.

Business Partners must prohibit all forms of bribery, corruption, and extortion.

Business Partners must comply with all applicable anti-money laundering, anti-terrorist financing, and sanctions laws, and implement appropriate controls to prevent money laundering and terrorist financing.

2. **Conduct Business Ethically**

Business Partners must not offer or provide any improper payment, kickback, bribe, or anything of value to obtain or retain business, secure an improper advantage, or influence a business decision. Business Partners are also prohibited from providing Nouryon employees with anything of value (including meals, gifts, or entertainment) intended to improperly influence a business decision. Business courtesies of nominal value may be accepted by Nouryon employees only if permitted under applicable law and Nouryon's Meal, Gift & Business Entertainment Policy. Business Partners must maintain accurate books and records of all transactions, including but not limited to meals, gifts, entertainment, and related payments.

Business Partners must avoid conflicts of interest and promptly disclose to Nouryon any actual or potential conflicts, including any ownership interest, financial relationship, or personal relationship between Business Partner personnel and Nouryon employees that could influence business decisions.

Avoid Anti-competitive Behavior: Business Partners must comply with all applicable competition and antitrust laws at all times. This includes not sharing unnecessary commercially sensitive information of the Business Partner or third parties with Nouryon.

Social

3. **Respect Human Rights**

Business Partners must respect human rights and maintain workplaces that uphold the dignity and well-being of all workers. Specifically, Business Partners must:

a) **Prohibit Forced Labor and Human Trafficking:** Business Partners must not use or benefit from any form of forced labor, including prison labor, indentured labor, bonded labor, or human trafficking. Workers must be free to leave employment upon reasonable notice without penalty. Business Partners must not retain workers' identity documents or charge recruitment fees to workers. Business Partners must not supply Nouryon with any goods or materials produced, in whole or in part, using forced labor.

b) **Prohibit Child Labor:** Business Partners must not employ anyone below the legal minimum working age. Young workers must not perform work that is hazardous to their health or safety.

c) **Ensure Non-Discrimination and Fair Treatment:** Business Partners must provide equal employment opportunity and must not discriminate based on any legally protected characteristic. Business Partners must treat all workers with dignity and respect and must not tolerate harassment, abuse, or intimidation.

d) **Respect Freedom of Association:** Business Partners must respect workers' lawful rights to freedom of association and collective bargaining.

e) **Provide Fair Compensation:** Business Partners must compensate workers in compliance with applicable wage and hour laws, including minimum wage and overtime requirements, and provide all legally mandated benefits.

f) **Maintain Reasonable Working Hours:** Business Partners must comply with applicable laws regarding working hours, overtime, rest periods, and leave.

4. **Provide a Safe Working Environment**

Business Partners must provide a safe, clean, and healthy working environment that utilizes reasonable measures to prevent occupational injuries and safety incidents. Business Partners must comply with all applicable health and safety laws and regulations. Business Partners must identify and assess workplace hazards and implement appropriate controls. Workers must receive adequate health and safety training and be provided with necessary personal protective equipment. Business Partners must have emergency preparedness and response procedures in place.

Environment

5. **Protect the Environment:** Business Partners must comply with all applicable environmental laws and regulations, and implement best practices and industry standards for environmental protection. Business Partners must take commercially reasonable steps to ensure that raw materials are sourced in a way that minimizes waste, deforestation, and other negative impacts on the environment and local communities.

6. **Adhere to Responsible Sourcing Standards**

Business Partners must comply with, and support Nouryon's compliance with, laws and regulations related to Conflict Minerals, Modern Slavery, and other responsible sourcing initiatives.

Business Partners must implement due diligence procedures consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Business Partners must not supply products containing conflict minerals that directly or indirectly finance armed conflict or contribute to human rights abuses. Business Partners must source commodities covered by the EU Deforestation

Regulation (including palm oil, soy, wood, cattle, cocoa, coffee, and rubber) from deforestation-free and legally compliant supply chains, with traceability to the point of origin as required by applicable law.

Business Partners will also follow best practices for the sourcing of at-risk raw materials such as palm oil and, where applicable, use alternatives to animal testing that are scientifically recognized and accepted by regulatory authorities.

Nouryon measures the sustainability and ethical sourcing performance of Business Partners through third-party assessments such as EcoVadis or Together for Sustainability (TfS) audits. Business Partners may be required to complete sustainability assessments and provide improvement plans to demonstrate progress in their sustainability and ethical sourcing practices.

