

Nouryon

Code of Business Conduct & Ethics

We Do It Right



Effective June 2026



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Message from the Chairman & CEO



The personal integrity, shared values and ethical business conduct of every Nouryon employee form the basis of Nouryon's reputation around the world. When combined with our essential chemistry, those elements create an incredibly powerful platform for business success for the company and professional growth for all of us.

Our Board of Directors has approved Nouryon's Code of Business Conduct & Ethics (the Code) which anchors our compliance program and reflects our core operating principles. It is supplemented by our policies and procedures, which together with the Code, should guide your conduct in all settings. Our Code has the full support of Nouryon's senior management and must be adhered to by all Nouryon employees and contractors worldwide. Ultimately, Nouryon's most important asset is our integrity and outstanding reputation, and it is up to each of us to safeguard it. It is therefore essential that everyone at Nouryon understands and performs in accordance with our Code.

Thank you for always applying the high standards set out in our Code and upholding our reputation and integrity.

Sincerely,

A handwritten signature in black ink, appearing to read 'Charlie Shaver'.

Charlie Shaver

1. Our Values

"**We Do It Right**" is one of Nouryon's core values. In addition to complying with all applicable laws and Nouryon policies, our Code of Business Conduct & Ethics also requires us to think and act ethically. How we achieve results is just as important as the results themselves. [The Code covers everyone.](#)



We Aim High

Nouryon encourages a culture of ambition and high performance, setting high standards and striving to exceed them.



We Own It

Employees at Nouryon are encouraged to take ownership of their work, being accountable for their actions and decisions.



We Do It Right

This value emphasizes the importance of integrity and ethical conduct. It means doing the right thing, even when no one is watching.



The Code is not capable of covering every situation that Nouryon personnel may encounter but our bottom line is that, at all times, Nouryon expects you to conduct business in a manner that reflects favorably upon both the company and you.

When you're unsure of whether an action is ethical, ask yourself the following. If you're still unsure, discuss the situation with your manager or a member of the Legal or Compliance teams before proceeding.

When you're unsure of whether an action is ethical, ask yourself the following:

- Is this action legal?
- Does the action comply with the code?
- Would the action withstand public scrutiny if disclosed?
- Will the action reinforce Nouryon's reputation as an ethical company?

Yes to all

Move forward

Unsure

Get advice - speak to your manager
or contact Legal and Compliance

No to any

Stop, don't do it!

If you're still unsure, discuss the situation with your manager or a member of the Legal or Compliance teams before proceeding.

This Code covers key ethical principles and governs how Nouryon employees and contractors should generally conduct business. More specific day-to-day procedures are outlined in Nouryon's policies and procedures. Although this Code links to many of Nouryon's policies, to see all policies, visit the [Policy Portal](#).

The Company's senior management is tasked by the Board of Directors to ensure that this Code and the Company's corporate policies control the Company's activities. Everyone at Nouryon must understand the legal and ethical requirements that apply to their business and areas of responsibility.

No one is ever authorized to violate the Code. Anyone doing so is acting solely on their own behalf, contrary to Nouryon's best interests, and is subject to appropriate disciplinary action.

It Begins with Me

- Review and understand the Code
- Act ethically and use good judgment
- Understand the rules that apply to my work
- Reach out to internal resources with questions, advice, or concerns
- Embrace all initiatives and training that support the Code
- SpeakUp! if I suspect behavior that is unethical or violates the law, our Code, or our policies



I relentlessly pursue high standards and am accountable for all my actions.



Manager Responsibility

Additionally, if you are in a management position, you have a responsibility to:

- Ensure each person on your team has read and understands the Code
- Lead with integrity – model the good conduct you want to see in your team
- Foster an open-door culture where your team feels comfortable asking questions and raising concerns about conduct issues
- Reach out to internal resources if you need guidance
- Take action to prevent retaliation against any employee who makes a SpeakUp! report in good faith

Managers are expected to integrate the [Nouryon Leadership Capabilities Framework](#) into their team culture.

