



Arkem Chemicals B.V.

Code of Ethical Conduct



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1. INTRODUCTION

The foundation of our culture can be summed up in the words *trust*, *honesty* and *integrity*.

All our stakeholders, including employees, customers, suppliers and business partners, can expect us to maintain high ethical standards. It is our responsibility to uphold these standards of conduct at all times. We are convinced that trust, honesty and integrity guarantee the reputation of Arkem Chemicals B.V. and strengthen our image.

Most people have a sense of what is right and wrong in everyday life, but in today's complex business world this distinction is not always easy to make. The Code of Conduct provides guidance on how to conduct business and deal with people.

It goes without saying that we expect you to do this if you suspect or notice that there is something wrong with you or the code of conduct, you report this to your direct manager, a Management Team member or the Senior Management.

The Code of Ethical Conduct reflects the DO'S and DON'Ts in the daily actions of Arkem Chemicals B.V. and its employees. The best guarantee of compliance is the continuous education of everyone involved in Arkem Chemicals B.V., which works to ensure that Arkem Chemicals B.V. itself stands out in its commitment to maintaining the highest possible ethical standards.

If employees raise questions about a particular business issue or business practice, or if they honestly and with good reason report their suspicions that the Code of Conduct is being violated or not being followed in this spirit, this will under no circumstances lead to negative treatment of the employee concerned or adversely affect the employee's career.

As a guide to making ethical decisions, employees should ask themselves the following questions when faced with problematic issues:

- Is it legal?
- Am I violating the policies, rules or guidelines of Arkem Chemicals B.V.?
- Is my action 'the right thing to do'?
- Is my action fair to all those affected by it, both in the short and long term?
- How do I feel when I carry out this action?
- I would feel good if my family, colleagues and friends knew about my action.
- I would feel proud if my action was publicised.
- Will my action damage the reputation of Arkem Chemicals B.V.?

This is a simple tool for everyone. These questions are not random, but cumulative, and if you answer them one by one, it is easier to make ethical decisions. These questions apply to the whole company and all its parts, and provide employees with a simple guide when dealing with the 'grey areas' and making daily decisions.

- » As Arkem Chemicals B.V., our values are;
- » To lead the sector with our business conduct, innovation and adopted values,
- » To comply with ethical rules of conduct,
- » To be a company that is beneficial to its society and country,
- » To consistently meet customers' expectations at the highest level,

- » Creating mutual benefits in relationships with stakeholders while respecting the law and ethical values,
- » To continuously develop human resources and to achieve better results every day with the power derived from developing human resources,
- » Being environmentally sensitive within the understanding of sustainability,
- » To adopt sensitivity towards humans and nature as a primary principle in our activities.

The Code of Ethical Conduct serves as a guide for all our internal and external stakeholders in all activities in which Arkem Chemicals B.V. is involved and represented. The Code of Ethical Conduct is drawn up by Arkem's management and is periodically reviewed at least once a year and, in the event of changes, updated immediately and published and communicated to all stakeholders.

The quantitative targets determined by Arkem Chemicals B.V. within the scope of the Code of Ethical Conduct are defined in detail in the Strategic Sustainability Goals document (MNG-SG), which is an integral part of this document.

For detailed notifications and feedback, you can contact us via ethics@arkem.com.

2. PURPOSE AND SCOPE

This document defines the ethical principles and rules of conduct that Arkem Chemicals B.V. is committed to adhering to in all its activities. The Code of Ethical Conduct is based on core values such as honesty, justice, respect, transparency, and social responsibility. It is designed to guide our employees, managers, business partners, and stakeholders in all their business processes.

3. RESPONSIBILITIES

All employees, managers, and business partners within Arkem Chemicals B.V. are responsible for implementing the Code of Ethical Conduct. These rules apply not only to internal stakeholders (employees, managers, affiliates, etc.) but also to external stakeholders (suppliers, customers, consultants, contractors, and business partners).

Acting in accordance with the principles of ethical conduct is a fundamental obligation of every stakeholder. All stakeholders are expected to understand and embrace these rules.

Arkem Chemicals B.V.'s Management Board is authorized to oversee the effective implementation of these rules throughout the organization and to provide guidance when necessary. It is essential that any detected or suspected violations of ethical principles be reported confidentially to Arkem Chemicals B.V.'s Management Board.

