



# Global Standards of Business Conduct

*Revision date: January 2023*



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## Message from our CEO, John Panichella

As we continue to progress in our journey, one fundamental aspect of Solenis will never change: we must always maintain the highest standard for business responsibilities and ethics. We are passionate about growing our company and building our culture based on a core-value foundation of respect, integrity and accountability. The cornerstone of this foundation is our Global Standards of Business Conduct, also referred to as the Code. Success at Solenis depends on our steadfast focus on our Deliberate Ethics<sup>SM</sup> Culture. Deliberate Ethics is a mind-set of being intentional about driving and maintaining a high-performance culture while staying true to our core values through our actions and words and keeping the Code top-of-mind. This is the responsibility of every Solenis employee, officer and director, worldwide.

Our Code is a how-to guide for doing business globally at Solenis. Embrace the Code in both letter and spirit! Where the letter of guidance is not specific, the spirit must prevail. Thank you for following the Code, living our core values, and helping to keep Solenis a well-respected and ethical citizen in the global marketplace.



Regards,



John Panichella  
CEO

## Overview

*“The Solenis brand is valued and respected globally not just for the products and equipment we make, the solutions we generate and the value we create, but also for how we conduct business and operate in the marketplace. How we do what we do matters to our colleagues, customers, investors, business partners and communities. The value-proposition for consistently operating through our Deliberate Ethics lens has never been clearer.”*

**– Royce Warrick, Senior Vice President, General Counsel**

As a global company, we recognize the challenges of operating around the world. While observing the many laws that have international application, we are also mindful of observing diverse local customs and the laws of the countries in which we operate. If compliance with the Code or other corporate policies or procedures appears to conflict with international or local laws or regulations, employees should discuss their concerns with the Legal Department or the Office of Ethics and Compliance.

All Solenis employees, directors and officers, wherever located, are expected to comply with the Code. Any business partners, including any agents, contractors, distributors, consultants or other third-party representatives, acting on behalf of Solenis in any country, should be provided with a copy of the Code and are expected to comply with these requirements. Specific policies and procedures support and supplement the Code and govern appropriate business behavior. Our policies are available on [solenis.com](http://solenis.com) and the company intranet.

Any exceptions to the provisions contained in the Code or any related policy require advance approval by the Legal Department or the Office of Ethics and Compliance.

If you have questions or need interpretation of a specific law, regulation or policy, please contact the Legal Department or the Office of Ethics and Compliance.

### **Your Responsibility and Accountability**

We face challenges and difficult decisions every day. Each of us is responsible for making good decisions so that as a company, we live up to our commitment to act in accordance with our core values of respect, integrity and accountability. We all are expected to understand and comply with the provisions of the Code, our policies and procedures and the law and to always conduct company business with the highest legal and ethical standards.

Violations of the Code, any company policy or any applicable law are expressly prohibited and are always contrary to our best interest. If you commit a violation, you and, in some cases, the company may face serious consequences. Personal consequences may include disciplinary action, employment termination and damage claims. Furthermore, some violations may also give rise to criminal prosecution of the employees involved, the company and/or officers and directors of the company.

If you receive information or have reason to believe that our company, another employee or any person acting on our behalf, has violated or is violating the Code, any company policy or the law, you must promptly report it via the Share Your Concern page on the company's intranet or by contacting the Human Resources Department, the Legal Department, the Office of Ethics and Compliance or your manager. Specific laws, regulations, policies and procedures in your country may contain additional reporting requirements or limitations that must be followed.

You may report any suspected violations in confidence and without fear of retaliation. We will not tolerate any reprisal, harassment or retaliation against anyone who, in good faith, reports a known or suspected violation. The company will investigate occurrences of possible retaliation and discipline employees who have retaliated against someone who has reported possible misconduct.

All employees are required to cooperate fully in company investigations and to maintain the utmost confidentiality to preserve the integrity of investigations. Failure to cooperate or providing false or misleading information during an investigation may lead to disciplinary action up to and including suspension, termination, or both.

