

# J.M. Huber Corporation Code of Ethics

J.M. Huber Corporation's ("Huber") reputation and business performance depend on the integrity of our employees' individual actions and decisions. The trust our customers, shareholders and communities place in Huber is an invaluable asset.

The Code of Ethics clarifies and emphasizes the requirements and expectations we have for Huber employees around the world in their day-to-day work. It applies to all employees of Huber and our affiliated companies. Huber chooses to work with ethical business partners and encourages them to act in line with this Code.

## SAFETY & SUSTAINABILITY

### Beyond Compliance

Huber operates our facilities in full compliance with all local, state and national laws and regulations. Huber shall obtain, keep current and follow the reporting guidelines of all the required environmental permits and registrations to be legally compliant at any time. Huber's commitment to environmental stewardship and reducing our impact on the planet goes beyond compliance expectations or requirements.

### Health and Safety

Huber provides a healthy and safe working environment for our employees. Risks are continuously evaluated such that protective measures can be taken to ensure a safe and healthy working environment. Huber maintains a productive workplace by minimizing exposures to accidents, injuries and health risks to our employees, visitors and contractors. Huber provides potable drinking water, lighting, appropriate temperature controls, ventilation, sanitation and personal protective equipment together with well-equipped workstations. In addition, facilities are constructed and maintained in accordance with the standards set by applicable laws and regulations.

### Emergency Planning

Huber has safety protocols in place at each of our locations including emergency exits, first aid supplies, fire detection and suppression equipment, and provides comprehensive training for our employees.

### Resource Optimization

Huber seeks to acquire and use materials for production in a responsible manner that does not negatively impact the well-being of humans, animals, ecosystems, biodiversity and other living systems. Huber meters, monitors and reports water and energy usage. Huber has established multi-year facility and organizational efficiency targets that are reported publicly on an annual basis. Huber incorporates sustainable design—including elimination, reduction and recycling of finite natural resources—into our processes and product development.

### Biodiversity

Huber is committed to the protection of the world's biodiversity and combatting the loss of nature throughout our value chain. As Huber depends on biodiversity for our bio-based raw materials and for innovation, we will understand our biodiversity impacts and support the adoption of biodiversity conservation actions through the full lifecycle of our products.



## **Renewable Energy**

Huber is committed to reducing our dependency on finite natural resources and reducing our impact on the environment by increasing the percentage of energy utilization from renewable resources. Huber will maintain a renewable energy utilization target and commits to reporting publicly on an annual basis.

## **Waste Minimization**

Huber seeks to minimize waste from our operations through engineering, elimination, reduction, reuse and recycling. Huber will maintain and report performance related to air and carbon emissions, water emissions and material waste from our manufacturing operations.

## **Management of Hazardous Materials**

Huber seeks to identify and manage chemical and other materials posing a hazard if released to the environment and ensure safe handling, movement, storage, recycling or reuse, and disposal of such materials.

# **ETHICAL BEHAVIOR**

## **Anti-Corruption**

Huber does not tolerate any form of corruption, extortion or embezzlement. Huber employees must never—directly or through intermediaries—offer or promise any personal or improper advantage to obtain or retain a business or other advantage from a third party, whether public or private.

## **Anti-Bribery**

Huber employees will not pay or accept bribes, arrange or accept kickbacks, and shall not take any actions to violate, or cause our business partners to violate, any applicable anti-bribery laws and regulations, including but not limited to the US Foreign Corrupt Practices Act and the UK Bribery Act.

## **Fraud Awareness**

Employees should be alert to external or internal fraud exposure, and must immediately report unusual or suspicious business, financial or cyber activities resulting from a coworker, customer, vendor, contractor, banking intermediaries or other third party. Employees are responsible for completing any required compliance training and staying up to date on internal control policies pertaining to fraud. A failure to record a transaction or payment accurately, or to mislead, conceal, alter or otherwise manipulate records, may constitute fraud and result in legal or reputational implications for employees and Huber.

## **Competition**

Employees may find it necessary to meet with their counterparts at competing companies. During these meetings, they must manage contact with competitors with care and such contact must always be organized in a way that ensures compliance with competition regulations. Employees will not engage in fraudulent behavior by intentionally deceiving someone to gain unfair or illegal advantage.

## **Conflicts of Interest**

When an employee is in a situation in which competing loyalties could cause them to pursue a personal benefit for themselves, their friends or family at the expense of Huber, they may be faced with a conflict of interest. Huber's employees must identify, declare or avoid situations in which their own interests or those of relatives or friends may risk conflicting with what is best for Huber.



## **Gifts & Business Courtesies**

Huber is committed to competing solely on the merit of our products and services. Employees should avoid any actions that create a perception that favorable treatment of outside entities by Huber was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from or for persons or companies with whom Huber does or may do business. Huber will neither give nor accept business courtesies that constitute—or could reasonably be perceived as constituting—unfair business inducements that would violate law, regulation or policies of Huber or our customers, or would cause embarrassment or reflect negatively on Huber’s reputation.