To ensure the effective implementation of ethical rules and their integration into the company culture, the responsibilities of all stakeholders are clearly defined:

Responsibilities of Employees

All employees are obligated to act in accordance with Arkem Chemicals B.V.'s ethical principles. Should they encounter or suspect an unethical situation, they must immediately report it to the relevant departments using appropriate reporting channels. Employees also undertake to adhere to the standards of conduct outlined in this policy.

Responsibilities of Managers

Managers ensure the establishment of an ethical culture and serve as role models for employees. They convey the importance of this policy to their teams and avoid encouraging or condoning unethical behavior. It is also the responsibility of managers to ensure the protection of employees who report violations.

Responsibilities of External Stakeholders

Suppliers, customers, and all third-party collaborators agree to act in accordance with Arkem Chemicals B.V.'s ethical principles. In this context, external stakeholders are also expected to act in accordance with the Code of Ethical Conduct.

4. REVIEW

The Code of Ethical Conduct, prepared by the Management Board, is reviewed periodically, at least annually. Any revisions deemed necessary are submitted to the Board of Directors for approval and immediately implemented. Once implemented, it is published on the website, making it accessible to all stakeholders.

5. DISTRIBUTION AND APPROVAL PROCESS

All employees are presented with the Code of Ethical Conduct as part of their onboarding program and are informed about the principles outlined in the document. Additionally, employees are provided with periodic Business Ethics training to raise their awareness of the implementation of these principles.

Employees are required to sign the Code of Ethical Conduct upon employment. The approved Code of Ethical Conduct is kept in employee personnel files.

All our stakeholders are expected to act in accordance with our Code of Ethical Conduct, which is published on our website. In contracts with business partners, the Code of Ethical Conduct is included as an annex, and signing the document is required before starting work. We will not purchase products or services from business partners who have not signed the Code of Ethical Conduct.

6. FIGHTING AGAINST CORRUPTION

6.1. Bribery

A bribe is not only cash that is secretly exchanged in an envelope. It is also an offence to offer a bribe even if it is not paid. Bribery is not only cash, facilitating payments, gifts, travelling and accommodation, political donations, fraudulent tenders are also included in the scope of bribery.

As Arkem Chemicals B.V., we adopt anti-bribery as an important principle and we obligate our employees to act in accordance with anti-bribery rules at all stages of our activities and we expect all our stakeholders to act in accordance with these rules.

6.2. Fraud, Money Laundering

Arkem Chemicals B.V. is not permitted to directly or indirectly, through its commercial activities, engage in or facilitate corruption, irregularities, fraud, money laundering or embezzlement within the framework of national and/or international legislation.

Our employees and company management adopt the fight against fraud and money laundering as an important principle and act in accordance with these rules in all steps of their activities and expect all our stakeholders to act in accordance with these rules.


Financial irregularities, fraud and attempted fraud will not be tolerated and will always be reported to the police. If an employee has a suspicion in this area, it is expected that the employee or a colleague of the employee will report this immediately to the direct manager, a member of the Management Team or the Confidential Counsellor.

6.3. Gifts & Hospitality

Our employees cannot request gifts (except gifts of symbolic value) or any benefit from any person or institution. An employee who is offered a benefit without his request should not accept it if he thinks that the benefit in question may affect his impartiality and judgment or lead to a conflict of interest during the decision-making process. Arkem Chemicals B.V. employees must act in accordance with these rules regarding the gifts or treats they offer to customers, suppliers and third parties, and must take care to ensure that the gift and/or treat in question does not create an obligation to reciprocate on the recipient.

As long as it is within company policy, entertainment may be provided without prior approval if the person is entitled to it. However, meals with public officials require special consideration. If there is any doubt or concern about the appropriateness of a meal with a public official, the employee should consult his or her direct manager.

In events and/or organizations sponsored by Arkem Chemicals B.V., actions are taken within the limits of company policy.

Arkem Chemicals B.V. is allowed to cover some travel and accommodation expenses for company visitors if it is compatible with the company objectives, the seniority of the guests and the company's activities. It is mandatory to comply with these conditions even if the travel and accommodation expenses of third parties such as business partners, vendors, consultants, external experts are covered by them on behalf of Arkem Chemicals B.V.. Employees must use the Expense Declaration Form in  (Nmbrs) for any gifts, travel and entertainment to be provided to third parties.