### **Compliance Program**

The Code is the foundation of our comprehensive, worldwide compliance program, underscoring our commitment to our core values, the law and high ethical standards. The program requires training and education for employees, completion of compliance assessments and audits, and driving personal accountability through communication and awareness initiatives. The Office of Ethics and Compliance and senior executives provide oversight and direction for the program.

### **Annual Certification of Compliance with the Code**

Annually, all Solenis employees are required to review the Code, certify compliance with its provisions and supporting policies, and as part of the same process, report any known or suspected Code or policy violations and conflict of interest situations. We will follow up on and investigate, as needed, any issues reported during the certification process.

### **Responsible Care\*\* Framework**

Solenis employees strive for excellence in global environmental, health, safety and security performance. Our Responsible Care framework reflects this focus and is an integral part of our values and operating principles. We integrate environmental, health, safety and security activities and awareness into business planning and operating practices, while establishing accountability at all levels of the organization. Everyone is expected to act with integrity and honesty to create and maintain safe work environments, to protect human health and to comply with the law.

### **Making Good Decisions**

Although the Code highlights the key principles that guide our behavior, it cannot address every situation. If a situation arises that is not addressed in the Code or where the right action to take or how to do it is not clear, consider these basic questions before you act:

- Is it legal?
- Is it consistent with the Code?
- Does it follow our policies?

- Would my actions tarnish the company's or my reputation?
- Would I be embarrassed if my actions became public or appeared on the Internet?
- Am I willing to be held accountable for my actions?
- Did I include all the right people when making the decision?

If you are still unclear about what to do, seek guidance from the Legal Department, the Office of Ethics and Compliance, the Human Resources Department, your manager, or ask a question via the company's Share Your Concern intranet page.

## Responsibility to Each Other

We believe in treating people, including third parties, with dignity and respect. As employees, we are expected to hold ourselves accountable, at all times, to high professional standards with integrity and mutual respect being the basis of all professional relationships.

### Human Rights

As a multinational organization, Solenis has been purposeful in fostering a culture of respecting human rights across our operations, supply chain and activities related to our business. We monitor and evaluate our activities, provide evidence and actively engage with third-party stakeholders who acknowledge our commitment. Solenis follows the norms and principles in the Universal Declaration of Human Rights and other major multinational agreements and strives to embed human rights through a variety of measures, including training, communication campaigns and open dialogue. We have reporting mechanisms in place to make sure we hear concerns. Where human rights violations are identified, we implement appropriate remediation.

### Respect for Others

All employment applicants and current employees are judged by their qualifications, demonstrated skills and achievements without regard to age, disability, gender, genetic characteristic, national origin, race, color, religion, sexual orientation, veteran status, trade union membership or any other personal characteristics that are protected by law. We are committed to maintaining a professional and safe work environment free from violence, intimidation, discrimination and harassment.

### Diversity, Equity and Inclusion

Solenis conducts business in more than 120 countries, and our employee base, comprised of a diverse array of nationalities working in more than 40 countries, reflects the different cultures and markets in which we operate. We value diversity, equity and inclusion as a competitive advantage, and believe the diversity of our employees working in an inclusive and equitable environment allows us to be more creative, agile and effective in delivering innovative technologies and solutions to customers and enhancing value to Solenis. We are committed to building a workforce of employees with different backgrounds, identities, experiences and perspectives and to fostering a work culture that embraces, embodies, celebrates and makes the most of those differences.

### Harassment Prevention

Solenis is committed to maintaining a work environment free from harassment or unprofessional behavior, where people are treated with respect and dignity. Harassment of any form is prohibited, whether the harassment is experienced or committed by an employee, customer, supplier, vendor, contractor or visitor.