2. SpeakUp! and Reporting

If you see something, say something.

Complying with our Code and behaving in a way that reflects our commitment to ethical business practices are essential for maintaining a safe, respectful, and inclusive work environment.

Ask a question, Raise a concern, or Report a violation.

Nouryon is committed to upholding our Code at all times. This means that you must SpeakUp! and share any concerns about inappropriate, unethical or illegal conduct with the appropriate Company resource, including:

- Your manager
- Legal team
- Compliance team (nouryoncompliance@nouryon.com)
- HR team
- [SpeakUp!](#) reporting hotline

SpeakUp! is available in 30 languages. Reports can be made anonymously and confidentially as allowable under applicable law.

SpeakUp! Process

Q. What happens after I submit a SpeakUp! report?

A. Here is a general depiction of the process flow. To view more details of the process, see Nouryon's SpeakUp! Process Flow Chart



Training Commitments:

We commit to annually training 100% of our employees on the Code of Conduct including topics on harassment and discrimination, respectful workplace, cybersecurity, workplace safety, forced labor, child labor and SpeakUp! and non-retaliation. Mandatory training on other Code topics will be assigned based on employee's exposure to certain risk areas, such as conflict of interest, fraud, anti-competition, bribery and corruption, and international trade.

All Nouryon employees and contractors are responsible for:

- Reading and adhering to this Code and all policies; and
- Completing all mandatory trainings assigned to them in a timely manner

All assigned employees are required to read and electronically acknowledge the Code on an annual basis.

Consequences for Violating the Code:

Violation of any law or this Code is a serious matter. Any employee or Nouryon contractor who compromises or violates any applicable law, or the Code may be subject to disciplinary action, up to, and including, dismissal; loss of employment-related benefits; and, if applicable, criminal or civil proceedings.

Cooperating in Investigations:

You may be asked to cooperate or provide information during an investigation. Your full cooperation and assistance is required and the failure to do so will be considered a violation of the Code and Nouryon policy.

Waivers:

Waivers or exceptions to the Code for any employee will be granted only in advance and only under exceptional circumstances by the Executive Vice President & General Counsel.

Non-Retaliation and Confidentiality:

We will not tolerate retaliation against any employee who makes a good-faith report about a violation or possible violation of applicable law or the Code, or who participates in any investigation conducted internally or by a government enforcement agency. Any employee who believes he or she has been retaliated against should promptly report it to one of the resources listed below. Any submission of SpeakUp! reports in bad-faith (e.g., extortion, black-mail, or no legitimate basis for the report allegations) violates the Code and appropriate disciplinary actions will be taken, up to and including dismissal.

Investigating and Resolving Reported Violations:

- All reports of possible violations of the Code or applicable laws will be evaluated promptly and investigated as appropriate. For further information, see Nouryon's [SpeakUp! and Non-Retaliation Policy](#).



I understand my duty to share concerns about inappropriate, unethical, or illegal conduct.

3. We are Trustworthy

Anti-Bribery and Anti-Corruption

Trade Compliance

Antitrust & Fair Competition

Anti-Money Laundering

Third-Party Relationships



Obeying the law is the foundation of our Code of Business Conduct & Ethics. Nouryon operates in many different countries and jurisdictions, and employees are required to comply with the applicable laws in all countries to which they travel or any location where Nouryon does business. Although employees may not know the details of all laws, rules and regulations, it is important to know enough to determine when to seek advice from the Legal or Compliance teams.



Anti-Bribery and Anti-Corruption:

Nouryon is committed to complying with applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act and the anti-corruption laws of all other countries where we do business. It is never appropriate to offer, give, request or accept bribes, kickbacks or any other type of improper preferential benefit to or from anyone whether they are a government or party official, political candidate, business partner, or employee. In addition to cash, be aware that gifts, hospitality, political contributions or charitable donations may also constitute a bribe, kickback or other type of unlawful benefit. We are also committed to doing business only with business partners that share our commitment to compliance.