6.4. Money and Individual Travel

The employee is not permitted to work without prior written permission from Arkem Chemicals B.V.

- Money, a loan, goods or services free of charge or at non-market rates to accept
- Accepting individual trips without a business objective (such as airline tickets, train tickets, passage tickets for travel by ship, rental cars and accommodation in a hotel, apartment or holiday home)

6.5. Business gifts

The acceptance of business gifts offered on the occasion of New Year's Eve, for example, must be limited to small amounts that do not exceed the commercial value of € 100 to go. The employee is not permitted to work without prior written permission from the employee managing director of Arkem Chemicals B.V., offered to accept business gifts that this exceeds the amount.



6.6. Invitations

Any offer to attend a seminar, company visit, trip or other meetings in or outside the Netherlands on behalf of a business relationship (or possible future relationship) can only be accepted after written permission has been obtained from his manager. The travel and, in principle, accommodation costs will be borne by Arkem Chemicals B.V., unless this is due to the specific circumstances of the business aspects of the situation that can be considered responsible for accepting an offer for this acceptance. The decision will be made by the manager responsible. The employee may not be accompanied by his partner. Only if the participation of the partner is generally customary will the partner be allowed to participate be allowed to attend.

7. CONFLICT OF INTEREST

As Arkem Chemicals B.V., we actively follow all legislation related to our product range in terms of the sector and activity areas we operate in, and we maintain our relationships with customers, suppliers and other business partners in a transparent, professional, prudent and dynamic manner. We avoid all situations that could create or give the impression of a conflict of interest in all domestic or international operations and the company's internal functioning, and we also expect all our stakeholders with whom we cooperate to implement these principles and standards.

8. ANTI-COMPETITIVE PRACTICES

Arkem Chemicals B.V. closely follows and complies with the legislation of all relevant countries with which we have intensive contact as a result of our foreign business activities. In this way, we ensure that our business activities at home and abroad are carried out effectively and sustainably. We value fair competition and avoid activities and transactions that prevent competition or disrupt the market, knowing that we are strengthened by the existence of our competitors. Our employees will oppose and, where necessary, take action against any practices that would impede the functioning of competitive market institutions and rules, both in their own business and in the business areas in which they receive and/or provide services. We expect all our other stakeholders to act in accordance with the rules of competition.

Compliance with national and international regulations and good practices is ensured to prevent abuse of dominant position in cases of commercial mergers and acquisitions. It is essential not to be a party to mergers or acquisitions that, individually or jointly, create a dominant position or further strengthen the dominant position, resulting in a significant reduction of competition in the whole or in a part of the country.

9. DIVERSITY, EQUITY & INCLUSION



As Arkem Chemicals B.V., we offer equal opportunities to all our employees, act fairly, and see diversity as a value and an integral part of the corporate culture. In this regard, we strive to ensure equality, diversity and inclusion in our activities and take the necessary measures to protect them.

As Arkem Chemicals B.V., we do not accept any kind of discriminatory behaviour against any individual on the basis of race, colour, language, gender, sexual orientation, marital status, age, religion, philosophical or political opinion, physical qualifications and similar visible or invisible reasons, and we do not tolerate discriminatory attitudes, behaviours and practices under any circumstances and conditions. In all of our relationships with our stakeholders, we place a high value on working with organisations that value diversity, equality and inclusion.

10. DISCRIMINATION AND HARASSMENT

As Arkem Chemicals B.V., we offer our employees a healthy, peaceful, labour peaceful and safe working environment free from all kinds of violence, harassment, pressure, bullying, mobbing, threats and micro-aggressions. Persons who damage this environment, commit any kind of violence and harassment will not be tolerated under any circumstances, and we ensure that the necessary disciplinary and/or legal procedures are carried out against them.

11. CHILD LABOR, FORCED LABOR, SLAVERY AND HUMAN TRAFFICKING

As Arkem Chemicals B.V., we comply with local laws on child labour, forced labour, slavery and human trafficking in all countries where we do business, represent and/or manage operations, as well as the United Nations International Labour Organization (ILO) standards and international standards in these areas. We are committed to acting in accordance with these conventions. We value the attention of our stakeholders to this issue and will not tolerate any of our stakeholders working in contravention of the required regulations.