7. Manage and Protect Information

Business Partners must take appropriate steps to protect Nouryon's proprietary or confidential information, including employee information, customer data, intellectual property, and trade secrets.

a) Data Privacy: Business Partners must comply with all applicable data protection and privacy laws, including the EU General Data Protection Regulation (GDPR) and California Consumer Privacy Act (CCPA), when processing personal data on behalf of or in connection with Nouryon. Business Partners must implement appropriate technical and organizational measures to protect personal data and must only process personal data for authorized purposes in accordance with Nouryon's instructions and applicable data protection agreements.

b) Cybersecurity: Business Partners must maintain an appropriate cybersecurity program with administrative, technical, and physical safeguards designed to protect the confidentiality, integrity, and availability of Nouryon information and systems. Such safeguards should be based on industry guidance, and appropriate to (i) the size, scope, and type of Business Partner's operations; (ii) the type of data that Business Partners access or process; and (iii) applicable laws and regulations. Business Partners must promptly notify Nouryon of any security incident or data breach that may reasonably affect Nouryon, its data, or its operations within 48 hours. Business Partners must cooperate fully with Nouryon's incident response efforts, including providing requested information, preserving evidence, and implementing remediation measures as directed by Nouryon.

c) Intellectual Property: Business Partners must respect and protect intellectual property rights, including patents, trademarks, copyrights, and trade secrets. Business Partners must not misappropriate or infringe upon the intellectual property of Nouryon or third parties. Business Partners must adhere to confidentiality restrictions related to any Nouryon Intellectual Property and must not disclose confidential information to any party other than those expressly authorized under applicable agreements. In the event of any unauthorized disclosure of Nouryon's confidential information or Intellectual Property, Business Partners must: (i) notify Nouryon promptly and in no event later than 48 hours after discovery; (ii) take immediate steps to prevent further disclosure and mitigate harm; (iii) cooperate fully with Nouryon's investigation and remediation efforts; and (iv) assist Nouryon in any enforcement actions against third parties, at Business Partner's expense where the disclosure resulted from Business Partner's breach.

8. Use Technology Responsibly

Business Partners must comply with all applicable export control laws and regulations, including the U.S. Export Administration Regulations (EAR) and EU export control rules, when accessing, using, transferring, or developing technology, software, technical data, AI systems, or related services for or on behalf of Nouryon.

Business Partners must use technology, including artificial intelligence (AI) and machine learning systems, responsibly and ethically. Specifically:

- a) Business Partners must not use Nouryon data, including confidential information, personal data, or customer data, to train, develop, or improve AI or machine learning models without Nouryon's express written consent.
- b) When using AI systems in connection with services provided to Nouryon, Business Partners must ensure appropriate human oversight, transparency, and accountability.
- c) When using AI systems in connection with goods or services provided to Nouryon, Business Partners must implement appropriate safeguards to prevent such AI systems from producing biased, discriminatory, or harmful outcomes.
- d) Business Partners must comply with all applicable laws and regulations governing AI and automated decision-making, including the EU AI Act.

9. Reporting Concerns

Business Partners must ensure that workers are aware of these ethical requirements. They will also provide employees and third parties with an anonymous channel to report potential violations of law, regulation, policy, or this Code. Business Partners will prohibit any retaliation against employees or third parties who raise good faith concerns. Business Partners must maintain effective grievance mechanisms that allow workers and other stakeholders to raise concerns without fear of retaliation. Business Partners must investigate reported concerns and take appropriate corrective action.

Any concerns about a business partner or Nouryon's adherence with this Code should be directed to our SpeakUp! reporting hotline. We offer toll-free telephone numbers in 36 countries and multiple languages. Please visit the [SpeakUp! website](#) for more information.

For questions about this Code, please contact:

Nouryon
Attn: Chief Compliance Officer
100 Matsonford Road
Building 1, Suite 500
Radnor, PA 19087
United States of America
Email: nouryoncompliance@nouryon.com

10. Implement Due Diligence and Compliance Systems

Business Partners must implement appropriate management systems and due diligence processes to ensure compliance with this Code and applicable laws. This includes:

- a) Establishing policies and procedures that address the requirements of this Code
- b) Communicating these requirements to relevant personnel and providing appropriate training
- c) Conducting risk assessments to identify and address compliance risks in their operations and supply chains

- d) Implementing these standards with their own suppliers and subcontractors
- e) Maintaining documentation to demonstrate compliance
- f) Establishing compliance management systems that facilitate adherence to applicable laws, regulations, and standards

11. Monitoring, Verification, and Consequences

Nouryon reserves the right to verify Business Partners' compliance with this Code through questionnaires, self-assessments, third-party sustainability assessments (including EcoVadis and Together for Sustainability audits), on-site audits, or other verification means. Business Partners must cooperate with such verification activities and provide requested information, documentation, and facility access.

Nouryon may require Business Partners to develop and implement corrective action plans to address identified deficiencies within specified timeframes. Business Partners must provide regular progress updates on corrective actions.

Failure to comply with this Code, to implement required corrective actions, or to cooperate with verification activities may result in consequences including suspension or termination of the business relationship.

Nouryon is committed to working with Business Partners to support continuous improvement and will provide reasonable support for remediation efforts. However, Nouryon reserves the right to immediately terminate relationships with Business Partners who demonstrate:

- a) Serious violations of this Code, including but not limited to forced labor, child labor, severe health and safety violations, significant environmental damage, or corruption
- b) Patterns of non-compliance or repeated violations
- c) Unwillingness to remediate identified issues or implement corrective actions
- d) Failure to cooperate with Nouryon's verification activities

Your partner
in essential solutions
for a sustainable future

Nouryon