It Begins with Me:

- Never offer, pay, solicit, or accept bribes
- Always avoid situations that could give the appearance of bribery or corruption
- Be aware when dealing with government officials and regulators. Check with Legal and Compliance before offering things of value to government officials

For more information, see [Nouryon's Anti-Corruption Policy](#).



I will not offer or take any bribes, nor will I engage in corruption of any sort.

International Trade Laws:

We transfer products, supplies and raw materials to and from countries all over the world every day and we must comply with all laws, rules and regulations that govern these activities. These laws include export and trade controls and anti-boycott regulations that apply whether an employee is based in, or a citizen of, the Netherlands, the United States or another country. These and many other countries also impose and enforce sanctions against certain individuals, governments and companies worldwide, and the scope of these sanctions can vary widely. Nouryon is not permitted to do business in, or ship products or equipment to, certain jurisdictions, nor can we do business with sanctioned individuals or companies. Employees are required to help ensure that Nouryon complies with the applicable import-export and trade laws and to provide accurate and truthful information about our business to customs and other relevant authorities.

It Begins with Me:

- Employees involved in the export or import of products or technology, sale of controlled products or technology, or international payments should be aware of relevant laws, who our customers and suppliers are, the end-use and ultimate destination of our products, and how payments are made
- Report any actual or suspected breaches of trade laws to your manager, Legal, and Compliance

For more information, see [Nouryon's Sensitive Country Policy](#) for a current list of countries where transactions are banned or require pre-approval from Compliance.



Antitrust and Fair Competition:

We comply with all laws designed to protect and support competition. We should endeavor to deal fairly with Nouryon’s customers, suppliers, and competitors. We should not take unfair advantage of any business partner through manipulation, concealment, abuse of privileged information, misrepresentation of material factors or other unfair practices. Fair dealing laws and antitrust laws protect industry competition by generally prohibiting formal or informal agreements between competitors that seek to manipulate or fix prices or unfairly impact competitors.

It Begins with Me:

- When interacting with competitors, always refer to the [Competition Law Resources](#)
- Seek guidance from Legal and Compliance, whenever a competition or antitrust law question arises

For more information, see [Nouryon’s Competition Law Compliance Policy](#)

What is Competitive Information:

Using information about competitors can be a legitimate part of the commercial process. However, information about competitors should be accessed only from publicly available sources or benchmarking agencies. If anyone attempts to give you confidential commercial information about a competitor, politely decline and immediately report the incident to Legal or Compliance for assessment.



I will enhance our competitive advantage by complying with the spirit and letter of the law.

Do

- Discuss industry trends, standards, and best practices without touching on confidential information
- Share information that is already publicly available
- Keep detailed records of what was discussed during the meeting
- Inform your manager about any meetings with competitors
- Reach out to Legal or Compliance if unsure whether a topic is appropriate or to report any suspect discussions or proposals

Don’t

- Talk about current or future pricing strategies
- Discuss dividing territories, customers, or markets
- Share any non-public, confidential information
- Discuss terms of agreements or contracts with third parties
- Discuss bids or tenders that our Company or competitors are planning to submit
- Engage in conversations about strategies to exclude competitors from the market



Anti-Money Laundering:

You must comply with all applicable anti-money laundering and counter-terrorism financing laws and regulations. We may not attempt to conceal or “launder” illegally received funds or make the source of the funds appear legitimate. To avoid engaging in money laundering, employees must follow company payment procedures. In addition, employees should be alert for and immediately report any irregular or unusual methods of payments, refund requests, or other suspicious transactions to Legal or Compliance.

It Begins with Me:

- Watch out for irregularities in the way payments are made
- If you have concerns about a payment, request an alternative form be used and report the concern to your manager
- If the transactions seems suspicious, report it to Legal or Compliance, even if you do not move forward with the transaction

Third-Party Relationships:

Suppliers, both direct and indirect, are key stakeholders in the success of any business. We choose our supplier carefully and take appropriate measures to ensure they meet contractual requirements and follow the law, our Code, and our policies. Working with responsible suppliers is an important part of [Corporate Social Responsibility](#).