12. SOCIAL COMMUNICATION

12.1. Communication with Employees

Open, honest, fair and two-way communications are established with all our employees. Our employees express their opinions and suggestions openly, and applicable situations are adapted to the processes. Our employees can submit their complaints/suggestions and feedback via the suggestion box, by stating their names or anonymously. Feedback is evaluated by the Office Manager. The evaluation result is shared with the employee if he/she indicates the name of the employee giving the feedback.

Likewise, when our employees want to get information on any issue related to the company's operation or to report any negative situation / violation, they can ask their questions and make a report, if necessary, without revealing their identities. In particular, our employees who report any negative situation or violation are protected from retaliation.

12.2. Communication with External Stakeholders

We believe in the importance of open, transparent and honest communication with all our stakeholders, and we care about our stakeholders' opinions and expectations. We meet with all our stakeholder groups in different channels and at varying frequencies depending on need. Effective communication is provided with our stakeholder groups through telephone and e-mail conversations, social media, customer satisfaction surveys, corporate website, and face-to-face meetings.

Our external stakeholders can also ask their questions and make a report, if necessary, without revealing their identities, when they want to get information about any issue related to the company's operation or to report any negative situation / violation. In particular, our external stakeholders who report any negative situation or violation are protected from retaliation.

13. MEDIA & SOCIAL MEDIA USAGE

We maintain our sensitivity to our company's brand reputation and company culture on social media channels and continue to manage these channels with this understanding. In media communication, we expect all employees representing our company to share information in a transparent, accurate, responsible manner that protects the brand value and image of the company. Except for official statements on social media, we do not share unverified information about our company and we know that protecting confidentiality is essential. In this regard, we expect our employees to act responsibly and carefully in accordance with the Code of Ethical Conduct.



14. INTELLECTUAL PROPERTY, PERSONAL AND CONFIDENTIAL INFORMATION

As Arkem Chemicals B.V., we know that it is prohibited to use or share personal, commercial, financial, technical, legal and/or similar confidential information of relevant parties for the benefit of ourselves or third parties, other than the purposes for which they are presented to us, and we accept the confidential information we have due to our roles and responsibilities. We take the necessary precautions to protect you. We use the information obtained only for the work that is required to be done within the framework of job descriptions. We comply with the relevant legislation and our obligations specified in the contracts when sharing trade secrets and other confidential information.

15. INFORMATION SECURITY (Information Leaking/Insider Trading)

As Arkem Chemicals B.V., we do not use, and we prevent the use of, confidential information of third parties with whom we have commercial activities, in a way that exceeds the minimum level required by our activity or in any way that we think will harm the relevant party.

We especially follow the issue of insider trading carefully and take precautions. We are obliged to protect the confidentiality, integrity and usability of all information that we are obliged to protect, including electronic, physical, printed, other media or verbal, the security of our company's and our stakeholders' information and information assets. Our employees are obliged to report unauthorized access to senior management as a priority.

16. SECURITY AND CRISIS MANAGEMENT

We take the necessary precautions within the framework of the emergency plan we have created to protect our company employees, information and information systems, and company assets against a possible terrorist attack, natural disaster and/or malicious attempts, and ensure communication with all necessary units and organizations. We ensure business continuity by keeping possible losses to a minimum.

17. TRUST, ACCOUNTABILITY, TRANSPARENCY

As Arkem Chemicals B.V., we act with a corporate governance approach that adopts the principle of being transparent and accountable in all our activities. By acting transparently and impartially in our activities, we provide an environment of trust in our relationships with our employees and all other stakeholders. With the principle of accountability we adopt in management, we can explain all our internal and external transactions with rational justifications.

18. STAKEHOLDER RIGHTS AND OUR RESPONSIBILITIES

18.1. Responsibility for Compliance with Laws and Legislation

As Arkem Chemicals B.V., we adopt it as a principle to act in accordance with the national and/or international agreements to which our country is a party. We act in accordance with all relevant laws, rules, legislation and regulations in the countries in which we operate and/or will enter the market.

We provide, manage and record information, documents and records regarding all our activities regularly and completely, and we ensure that our employees do the same. We ensure that contracts made with third parties are clear and understandable, in accordance with the applicable laws, legislation and ethical rules.