## **Intellectual Assets**

Huber’s intellectual property rights (our trademarks, logos, copyrights, trade secrets, “know-how” and patents) are among our most valuable assets. Unauthorized use can lead to a serious or complete loss of value. Employees must respect all copyright and other intellectual property laws, laws governing the fair use of copyrights, trademarks and other intellectual property. Current and former employees as well as third parties are required to report any actual or potential violations of trademarks, logos or other intellectual property to Huber’s Legal department.

Likewise, employees should respect the intellectual property rights of others. Inappropriate use of others’ intellectual property may expose Huber and the employee to criminal and civil fines and penalties. Employees must have proper approval and agreements for preserving confidentiality from Huber’s Legal department before soliciting, accepting or using non-public proprietary information from individuals outside the Company, or letting them use or have access to Huber proprietary information.

## **Huber’s Property**

Huber’s property must only be used for Huber’s business. It may not be used for competing purposes or in any other inappropriate manner that risks damaging Huber. Huber’s property may not be used for the personal gain of an employee, or that of their relatives or friends. Equipment that Huber provides to employees remains Huber’s property and must be looked after accordingly.

## **Confidentiality**

Huber’s communication must be open, correct, transparent and easily accessible, as well as comply with legal requirements and commercial confidentiality. Non-public information on Huber’s financial condition, operations, customers or suppliers must be protected by Huber employees from unauthorized use and dissemination in compliance with the Company Information Protection policy. Huber employees must protect such information from unauthorized use and dissemination in compliance with Company confidentiality policies.

## **Reporting of Suspected Unethical or Illegal Behavior**

We encourage our employees to report promptly, in good faith and in accordance with this Code, any reasonably suspected violation of any of the following: this Code; any accounting, internal accounting controls or auditing matters; any mail, bank or wire fraud; any fiduciary duty arising under federal or state law; or any other law, regulation or rule. Acts of retaliation due to reports are violations of the Code and are not tolerated.



## **EXCELLENCE**

### **Product Responsibility**

Huber's success depends upon the quality and safety of our products supplied to our valued customers all over the world. Huber will manufacture and supply the highest quality of products, ingredients and solutions to our customers, and do so in compliance with all applicable product specifications, regulatory and product safety standards.

### **Sustainable Capital Investment**

Huber's Sustainability Strategy centers on a Triple Bottom Line approach that balances People, Planet & Profit considerations when making business decisions. As such, capital investment is preferentially deployed to projects with Triple Bottom Line benefits. Objectives related to sustainable capital deployment are established and reported annually.

### **Sustainable Supply Chain**

Huber partners with socially and environmentally responsible suppliers. Huber requires that suppliers of goods and services take ethical, human rights, labor, energy and environmental aspects into account in their business activities.

### **Land Rights**

Huber will never operate on land on which we do not have the legal right to operate. Huber respects the communities we operate in and the rights of individual landowners and indigenous people. Huber works with communities in harmony and without violating the land rights where we operate.

## **RESPECT FOR PEOPLE**

### **Human Rights**

Huber supports and respects protection of internationally recognized human rights. Huber will ensure that all employees are treated humanely, with dignity, and will never suffer physical or mental punishment or any other form of abuse.

### **Child Labor**

Huber does not use, support or benefit from child labor. Huber adheres to minimum age provisions of applicable laws and regulations.

### **Forced Labor**

Huber does not use, support or benefit from any form of forced labor. Huber prohibits physical abuse of employees and prohibits the use of all forms of forced labor including prison labor, indentured labor, bonded labor, military labor, and all forms of slave labor and modern-day slavery.

### **Human Trafficking**

Huber denounces any act involved in the recruitment, abduction, transport, harboring, transfer, sale or receipt of persons within national or across international borders, through force, coercion, fraud or deception. Huber expects all employees to be vigilant and report any discovery of slavery or human trafficking to Huber's Legal department.



## **Freedom of Association**

Huber respects employees' right to join, form or not to join a labor union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, Huber strives to establish a constructive dialogue with their freely chosen representatives and bargain in good faith with such representatives.

## **Political Activity**

Huber recognizes the personal right of our employees to participate in political activity. Huber employees may publicly support or oppose any political party, candidate or cause that they choose in a personal capacity, provided such an employee does not represent their support or opposition as that of Huber or use any Huber materials or property in the process.

## **Diversity, Equity & Inclusion (DE&I)**

Huber will set the standard for a culture that respects the dignity of all people, inspires belonging and promotes equitable access to opportunity. Our commitment contributes to a high-performing, innovative and prosperous Company, positively impacts our communities globally, strengthens Huber's legacy for future generations, and creates a welcoming and inclusive work environment for all employees.

Huber's employees must have fair and equal career and development opportunities irrespective of their gender, gender identity/expression, ethnicity, religion, age, disability, sexual orientation, nationality, political opinion, union membership, social background, veteran status, health status or family responsibilities. The basis for recruitment, hiring, placement, training, compensation and advancement should be qualifications, performance, skills and experience.