We expect all of our business partners to comply with all applicable laws and regulations, and to embody at all times the guiding ethical principles outlined in this Business Partner Code of Conduct. Any breach or violation can prompt Nouryon to reassess business relationships.

It Begins with Me:

- Ensure suppliers meet the requirements of our Business Partner Code of Conduct

For more information, see the [Business Partner Code of Conduct](#)

4. We are Accountable

Conflict of Interest
Gifts & Business Entertainment
Political Activities



Nouryon respects the right of our employees to manage their personal affairs. Nevertheless, we must avoid conduct that may create a potential or actual conflict of interest, meaning a situation where an employee's personal interests interfere (or appear to interfere) with the interests of Nouryon. All actual or perceived conflicts of interest must be disclosed immediately to our Executive Vice President & General Counsel, Chief Compliance Officer or, for potential conflicts involving personal relationships, your HR business partner.

Personal Relationships:

We expect you to think critically about your personal relationships within and outside of the Company, and to report and recuse yourself from any situation that you believe may create an actual or potential conflict of interest. For example, employees may not influence employment-related decisions that impact an immediate family member.

It Begins with Me:

- Disclose all potential conflicts of interest you may have
- If you have questions about the disclosure process, contact Compliance
- Do not act as a decision-maker where there is a conflict
- Report any situation that you believe may be a conflict of interest

For more information, see [Nouryon's Conflict of Interest Policy](#).

Outside Employment and Financial Interests:

It is almost always a conflict of interest for you to have outside employment with a competitor, customer, supplier or vendor. It may also be a conflict of interest for you or an immediate family member to have a financial interest in a company that competes with Nouryon or that transacts, or that seeks to transact, any business with Nouryon, unless the financial interest falls into one of the exceptions discussed in our [Conflict of Interest Policy](#).



I will avoid conflicts between my private interests and my job. If there is a potential conflict, I will disclose it.

Is it a conflict? Ask yourself:

- Could my personal interest or relationships influence the decisions I make?
- Could it appear to be a conflict of interest to someone else?
- Does it interfere with the work I do for Nouryon?
- Am I using Company resources, relationships, or my position for personal gain?
- Does it compete with Nouryon's interests?

If yes to any, it may be a conflict.
Contact [Compliance](#) for guidance.



Gifts & Business Entertainment:

Providing and receiving modest gifts or entertainment can be beneficial to long-term business collaboration, provided they are reasonable and appropriate for the situation, not offered to improperly influence a business decision and are permissible under laws and policies that apply to the recipient.

Consult with Legal or Compliance before giving or offering gifts or hospitality to a government official to ensure compliance with Nouryon's policies and applicable laws.

DO accept, if

- Modest in value, and in good taste
- Token items, like a pen, t-shirt, or logo-branded item
- Infrequent or occasional

DON'T accept, if

- Given in exchange for some action
- Cash, or cash equivalents, such as gift cards
- More than modest in value or lavish

For further guidance on gifts and entertainment, see [Nouryon's Global Meal, Gift & Business Entertainment Policy](#) and [the Anti-Corruption Policy](#).

Political Activities:

You should keep your political activities separate from your work for Nouryon. It is inappropriate to use Company resources (including time, property or equipment) for such activities. You should notify your manager before accepting a public office.

Any political activities being conducted on Nouryon's behalf must be approved in accordance with Nouryon's policies and procedures. Nouryon does not currently make political contributions and you may not make a political contribution on Nouryon's behalf.

If, in the future, Nouryon decides to make a political contribution, the contribution will need to be approved by the Executive Vice President & General Counsel and CEO.