Harassment is unwelcome conduct, whether verbal, nonverbal or physical, that is based on a person's actual or perceived age, disability, gender, genetic characteristic, national origin, race, color, religion, sexual orientation, veteran status or other protected group status. It includes unwelcome sexual advances, requests for sexual favors and other unwelcome or abusive verbal or physical conduct. Employees are encouraged to help each other by speaking up when another individual's conduct makes them uncomfortable and are expected to immediately report any behavior they believe is inconsistent with the Code or our policies.

### **Environment, Health and Safety**

As part of our commitment to the Responsible Care framework and to continuous improvement in our performance, we are committed to providing a safe and secure workplace for our employees and the communities in which we operate. To that end, each of us must live a culture in which negative environmental, health, safety and security incidents are discouraged and prevented. We are committed to and believe in a zero-incident safety culture. A zero-incident culture does not just happen. It occurs as a positive result of behaviors and a mind-set that actively seeks a world-class safety standard. Our employees take responsibility for their actions because they are empowered to make informed decisions. Success depends on genuine commitment, basic operating principles, well-communicated visions, and most importantly, a business atmosphere where all employees care for each other.

Safety is approached proactively. Positive safety behaviors, as well as potential risks and hazards, are identified. Coaching or being coached for safety is accepted without fear of retribution. If an incident does occur, follow-up on the event is recognized as being important for determining the root cause so that preventive actions can be taken to minimize the potential for that or a similar incident to happen again. In this environment, a zero-incident culture is the norm.

Everyone is responsible for observing the rules and practices that relate to on-the-job health and safety. This includes immediately reporting incidents, injuries and unsafe practices or conditions and taking appropriate and timely action to correct known unsafe conditions.

### **Substance Abuse**

The health and safety of all employees, and the quality and productivity demanded by customers and consumers, require us to report to work free from the influence of any substance that could prevent us from conducting work activities safely and effectively. The unauthorized use, possession or distribution of drugs or alcohol while on company business or at any business workplace is prohibited.

Anyone who suffers from a substance abuse problem is urged to seek assistance by contacting the Human Resources Department or the company's Employee Assistance Program.

Records associated with substance abuse counseling and the Employee Assistance Program are kept confidential, except to the extent disclosure is required by our policy, applicable law or to protect the life or safety of others. Enrollment in a treatment program will not excuse you from the consequences of a violation of the Code or company policy.



## **Safety and Security**

For our safety and security, the possession of firearms and other weapons is prohibited on all of our premises or while engaged in company business unless written approval is obtained in advance from Solenis' General Counsel.

Solenis strictly prohibits bullying, violence or the threat of such action in the workplace. If you or someone else in the workplace is being threatened with or subjected to such behavior, immediately contact the Human Resources Department, the Legal Department, the Office of Ethics and Compliance or reach out via the company's Share Your Concern intranet page.

Where permitted by law, the vehicles and personal possessions (such as handbags, lunch boxes, baggage, parcels and computers) of employees and other people entering any Solenis workplace are subject to inspection. Solenis also reserves the right to inspect all employee work areas (such as desks, cabinets, files and lockers). In addition, Solenis may conduct a full background investigation of each prospective employee prior to or during employment and may require drug screening as a condition of employment or continued employment.

We operate in locations that may restrict or prohibit background investigations, drug screenings and inspection of personal items. We will abide by any such applicable laws.

## **Responsibility to Solenis**

It is important for all employees to embrace our collective responsibility to uphold the values expressed in the Code, follow the appropriate guidelines, conduct business and interact with each other in a way that helps preserve the value of our business and safeguard the company's assets, and never hesitate to Share Your Concern or speak-up.

## **Business Records**

Employees who create or maintain reports, records or any other information are responsible for the integrity and accuracy of that information. Questionable entries or reports should be reported to an appropriate supervisor or manager. No one should allow himself or herself to become part of a chain of incorrect information.