18.2. External Stakeholders

As Arkem Chemicals B.V., we conduct our relations with stakeholders honestly and fairly. We show due care to fulfill our obligations on time. We carefully protect the confidential information, corporate and personal integrity of our stakeholders. When choosing suppliers, we attach importance to their compliance with our ethical policies.

We consider the health and safety of our customers as a high priority. For a sustainable, healthy and safe cooperation, we transparently share all relevant documents (Analysis Reports, Safety Data Sheets, Technical Data Sheets, etc.) containing the suitability, harmfulness, storage and storage conditions of the products with our customers and all relevant third party stakeholders.

As Arkem Chemicals B.V., we take into account the feedback (surveys, complaints, suggestions, improvements) of all our stakeholders and carry out all necessary corrective and remedial actions.

18.3. Internal Stakeholders

At Arkem Chemicals B.V., we consider each of our employees to be an asset in his or her own right. Equal opportunities and merit are the basis for activities related to the selection, evaluation and talent management of our employees. For this reason, employees or candidates; issues such as views on life, social activities and membership of associations are considered to belong to the private life of the person concerned, and these factors, which do not affect business life, are not taken into account in professional assessments.

We are aware that our understanding of performance, balanced with unwritten social moral principles, increases the motivation of our employees and their belief in and commitment to Arkem Chemicals B.V., as well as their trust in each other and the spirit of solidarity. It is important to us that our employees are able to apply the basic values of lawfulness, honesty, sensitivity and respect, which they experience in our company, in their daily lives outside of work.

19. HEALTHY AND SAFE WORKING ENVIRONMENT AND CONDITIONS

To our employees and all other stakeholders in order to make the social and economic value we create sustainable; we provide a healthy, safe and dignified working environment in accordance with national regulations, UN International Labour Organization (ILO) standards and international agreements, and we undertake to act in accordance with these regulations. In order to ensure the continuity of a safe and healthy work environment, we provide training/information on occupational health and safety to our stakeholders. We care about setting an example for our stakeholders with our practices on Occupational Health and Safety.

Arkem Chemicals B.V. ensures that its employees take regular breaks and vacations, at least within the legal limits, and that they have an effective work-life balance by respecting the maximum weekly working hours. Wages and social benefits are paid in accordance with the law, on time, fairly and in accordance with the scale based on rational data obtained through market research. Leave, such as maternity leave, sick leave and administrative leave, is also granted in accordance with the law.



If an unsafe condition or behavior is detected in the work area, Arkem Chemicals B.V. immediately takes the necessary precautions and measures to ensure the health, safety and security of employees and/or third party interests (customers, suppliers, neighbors, etc.). Necessary care is taken to follow up notifications within this scope.

20. SOCIAL RESPONSIBILITY PROJECTS AND DONATIONS

The understanding of social responsibility is not limited to and dependent on the effects and results of economic activities, the priority is people, society and nature. As Arkem Chemicals B.V., we take part in social responsibility projects and participate in donation campaigns on issues such as education, environment and sustainability. We see donations made to associations and organizations within the scope of social responsibility as unrequited investments that should not be evaluated with the commercial efficiency of our company. However, it is essential that these donations do not create any direct or indirect benefit to our company that could create a conflict of interest. We care about setting an example for our stakeholders with our social responsibility projects.

21. ENVIRONMENT

With the awareness that natural resources are not infinite and unlimited, we create a sense of responsibility by keeping our activities in terms of protecting the environment and natural resources ahead of our commercial efficiency. We develop practices that will set an example for our employees and all other stakeholders, especially in our activities aimed at protecting the environment and natural resources, and encourage them to protect the environment and natural resources in their own living spaces.

As Arkem Chemicals B.V., we aim to continuously improve with an effective environmental management system by providing the necessary technical, financial and human resources at every stage of our activities. All kinds of support is provided by the senior management to implement the best environmental solutions beyond legal obligations, to help the development and dissemination of environmentally friendly technologies and to increase environmental awareness.

22. SUSTAINABILITY

As Arkem Chemicals B.V., we operate and develop our business in accordance with our principles on issues such as human rights, working conditions, the environment and anti-corruption. We are aware that creating an awareness of sustainability is a necessity for the needs of future generations, and we aim to set an example for all our other stakeholders in all the work we do with this understanding. We care that the third parties we do business with also embrace sustainability in their fields of activity, and we adopt sustainability as a principle in our choices.