It Begins with Me:

- Engage in political activities on your own time
- Use your own resources
- Avoid speaking on behalf of our Company without approval



5. We are Vigilant

Company Assets

Data Protection

Personal Data

Confidentiality

Use of Artificial Intelligence

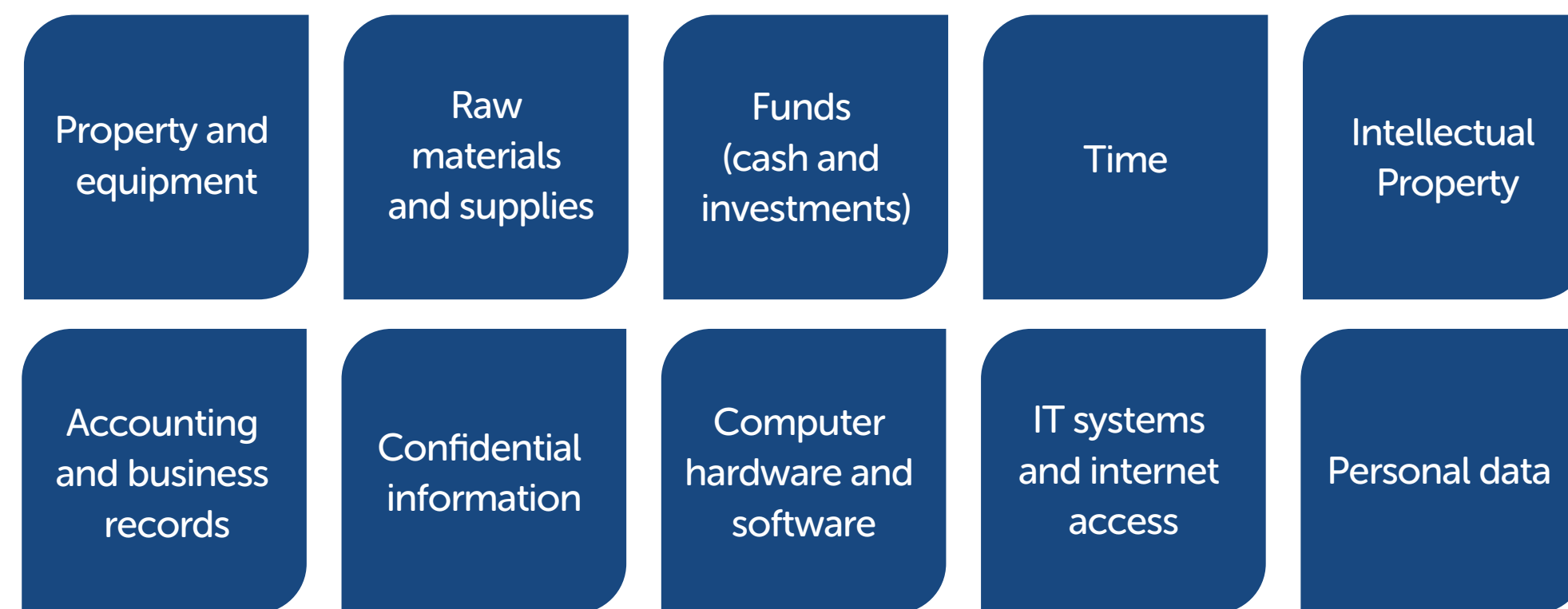
Accurate Books and Records



Company Assets:

Our assets are essential to our Company operations. We all have a duty to protect company assets and our data.

Some examples of company assets:



Permissible Technology Use: You must protect and exercise good judgment when using Nouryon’s technology resources. You may not use Nouryon’s email or intranet assets to send or access offensive or inappropriate content. Employees should protect Nouryon’s intellectual property and other company confidential information from improper disclosure to, or use by, a third party.

Document Retention: You must comply with Nouryon’s records management policies and legal hold notices. These policies apply to the retention and destruction of all records created by Nouryon, including hard copies, electronic files, emails, instant messages, videos and backup tapes.

Data Protection:

Keeping Nouryon’s data safe strengthens our business by building trust between our employees, customers and business partners. You must comply with Nouryon’s data security policies. Specifically, you must protect all passwords, user IDs, access cards and encryption or authentication keys. You must safeguard all confidential and non-public information, including, but not limited to, trade secrets, contracts, and manufacturing, personal and pricing data.