Records must be maintained as specified by our Records Management Policy. Information responsive to an investigation, suspected investigation or lawful request must never be altered or destroyed and must be maintained as directed by the Legal Department. Maintenance of such records may be outside the normal retention period.

## **Financial Integrity**

We seek to create value by achieving superior financial results. In pursuit of this goal, we must always produce honest, accurate and complete financial information, follow strict accounting principles and standards and have appropriate internal controls and processes to ensure that all accounting and financial reporting complies with the law.

Everyone must do their part to ensure that no false or intentionally misleading entries are made in the company's accounting records. Intentional misclassification of transactions regarding accounts, departments or accounting periods violates the law and our policies. All business records must fairly reflect transactions, be supported by accurate documentation in reasonable detail and comply with treasury and finance policies, accounting procedures and internal

controls. In particular, all accounting records, expenditures, expense reports, invoices, vouchers, gifts, business entertainment and any other business expenses must be accurately and reliably reported and recorded.

All must have the responsibility to uphold our company's financial integrity standards and to cooperate fully with internal and external auditors. Information must never, under any circumstance, be falsified or concealed.

### **Anti-Money Laundering**

Everyone is obligated to conduct business in a way that prevents misuse of our business assets. We must adhere to anti-money laundering, financial crime and antiterrorism laws in all countries where we operate. To that end, Solenis has measures in place to ensure we work only with reputable partners who operate within the law and use resources obtained legally. We subject both suppliers and customers to comprehensive due diligence designed to flag inappropriate activities, including those that may be associated with illegally obtained money. Our engagement process includes identity and credentials-checks to facilitate transparent business relationships with reputable partners. We also train our employees about relevant functions within our company to help them identify and avoid any activities that could be construed as facilitation of tax evasion.

### **Protecting Confidential Information and Intellectual Property**

Protecting confidential information is the obligation of everyone and continues even if you leave the company. For example, employees should avoid discussing company confidential information (for example, trade secret information or chemical processes) in public places or with anyone who does not need to know the information. All computers, especially laptops, should be secured and used in compliance with our policies.

We require confidentiality agreements with parties to whom our confidential information is disclosed. Questions about the confidentiality of information or the need for a confidentiality agreement should be directed to the Legal Department.

In addition, the property (such as programs and software) and information (such as customer lists, price lists, contracts or documents) owned by others may be used only according to the terms of our license or other agreement to use the property or information. Unauthorized copying of software, tapes, books and other legally protected work is a violation of law that has potential financial consequences.

Using the intellectual property or confidential information of others without proper authorization is prohibited and can result in disciplinary action (up to and including termination), significant fines, criminal penalties, civil lawsuits and damages for our company and for individual violators. Additionally, we should never try to persuade or otherwise encourage employees or former employees of other companies to violate their confidentiality obligations to those companies.

Confidential information includes, but is not limited to, proprietary technical information, business plans, status of operations and equipment and non-public financial data. It further includes other non-public information that would be of use to competitors or harmful to Solenis if made public (such as inventions, trade secrets, formulas, customer lists and legal advice).

## Privacy

Privacy is recognized as a basic human right, and Solenis takes the privacy and protection of personal data very seriously. We treat personal data confidentially. We collect it and use it in accordance with applicable laws and regulations. This applies not only to our employees' data, but also to the data of our customers, suppliers, business partners and other individuals with whom we work. We have effective policies and procedures in place that assure the lawful, fair, transparent and confidential handling of personal data entrusted to Solenis. Solenis has a global data privacy approach that complies with applicable global regulatory requirements.

## Protecting Company Assets

We all have a responsibility to safeguard and make proper and efficient use of company assets. This includes taking prudent steps to protect assets from loss, damage, misuse, theft, embezzlement or destruction. Our assets are intended to be used to conduct legitimate company business. Any act that involves theft, fraud, embezzlement, destruction, misuse or misappropriation of any asset is prohibited.