23. CODE OF ETHICAL CONDUCT PRACTICES AND NOTIFICATION OF VIOLATIONS

Employees and all other stakeholders are obliged to comply with Arkem Chemicals B.V. Code of Ethical Conduct and related policies while carrying out their work. Establishing, developing and ensuring the applicability of the Code of Ethical Conduct and related policies; when these rules are violated, it is the responsibility of the management of Arkem Chemicals B.V. to investigate and resolve the relevant notifications.

23.1. Stakeholders' Ethical Violation Notifications

Arkem Chemicals B.V. allows all employees and third-party stakeholders (contractors, partners, suppliers, customers, etc.) to report their concerns anonymously through the Advisory and Reporting Line. Situations such as behaviors that violate the Code of Ethical Conduct and related policies, violations and abuses of laws and regulations, potential risk notifications, and information security breaches are reported verbally or in writing via ethics@arkem.com. Reports made in languages other than Dutch are also considered and evaluated.

The identity of the employee/person reporting the violation is kept confidential within the framework of legal and administrative requirements. Anonymous violation notification applications are definitely taken into consideration. However, it is recommended to share contact information in order to ensure an effective and fair review, request for additional information when necessary, evaluation and/or information about the outcome of the process. It is expected that untrue statements will not be made in order to use resources effectively and efficiently and to avoid damaging the reputation of employees. Notifications that appear to be malicious or deceptive will be removed from the process.

23.2. Violation Reporting Channels/Accessibility

For all consultations, notifications, and reports, the following communication channels can be used:

Ethics Phone Line: +31 (0) 85 023 11 30

Ethics Email Line: ethics@arkem.com

Post Address: Nevelgaarde 20M 3436 ZZ Nieuwegein/Netherlands

23.3. Providing Information to Third Parties

If the identified or suspected misconduct directly or primarily involves third parties or is subject to the legal liability of third parties, it may be more appropriate to report these concerns to third parties. However, approval from the senior management must be obtained before reporting to any third party.

23.4. Information to be Required in the Notification

The notifying party shall, as far as possible;

- » A summary of the detected or suspected misconduct, the identity of the parties involved, the reported incident to the extent within its knowledge, and details of when, where and how it occurred,
- » Names of people suspected of participating in the action (Arkem Chemicals B.V. employees and non-Arkem Chemicals B.V. employees)
- » List of names of people who may have information about the suspicious transaction or action,
- » How the relevant information was obtained,
- » If a damage has occurred and, if possible, an estimate of the damages suffered by Arkem Chemicals B.V. or other third parties,

- » The location of the violation or disruption of concern within all processes,
- » Recommendations regarding the actions/measures to be taken (This article assumes that the person making the notification may also have business knowledge and technical infrastructure that can make suggestions for prevention),
- » The name and contact information of the person making the notification must be shared (within the scope of identity and information confidentiality).

23.5. Post-Notification Process

The reporting process is initiated expeditiously. This process, coordinated by the Senior Management, must be initiated within three business days of the notification date. This period may be extended if necessary for preliminary preparation. If the reporting party attends any meeting as part of this process, the Senior Management may, if deemed appropriate by the Senior Management, request that a colleague or authorized legal expert accompany them, in accordance with the confidentiality required by the investigation. The same recommendation should be made to the party against whom the report is made. Where appropriate, the reporting party will be regularly informed about the progress of the investigation and the actions to be taken.

The purpose of this report is to determine whether wrongdoing has occurred and, if so, to what extent, to reduce the risk of further wrongdoing, to protect all evidence by preventing loss of resources and reputation, and to ensure that the individuals involved in the reported incident are fully and completely exercised in their right to a defense and to ensure that investigations and inquiries are conducted fairly. If deemed necessary, an external investigator or investigation team may be appointed. Suspected perpetrators of wrongdoing will be subject to sanctions if, following an investigation, it is determined that wrongdoing has occurred. If the wrongdoing is likely to constitute a crime under applicable legislation, the Misconduct Follow-up Report will be forwarded to judicial and/or administrative authorities.

23.5.1 Responsibilities to the Notifier

The Senior Management is responsible for the reporting party:

- Arranging a meeting with the reporting party to discuss the incident (unless the report is anonymous);
- Informing them of their right to have a legal advisor or colleague accompany them during the meeting;
- Informing the reporting party about developments, while also respecting the confidentiality of the investigation;
- Informing the reporting party about the outcome of the investigation.