Cybersecurity: We are responsible for protecting the Company against cyberattacks, such as phishing. All security incidents must be immediately reported to the Compliance or Cybersecurity team. Attempts to access internal content or “hacking” into third party platforms to which you do not, or should not, have access is strictly prohibited.

Safeguarding Intellectual Property: Intellectual property (IP) is one of Nouryon’s most valuable assets and protecting our IP is a core responsibility for every employee. Each of us is responsible for safeguarding our trademarks, patents, copyrights, trade secrets, and proprietary know-how, methods and processes. It is critical that you never disclose to unauthorized individuals – whether inside or outside of Nouryon – any information that may compromise Nouryon’s proprietary technology or trade secrets. It is equally important that we respect the valid intellectual property rights of third parties. Unauthorized use of third-party intellectual property may expose Nouryon and our employees to civil damages and criminal penalties.

It Begins with Me:

- Safeguard all forms of Nouryon assets, including from theft, damage, and scams
- Keep secure any property that has been issued to you, such as access cards

For more information, see [Nouryon’s Acceptable Use of Systems and Devices](#)

Personal Data:

While working at Nouryon, you may create, discover, use, access, receive or otherwise handle the personal data of our employees, customers or business partners. You should follow applicable privacy laws and Nouryon’s internal guidance when collecting, using or sharing personal data.

Some examples of personal data:

First and last name	Email address	IP address	Home address	Telephone number
Financial information	ID number	Medical information	Nationality	Gender

For more information on, see [Nouryon’s Employee Privacy Policy](#)



I will safeguard Company property and will not engage in theft or misuse.

Confidentiality:

We should maintain the confidentiality of our own information and information entrusted to us by others. Confidential information includes all non-public information that might be of use to competitors, or harmful to the company or its customers if disclosed such as: marketing plans, sales data, financial performance data, personal data of employees or customers, strategies, intellectual property, and materials covered under legal privilege. You must follow all relevant laws and company policies when collecting, keeping and transferring confidential information. You are prohibited from using Nouryon confidential information for personal gain or to compete with Nouryon.

It Begins with Me:

- Only access the information you need to do your job
- Avoid discussing Nouryon information in public places
- Only share confidential information for authorized third parties who have legitimate business reason to know the information and confidentiality clauses in their agreement
- Protect our network from viruses and malware by only installing approved software
- Take special care to protect the personal data of your coworkers, customers, and business partners
- Keep secure any confidential information of customers or business partners, ensuring that it is secure
- Immediately report suspected theft or abuse of confidential information to Legal and Compliance

Accurate Books and Records:

Accurate Record Keeping: You have a duty to ensure that the records you keep are accurate, complete and up to date. The records and books of account of the company must accurately reflect the true nature of the transactions they record. Creating false or misleading records of any kind is prohibited.

Fraud and Misappropriation of Company Resources: You should follow all internal approval processes and accounting and financial reporting principles to properly record all transactions and to ensure they are subject to appropriate review. Do not knowingly create, use or accept any forged documents in connection with Nouryon business activities or request or accept the delivery of any Nouryon proceeds into personal bank accounts. You cannot facilitate or participate in any third-party attempts to defraud Nouryon and must take appropriate steps to protect against any misuse of company resources. You must report all suspected attempts of fraud to your regional or business controller, Compliance or Legal.

It Begins with Me:

- Ensure all business records are complete and accurate
- Never submit false or misleading information
- Report any actual, suspected, or attempted fraud
- Maintain our high standards

Responsible Use of Company Funds:

We are all responsible for safeguarding the Company's financial resources. This includes not using company funds for gifts or meals for, or in honor of, individual employees (e.g. birth, bereavement, holiday, wedding, retirement) unless it is a corporate initiative or pre-approved by our Executive Vice President & General Counsel. This does not prohibit you from using or collecting personal funds for individual gifts/events or the company from sponsoring meals/gifts for long-serving retirees.