If applicable law does not specifically require otherwise, work and other property prepared by and created for the company belong to the company, including, but not limited to, any inventions, patents or copyrights developed while working for the company.

## Responding to the Media

Employees should refer to the Communications Department or the Legal Department any request that is addressed to the company, from the media or other third parties, for information about Solenis.

## Conflicts of Interest; Disclosure

Our shareholders expect business decisions to be made in the best interests of the company and its shareholders. Your decisions and actions must be based on sound business judgment, not on personal interest or for personal gain, to avoid conflicts of interest. Therefore, avoid situations where company interests may conflict with your personal interests.

The appearance of a conflict can be as damaging as an actual conflict. Solenis employees are required to immediately disclose to the company any situation that is a conflict of interest or has the potential to be interpreted as a conflict of interest by others, including other employees, customers, suppliers and the public. Potential conflicts of interest include, but are not limited to, the following:

- personal relationships that can cause an employee to improperly prioritize her or his personal interests
- personal financial interests that can interfere with an employee's work-related duties
- pursuit of business opportunities for personal or financial gain, at the expense of company interests
- external mandates or activities that may prevent an employee from acting in the company's best interest or reflect negatively on Solenis
- receipt of any unauthorized fees, commissions or excessive gifts or entertainment that may influence an employee's judgement or cause an employee to act in a manner that is not in the company's best interests

Employees also must consider potential conflicts with Solenis business interests before agreeing to serve as an employee, director or officer for an outside business; before seeking a political or other government position; and before engaging in service with a charitable, civic, religious, educational, public, political, or social organization.

Questions about and disclosures of these situations should be addressed directly to the Legal Department or the Office of Ethics and Compliance or via the company's Share Your Concern intranet page.

## **Responsibility to the Marketplace**

We depend on strong relationships with our customers, suppliers and other business partners. We intend to do business only with those individuals and businesses that comply with the law and demonstrate high standards of ethical business behavior. You are expected to identify and report legal or ethical issues (such as those involving environmental, health, safety, security, corrupt payments or practices, or competition/antitrust violations) concerning third-parties or customers that may pose a risk to the company. Such issues will be addressed immediately and appropriately.

### **Marketing Practices**

We compete for business aggressively and honestly and do not misrepresent our products, prices or services. We do not make false or misleading claims about our products, prices or services or about the products, prices and services of our competitors.

### **Purchasing Practices**

All purchasing decisions are based on the best value for the company and in alignment with our business standards and goals. Important components of purchasing include confirming the legal and financial condition of the supplier, complying with our conflicts of interest policy, soliciting competitive quotes, exploring partnering arrangements and incentive-based contracts and verifying quality.

### **Product Stewardship**

We provide quality products and services that add value for our customers and that can be used and processed in a safe manner. We strive to improve the products we sell by reducing the risk associated with their use or consumption while maintaining the value derived by the customer. The company puts in place processes to comply with country-specific regulations concerning the stewardship of our products.

### **Competitive Intelligence and Other Information Gathering**

We obtain information about competitors, competitors' products, customers and suppliers ethically and legally. Theft or misappropriation of third-party proprietary information is prohibited, including obtaining or acting to obtain such information from a competitor's current or former employees.

### **Antitrust and Competition**

We are committed to complying with the antitrust and competition laws of all countries where we do business. These laws are designed to encourage and protect free and fair competition. Anyone who has a question or concern about the potential antitrust or competition law

implications of a discussion, a decision (potential or actual), an interaction or an action (potential or actual) has the responsibility to consult with the Legal Department.

Generally speaking, employees are restricted or prohibited by antitrust and competition laws and company policy from:

- communicating with competitors about prices and conditions of sales, employee salaries, bids, levels of production
- allocating products, services, sales, customers, suppliers or territories
- establishing the resale price of a product
- conditioning the sale of products on an agreement to buy other Solenis products
- making decisions to price product below cost
- agreeing with a third-party to limit manufacturing production
- agreeing with a third-party to refuse to deal with certain customers, suppliers or even other competitors.