## **Anti-Harassment & Non-Discrimination**

Huber treats all employees with dignity, respect and integrity. There must be no incidence of discrimination, harassment, abuse or threats in the work environment. Huber will never discriminate against employees based on gender, gender identity/expression, ethnicity, religion, age, disability, sexual orientation, nationality, political opinion, union membership, social background, veteran status, health status or family responsibilities. Any exclusions or preferences in the work environment made on these bases, which results in impaired equality, are prohibited. Huber will hire employees and contract labor based only on each person's job-related competencies. Huber shall provide fair treatment to all employees and create a work environment free from mental or physical coercion. Any act creating an intimidating, hostile or offensive work environment is strictly prohibited.

## **Working Hours and Wages**

Huber's employees are provided with competitive wages and benefits that comply with local and national laws, as well as binding collective agreements, including those pertaining to overtime work and other premium pay arrangements. Huber offers employees opportunities to develop their skills and capabilities and provides advancement opportunities where possible. Huber complies with all applicable laws and mandatory industry standards including but not limited to regular working hours and overtime hours, with breaks, rest periods, holidays, sick leave and medical leave, as well as parental leave. To the extent any employee has an employment contract, Huber complies fully with the terms of said agreements.

## **Fair Recruitment**

Huber will not charge, directly or indirectly, in whole or in part, for any fees or costs to jobseekers and workers, for the services directly related to temporary assignment or permanent placement. Recruitment and placement practices will be based on merit and free of discrimination in any form. Terms of



engagement, including nature of work, working conditions, rates of pay and pay arrangements and working hours, will be made transparent and in an understandable language. Workers' assent will be obtained without coercion.

### **Data Protection and Privacy of Personal Data**

Huber respects employees' privacy and handles personal data in confidence and in line with applicable laws and regulations. Huber shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted and shared. Huber maintains an established information security system to protect our data and information, and the information of our customers and employees, from being disclosed, changed, destroyed or used for any illegitimate purpose.

### **Employment Practices**

Huber shall only employ workers who are legally authorized to work in their facilities. Huber is responsible for validating employees' eligibility to work through appropriate documentation. All work is voluntary, and workers shall be free to leave work or terminate their employment at any time. Huber will not hold or deny access to employee identification documentation, such as government-issued identification, passports or work permits, unless required by law.

### **Substance Abuse**

Huber protects the health, well-being and safety of our employees, contractors, visitors and the public. As such, Huber administers substance abuse tests in accordance with our drug and alcohol policy and in compliance with the laws of the jurisdictions we operate within. Furthermore, Huber provides all current employees with a confidential voluntary disclosure program to provide an opportunity for counseling and rehabilitation where appropriate and within the guidelines of the policy.

### **Employee Development & Training**

At Huber, we have the utmost responsibility to protect and nurture our human capital to ensure that people have the right skills and are empowered to perform at their best. We invest in learning platforms that allow employees to easily access training and development. We implemented organization-wide talent reviews and succession planning to facilitate visibility of talent to the top leaders across the enterprise. We have a CEO-sponsored leadership development program that brings together the future generation of leaders globally. Each portfolio business also provides leadership development programs that target their needs.

Broadly speaking, development also comes in the form of on-the-job training, which employees receive starting with the onboarding process and throughout their careers with Huber. Our Employee Resource Groups (ERGs) facilitate employees developing team leadership skills through voluntary leadership opportunities and sponsoring workshops on various career topics.

### **Local Communities**

Corporate philanthropy and community engagement play an important role in helping Huber demonstrate what it means to be a good corporate citizen. Across our organization, we are committed to giving back to the communities in which we operate through charitable donations, supporting local initiatives, and demonstrating our commitment to Huber employees and to the communities in which they live and where they work. Company contributions align with our Principles while enhancing Huber's good standing through local, national and international efforts in the areas of Affordable Housing, Education & Wellness and the Environment, as well as natural disaster relief and recovery.



## GENERAL

Huber employees must comply with all applicable legislation. If the provisions of the Code of Ethics are found to be incompatible with legislation, then applicable laws and regulations take precedence.

The Code of Ethics is a broad but not exhaustive document. Huber policies provide further guidance and specificity. Every employee is personally responsible for understanding and acting in accordance with this Code and Huber policies. The Code of Ethics is available on Huber intranet and website. All supervisors are responsible for ensuring that their employees are familiar with the Code.

Huber expects that an employee or other stakeholder who suspects a breach of the Code of Ethics will report this concern to Huber's Legal department. Employees are also encouraged to seek guidance on ethical dilemmas and communicate concerns to their supervisor or another manager, their Human Resources representative, or a compliance, auditing or legal resource at Huber. There is also the option for employees to use Huber Ethics Line program as well the annual Ethics Questionnaire. Huber will not tolerate any form of reprisals against any reports made in good faith.