Use of Artificial Intelligence:

Nouryon recognizes the potential of artificial intelligence (AI) technologies to enhance our business operations while also understanding the risks these tools can present. We are committed to using AI responsibly, ethically, and in compliance with applicable laws and our company values.

When using AI tools, including generative AI platforms, chatbots, and machine learning applications, you must exercise sound judgment and maintain appropriate human oversight. Employees are expected to participate in AI-related training as required and maintain awareness of AI risks and limitations. AI should augment—not replace—human decision-making, particularly for matters that may have significant business, legal, or ethical implications.

Protecting Confidential Information: You must not input Nouryon confidential information, trade secrets, proprietary data, personal data, or customer information into external AI tools unless the tool has been approved for business use and is covered by appropriate data protection agreements. Use only AI tools that have been approved by CISO, IM and Legal & Compliance. Approved tools have been evaluated to ensure that Nouryon data remains within controlled environments and is not used for third-party model training or disclosed outside the organization. If you are unsure whether a tool is approved, contact CISO, IM or Legal & Compliance before use.

Accuracy and Human Oversight: AI-generated content may contain errors, biases, or inaccuracies. You are responsible for reviewing and verifying all AI-generated outputs before using them in business decisions, communications, or deliverables.

External Disclosures: Follow any applicable legal or regulatory requirements regarding disclosure of AI-generated content, and consult Legal if you are unsure whether disclosure is required.

Bias and Fairness: Be aware that AI systems can reflect or amplify biases present in their training data. When using AI tools that inform business decisions, take steps to identify and mitigate potential bias.

It Begins with Me:

- Only use AI tools that have been approved for business use
- Never input confidential, proprietary, personal, or customer data into unapproved AI tools
- Always verify AI-generated content for accuracy before relying on it
- Complete required AI training and stay informed about AI-related policies
- Maintain human oversight and accountability for all AI-assisted decisions
- Report concerns about AI misuse or potential bias to Legal or Compliance

For more information on, see [Nouryon's Acceptable Use of AI Policy](#).



I will safeguard Company property and will not engage in theft or misuse.

6. We Care for Others

Anti-Harassment and Anti-Discrimination
Health and Safety
Social Media and Business Communication



Anti-Discrimination and Anti-Harassment:

The diversity of our workforce is a tremendous asset. We are committed to providing equal opportunity in all aspects of employment and will not tolerate discrimination on the basis of age, race, color, national origin, religion, sex, gender identity, sexual orientation or any other protected status. We will not tolerate discrimination or harassment of any kind, including derogatory comments based on race or ethnicity or unwelcome sexual advances.

Mutual Respect:

We set high standards for professional and ethical conduct that at all times govern how we interact with customers, suppliers, colleagues and members of the public. We treat people with courtesy, dignity and respect. This includes respecting Nouryon property and that of others, acting fairly and honestly at all times, working together to achieve better results, and taking steps to understand the laws/customs of the various countries where we operate. We have no tolerance for intimidation, hostility or threats.

Disciplinary Action and Counseling:

Nouryon maintains standards of performance and conduct in the workplace through the appropriate use of informal counseling, employee training, formal counseling and disciplinary actions, which may result in penalties, up to, and including, dismissal.

It Begins with Me:

- Treat everyone with dignity and respect
- Value diversity and the contributions of others
- Create a culture of respect
- Actively be inclusive in your work environment
- Be aware of any unconscious biases that might influence your judgment of people and situations

Health and Safety:

Health and safety is every employee's responsibility at all levels. Nouryon is committed to providing a safe working environment and protecting the environment, health and safety of our employees, customers and the communities in which we operate.

Workplace Health and Safety:

Employees are entitled to a safe, clean and healthy working environment that complies with all relevant laws, rules, regulations and policies, as well as Nouryon's [Life-Saving Rules](#). All Nouryon employees must perform work in accordance with safe standards and practices. All business activities must be conducted with all necessary permits, approvals and controls. If conditions or behaviors are unsafe you must immediately stop work/inform your supervisor.