23.5.2 Responsibilities Towards the Person Notified

The Senior Management is responsible for:

- Taking all necessary measures to protect the privacy, personal rights, and reputation of the reporting party;
- Protecting the reporting party against any retaliation and taking the necessary precautions;
- Providing a written notification;
- Informing the person of the seriousness of the allegations and providing them with the opportunity to defend themselves, both verbally and in writing, and to gather and evaluate relevant evidence;
- Providing written information about the process to be followed, in a manner that does not interfere with the investigation and inquiry activities.

23.6. Protect of Privacy

All investigation and inquiry information will be kept confidential. The identity of the reporter may need to be disclosed due to the nature of the evidence, written or verbal statements, or disclosure. In such cases, the reporter will be provided with the necessary information before their name is disclosed. If the reporter needs to participate in an investigation (e.g., to present evidence), the reporter's report, now identified as a witness, will be kept confidential to the extent possible.



23.7. Preventing Retaliation and Abuse

Arkem Chemicals B.V. protects the confidentiality of those reporting violations and does not tolerate any potential retaliation against those who report them. Except in cases where the report is malicious or deceptive, retaliation against a reporter, including demotion, disciplinary action, dismissal, reduction of salary or other benefits, change of position, or similar actions, will be taken solely for reporting. Should anyone attempt retaliation, appropriate action will be taken.

Misconduct is completely and completely unacceptable at Arkem Chemicals B.V., regardless of local law. Arkem Chemicals B.V.'s employees and all other stakeholders are responsible for preventing misconduct.

23.8. Compliance and Performance Measurement

Compliance and compliance assessments with the Arkem Chemicals B.V. Code of Ethical Conduct are monitored by the Senior Management. Performance-related KPIs (number of reports, resolution rate, resolution time, etc.) are determined and monitored by the management.

Internal risk assessments are conducted and reviewed periodically as part of risk assessment procedures. To mitigate risk, employees are trained periodically on ethical issues such as combating corruption, bribery, and other issues.

23.9. Internal and External Controls

Internal control procedures are crucial for ensuring the company's financial security, keeping employees and managers under control, and preventing corruption. Regular review and improvement of these procedures ensures the company's long-term success. Internal controls are conducted by senior management, and work on these procedures is ongoing.

External controls are conducted and reported through third-party companies.

23.9.1 Risk Assessment and Management

Our company conducts regular risk assessments to prevent the provision, commitment, offering, acceptance, or solicitation of any advantage intended to encourage any illegal, unethical, or security-violating activity.

Risk Assessment: Departments, business processes, and positions at risk of corruption and bribery are identified, and detailed assessments are conducted for these high-risk departments. Anti-Corruption and Anti-Bribery Procedure (MNG-FACABP) and Corruption And Bribery Risk Analysis (MNG-CABRA) are published in the Quality Management System Manual.

Risk Prevention Measures: Cross-check mechanisms are established between positions for high-risk positions. Studies are also underway to determine additional auditing processes for these high-risk positions.

23.10. Employee Training and Awareness Programs

Anti-corruption and anti-bribery training: All employees, especially those in high-risk departments, receive regular business ethics training. This training addresses the impact of corruption on the business and its legal consequences.

Awareness programs: Awareness programs are organized to consistently emphasize the importance placed on ethical values and integrity within the company culture.

23.11. Notification and Reporting Systems

Confidential Reporting Line: A reporting line or reporting system should be established where employees can confidentially and securely report instances of corruption or bribery. This system can be designed to accept anonymous reports.

Confidentiality and Protection: Employees who report should be guaranteed protection. This will increase employee encouragement to report the situation.

23.12. Legal Compliance and Cooperation

Legal regulations: We monitor and comply with legal regulations regarding corruption and bribery in the countries where our company operates.

Collaboration with authorized institutions: When cases of corruption and bribery are detected, we cooperate with authorized institutions when necessary.



Code of Ethical Conduct

Nieuwegein / The Netherlands
Nevelgaarde 20M
3436 ZZ Nieuwegein
Phone +31 (0) 85 023 11 30
Fax +31 (0) 85 023 11 31
e-mail: contact@arkem.eu