In addition to damaging our reputation, violating antitrust or competition laws could subject us and the violator to severe monetary penalties or civil or criminal enforcement by one or more governments or lawsuits by competitors, customers and other affected parties seeking damages.

### **International Trade Regulations**

Many laws govern the conduct of our international trade. The following sections identify a few of these laws.

#### **Anti-Boycott**

No employee may cooperate in any way with an unsanctioned foreign boycott of countries as provided under U.S. law. The most well-known prohibited international boycott is the boycott of Israel. Any request for information or action that seems to be related to this or any other illegal boycott should be forwarded immediately to the Legal Department.

#### **Economic Sanctions and Export Controls**

The laws of the United States and those of many other countries restrict trade with certain countries. We have operations and customers around the world and must comply with all economic restrictions and applicable export control laws of all countries where we conduct business. Employees and agents uncertain of what restrictions may apply and how to comply with the applicable trade regulations should contact the Global Trade representative in the Supply Chain Department or the Legal Department.

#### **Anti-Corruption**

Solenis does not tolerate any form of corruption, including bribery — public or private, active or passive. Solenis employees and business partners are prohibited from giving, promising to give, soliciting or accepting any form of improper advantage, whether directly or indirectly, to or from any individual or organization with the intention to obtain or retain business. Improper advantage may be of any value and come in different forms, including payments (bribes, illegal rebates, kickbacks), gifts, meals and entertainment.

Solenis' anti-bribery and corruption rules apply globally to all of the company's public and private business transactions. Many countries have strict anti-bribery laws and regulations,

including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act. Solenis demands from its employees and business partners strict compliance with these laws.

### **Gifts, Meals and Entertainment**

In many industries and countries, gifts and entertainment are used to strengthen business relationships. Throughout the world, one principle is common and clear: no gift, favor or entertainment should be accepted if it obligates or appears to obligate the person receiving it. We maintain specific policies regarding providing and accepting gifts, meals and entertainment. These policies are accessible on the Solenis intranet or through the Legal Department, the Office of Ethics and Compliance or your manager.

### **Providing and Expensing Gifts**

Gifts, meals or entertainment may not be provided if they are against applicable law or our or the recipient's company policy.

No form of entertainment should be undertaken that could reasonably lead to the embarrassment of the company or have the appearance of impropriety. Entertainment that is degrading or exploitive because of sexual or racial content is strictly prohibited. A gift of anything of value to a government official requires the advance written approval of the Legal Department.

### **Soliciting or Accepting Gifts**

Unless specifically permitted by our policies, you may not solicit or accept gifts, meals or entertainment, including, but not limited to, trips, lodging, event tickets, vacations and personal gratuities. Our policies strictly prohibit receipt of the following:

- a gift or loan of cash, cash equivalents (such as gift certificates) or securities
- a loan of property, including vacation facilities or equipment for personal use
- a personal service performed free of charge or for less than market value
- a discount on the purchase of goods/services for personal use.

### **Inside Information**

Because of our job duties, we may receive confidential information about Solenis, customers or other companies with which we do business or intend to do business before the information is publicly available to others. Some of this non-public or inside information may be considered material to investor decisions and could create an unfair advantage if securities or other enterprise interests are bought or sold based on such information. Employees are prohibited from using, encouraging others to use, or facilitating the use by others of non-public information about Solenis, or about other companies with which the company does business or intends to do business, for personal benefit including, but not limited to, securities trading.

## **Responsibility to the Community and the Government**

Protecting human health and the environment is an important responsibility and is part of our business strategy as a Responsible Care company. We work to reduce our environmental impact by reducing or preventing waste generation, emissions and releases, and by developing processes to safely use, handle, transport and dispose of all raw materials, products and wastes for which we are responsible. We help others understand their responsibilities to ensure that they use Solenis products in a safe and responsible manner. We strive for continual improvement in our performance and in our partnerships with governmental agencies, contractors and communities.