Product Safety:

You must label products properly and communicate product-handling requirements in accordance with applicable laws and the Company's policies.

It Begins with Me:

- Work in a safe manner at all times
- If you see something unsafe, stop and do something about it
- Follow all local policies on drugs and alcohol in the workplace
- Comply with local safety requirement
- Live by the [Life Saving Rules](#)

For more information, see [Nouryon's QHSE&S Policy](#)

Our dedicated safety program, [Nouryon Cares](#), focuses on health, safety, and community outreach.

Social Media and Business Communication:

Unless specifically authorized, you should refrain from speaking publicly on Nouryon's behalf or publicly disclosing proprietary or confidential information about Nouryon. Only employees who have been given permission to speak publicly on Nouryon's behalf are permitted to do so. Those individuals permitted to speak on Nouryon's behalf must always be truthful, accurate and respectful in their communications.

You also must carefully consider your business communications, regardless of the method you use to communicate, and ensure that they meet high standards. Do not hold out or present your own personal opinions as those of the Company. Use discretion and common sense when using social media and follow the Company's guidelines at all times.

It Begins with Me:

- Be careful about what you publish – if you would not communicate it at work, then don't communicate it online
- Do not use social media to:
 - Share confidential information
 - Violate the Code
 - Engage in harassment, discrimination, or retaliation.
 - Violate any other laws or ethical standards

For more information, see [Nouryon's Social Media Policy](#)



7. We are Responsible

Environmental Stewardship
Human Rights and Labor Practices



Environmental Stewardship:

We are committed to environmental stewardship and protecting environmental resources for future generations. To that end, you must comply with all environmental laws, rules and regulations established by local, regional or national authorities including those governing the use, storage and disposal of hazardous materials.

You must report to Legal all instances in which hazardous materials or waste are improperly handled, transported or disposed.

Commitment to a Sustainable Future:

We partner with our customers, suppliers and employees to deliver innovative solutions, drive progress and create a safe and sustainable today and tomorrow for everyone. Our sustainability goals are aligned with the objectives of the UN Paris agreement on climate change and the UN sustainable Development Goals.

We are committed to:

- Continuously Improve our safety and environmental performance
- Grow and Innovate to create sustainable solutions enabling customers to be more sustainable
- Engage and Partner with employees, customers, suppliers, and society to drive sustainable progress

For more information, see [Nouryon's Sustainable Development Goals](#)



I will think about the environment I would like to live and work in, and play my part to protect it.



Human Rights and Labor Practices:

Nouryon, and any third party working with Nouryon, must comply with all labor laws in the jurisdictions where it operates. We will not engage in, or do business with any third party engaging in, the use of forced or involuntary labor, human trafficking or child labor. We recognize the human rights of all people as outlined in the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

Freedom of Association: We recognize and respect all applicable labor and employment laws including those addressing freedom of association, privacy and equal employment opportunity wherever we operate.

Living Wage Commitment: We commit to paying all of our employees a living wage by 2030.

It Begins with Me:

- Do your part to ensure that human rights abuses, such as use of compulsory, forced, or child labor, are not occurring within our business or supply chains
- Ensure we deal responsibly with our suppliers and customers

For more information, see [Nouryon's Position Statements](#)

8. Resources

Policies from the Policy Portal

Contact: nouryoncompliance@nouryon.com

Acceptable Use of Systems & Devices Policy	Anti-Bribery & Anti-Corruption Policy	Competition Law Compliance Policy	Conflict of Interest Policy	Employee Privacy Policy
Global Meal, Gift & Business Entertainment Policy	QHSE&S Policy	Sensitive Country Policy	Social Media Policy	SpeakUp! and Non-Retaliation Policy

Other Resources

Business Partner Code of Conduct	Position Statements	Life-Saving Rules	Nouryon Cares	SpeakUp! Process Flow
SpeakUp! Reporting Hotline	Sustainable Development Goals			

 I will familiarize myself with the policies and other resources available.