

Supplier Code of Conduct

1. Purpose

At MINASOLVE Specialties, we are a company whose foundation began with sustainable chemistry principles at its core more than 70 years ago. Our suppliers are critical to the long-term sustainability of our company. The MINASOLVE Specialties Supplier Code of Conduct is applicable to all suppliers providing goods and services and engaged in business with us in any way. This is MINASOLVE Specialties, commitment to ethical and compliant work practices, and it is our expectation that our suppliers will follow this guideline and apply it to their supply chains. MINASOLVE Specialties may visit suppliers to assess compliance with our Supplier Code of Conduct. Adherence to the requirements may be considered in making sourcing decisions. Failure to comply may result in termination as a supplier.

2. Supplier Commitments

The Supplier agrees to comply with the following principles:

Ethical Business Practices

- **Anti-Corruption and Bribery:** Suppliers are prohibited from participating in activities that promote bribery (soliciting, offering, or accepting a bribe in money or other forms of payment such as cash, kickbacks or kickback schemes, unexplained rebates, payments for advertising or other disguised allowances or expenses) or encourage bribery. Suppliers must comply with all applicable regulations and laws to prevent corruption and bribery.
- **Antitrust and Fair Competition:** Suppliers are prohibited from participating in activities such as price fixing, predatory pricing, or taking inappropriate advantage of social or financial conditions to gain unfair advantage.
- **Compliance with Laws and Regulations:** Suppliers will comply with all applicable laws and regulations in all countries where business is conducted.
- **Conflicts of Interest:** Suppliers must avoid all transactions or relationships that are or appear to be conflicts of interest and could possibly impact or cause difficulty for Penn A Kem, LLC, employees to complete their daily duties.
- **Conflict Minerals:** Suppliers that incorporate certain minerals (tin, titanium, gold, and tungsten) into their products and processes must ensure they come from conflict-free sources.
- **Data Privacy:** Suppliers will follow all existing and relevant data privacy regulations.
- **Export/Import Controls, Trade and Sanctions:** Suppliers must comply with all regulations and laws that govern the import/export of goods, sanctions/embargoes, and avoid conducting business transactions with persons or entities that may appear on restricted lists.
- **Gifts and Entertainment:** Suppliers are permitted to make reasonable and customary gifts to Company employees in the ordinary course of business, provided that no improper remuneration will be permitted under any circumstance. Furthermore, suppliers should avoid excessive or frequent gift-giving to Company employees; specifically, suppliers should ensure that any gifts to Company employees will not

be perceived as a bribe, payoff, or any other attempt to gain an advantage in any sourcing or other purchasing decision. Company employees cannot accept or give gifts in excess of USD \$50.

- **Money Laundering, Financial Reporting, Record Keeping and Insider Trading:** Suppliers will comply with all applicable anti-money laundering laws and regulations. Suppliers should ensure that proper written records are maintained when products or services are supplied to Penn A Kem, LLC. Suppliers are prohibited from conducting insider trading.
- **Protection of Intellectual Property and Trade Secrets:** Suppliers will implement measures to protect all intellectual property during business transactions. Information should be treated as confidential and provided on an as-needed basis.

Environmental, Health and Safety, and Quality

- **Environmental:** Suppliers must comply with all applicable environmental laws and regulations and industry best practices. Suppliers will conduct operations in such a manner to reduce risks and minimize impacts on the environment and surrounding community.
- **Health and Safety:** Suppliers should comply with all regulations and laws related to providing a safe, healthy work environment. Suppliers should proactively manage safety risks to prevent occupational injuries and illnesses from occurring.
- **Product Stewardship and Responsible Sourcing:** Suppliers should commit to material sourcing that meets all applicable regulations and laws to ensure customer health and safety.
- **Quality:** Suppliers should ensure that all products meet desired quality standards and expectations.

Fair Labor Practices and Human Rights

- **Child Labor, Forced and Compulsory Labor:** Suppliers are prohibited from the use of child labor, forced/compulsory labor, slavery, or human trafficking.
- **Diversity and Inclusion:** Suppliers will promote aspects of diversity and inclusion in their places of work.
- **Discrimination, Harassment, and Abuse:** Suppliers will not tolerate any forms of discrimination, harassment, or abuse and treat all employees equally, regardless of their characteristics. All employees should be treated with dignity and respect.
- **Freedom of Association and Collective Bargaining:** Suppliers will respect and recognize employee rights to seek labor representation and bargain collectively.
- **Working Hours, Wages and Benefits, and Working Conditions:** Suppliers will comply with all legal minimum wage laws and overtime requirements and provide all legally mandated benefits. Suppliers will not require employees to exceed the maximum working hours set by regulation.
- **Retaliation:** Suppliers will ensure that all employees will not suffer from retaliation when raising or reporting employment concerns.

3. Compliance and Monitoring

MINASOLVE Specialties reserves the right to conduct visits and assessments to verify compliance with the **Supplier Code of Conduct**. Adherence to these requirements will be a factor in sourcing decisions. Non-compliance may result in corrective action, up to and including termination of the supplier relationship.

4. Acknowledgment and Acceptance

By signing this, the Supplier acknowledges receipt of the **MINASOLVE Specialties, Supplier Code of Conduct**, affirms its commitment to comply with its requirements, and agrees to implement the necessary measures to uphold these principles within its supply chain.

IN WITNESS WHEREOF, the undersigned parties have executed this as of the date set forth below.

For MINASOLVE Specialties:

Authorized Representative

MINASOLVE Specialties

Date: _____

For [Supplier Name]:

Authorized Representative

[Supplier Name]

Date: _____

This is a formal acknowledgment of Supplier's commitment to MINASOLVE Specialties ethical and compliance expectations but does not create a legally binding contract or obligations beyond the stated requirements.