Each of us has the responsibility to act in a manner that reduces the risk of incidents that may adversely impact human health or the environment, and we are expected to support this commitment by:

- carrying out our responsibilities in compliance with laws, regulations and our company policies
- consistently implementing all work practices to protect the environment and to prevent personal injury or property loss
- actively encouraging care and regard for the environment among co-workers and in the community
- identifying opportunities to continuously improve environmental, health and safety performance
- immediately reporting any actual or potential environmental, health, safety or security problems to your manager, to the Environment Health and Safety Department or via the Share Your Concern page on the company's intranet.

### **Communities**

We seek opportunities to work with the communities in which we do business. As a good corporate citizen, we act responsibly, conduct operations safely and prepare for emergencies that may occur. We also give back to the community by supporting and partnering with educational, civic and charitable organizations.

### **Political Activities**

Many governments have laws prohibiting or regulating corporate contributions to political parties, campaigns or candidates in the form of cash or the use of corporate facilities, aircraft, automobiles, computers, mail services or personnel. In addition, our own policies prohibit certain political contributions, even though otherwise permitted by applicable law. Any proposed use of company resources in support of any political contributions or activities in any country must be pre-approved by the Legal Department.

Lobbying activity on behalf of the company is permissible but is highly regulated by law. Employees who communicate with government officials on behalf of Solenis must contact the Legal Department to ensure that such activities fully comply with the law and our policies.

We respect everyone's right to participate in the political process and to engage in political activities of his or her choosing. However, you must make clear that your views and actions are your own and not necessarily those of Solenis. Employees may not use company resources to support their personal choice of political parties, causes or candidates.

### **Requests from Government Agencies and Authorities**

Solenis cooperates with reasonable requests from government agencies and authorities. Solenis is entitled to all of the safeguards provided by law to any person from whom information is requested or who is the subject of an investigation, including representation by legal counsel from the very beginning of the investigation. Therefore, all requests for information beyond what is provided on a routine basis must be immediately reported to the Legal Department.

## Where to Get Help, Report or Share a Concern

Every employee is required to make an immediate report (whether based on personal knowledge or not) of any suspected or actual violations of the Global Standards of Business Conduct (the Code), any other corporate policies or procedures, or any applicable law by contacting the Legal Department, the Office of Ethics and Compliance, the Human Resources Department, or a manager, or by submitting a report via Share Your Concern intranet page.

Similarly, any issue concerning the company's financial integrity, including questionable accounting or auditing matters, should be reported immediately to the General Counsel or the Office of Ethics and Compliance, or by submitting a report via Share Your Concern intranet page. If requested, the General Counsel will arrange for concerns to be submitted anonymously to the board of directors.

The hotline function on the Share Your Concern page is available 24 hours a day, 7 days a week; translation service is available for callers who speak languages other than English.

All calls can be completely anonymous and are handled in a confidential manner. We disclose the substance of a report or the identity of the person making the report, if known, only on a need-to-know basis, to the extent deemed necessary by the company in order to conduct a thorough investigation and to respond appropriately to the report.

Share Your Concern / Hotline:

United States and Canada: 833 203 3981

For other countries, [click here for the access code and phone numbers](#).

### Non-Retaliation Policy

We will not permit any form of retaliation against an employee who reports, in good faith, any actual or suspected violation of our Code, any company policy or the law. Intentional submission of a false report will not be tolerated. If you believe you have been retaliated against for making a good faith compliance report, you should immediately contact the Human Resources Department, the Legal Department or the Office of Ethics and Compliance.

### General Information

This Code is a guide for the uniform management of company expectations and rules that affect our operations. Nothing in this document, in any company policies and procedures or in other related communications (oral or written) creates or implies an employment contract or a guarantee of continued employment. The company reserves the right to modify, change or alter any section of this document at any time, as needed.

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