



THE ARCHROMA Code of Conduct



/ MESSAGE FROM OUR CEO

Dear Colleagues,

At Archroma, our purpose is to lead our industry towards a more sustainable future for our customers and markets guided by the principles of being safe and ethical. As we continue to grow and evolve, maintaining a strong ethical foundation is key to our success and we want to empower our people to act responsibly and speak up with confidence.

Our Code of Conduct is more than a set of rules. It is a reflection of what we believe as a company. It defines how we treat one another, how we engage with our customers, partners and other stakeholders, and how we can be a force for good.

At the heart of our Code of Conduct is our commitment to an open culture where people feel secure in seeking advice and in raising concerns. We ensure a retaliation-free environment for anyone who comes forward in good faith to ask questions or report violations. Proven retaliation will result in disciplinary action.

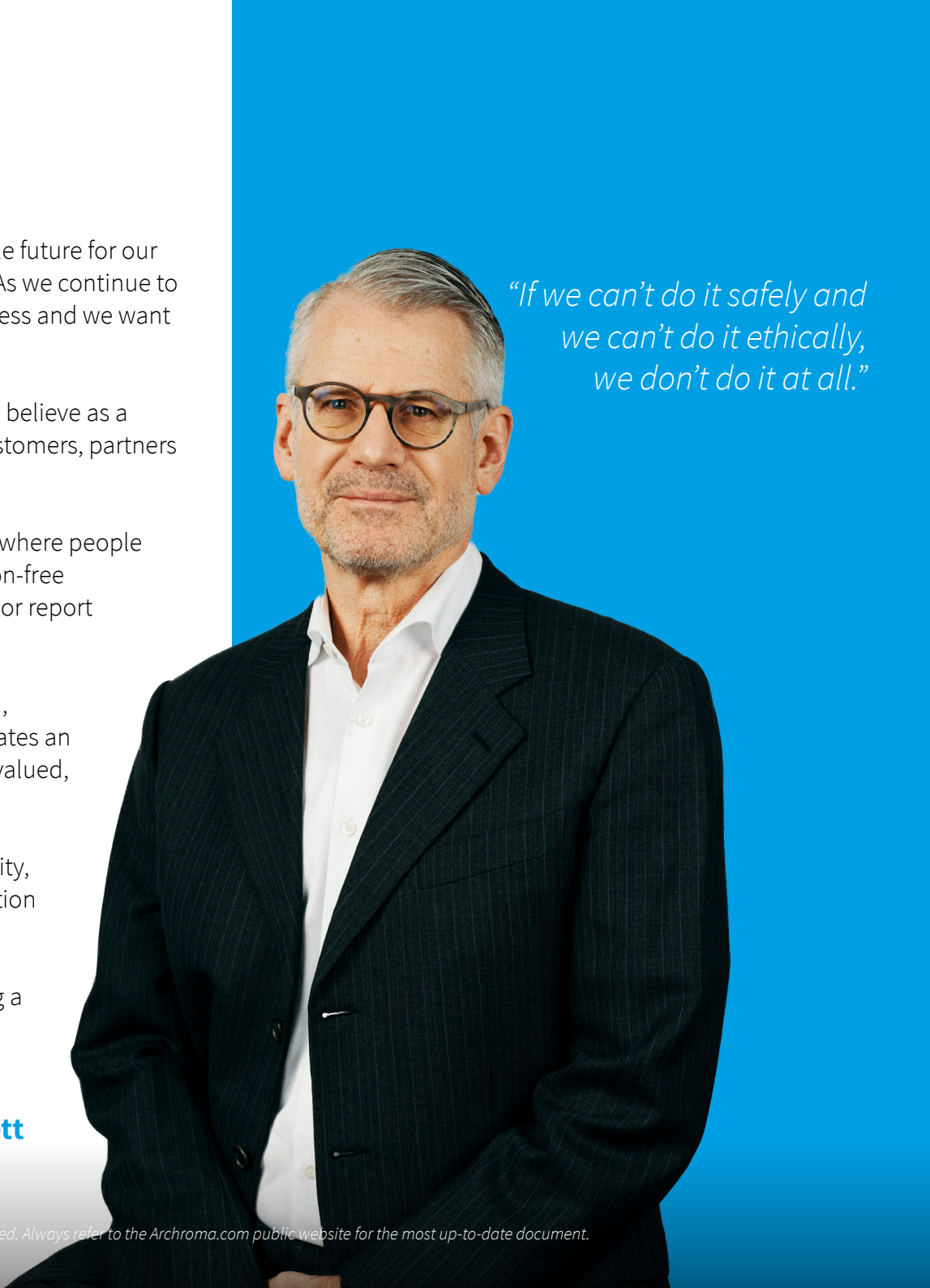
Upholding our Code of Conduct and ethical practices safeguards our brand, mitigates risks, and ensures compliance with laws and regulations. It cultivates an inclusive and respectful workplace where diversity is celebrated, ideas are valued, and everyone feels empowered to contribute.

Let us continue to build a culture anchored by our values of honesty, integrity, respect and responsibility, reinforcing our shared commitment and dedication to excellence.

Together we can succeed by bringing value to our stakeholders and making a positive effect on people's lives and society at large.

Thank you.

Mark Garrett
Group CEO



“If we can’t do it safely and we can’t do it ethically, we don’t do it at all.”

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1. OUR CODE OF CONDUCT

1.1 INTRO TO OUR CODE OF CONDUCT

At Archroma, our passion for who we are and for deciding and doing the right thing gives us a competitive advantage.

Each of us must live up to the Archroma Values of **integrity/honesty, respect, and responsibility** which are the foundation of our culture, our Code of Conduct and our ACCC Cultural Pillars so that we make the right decisions and do the right things every day everywhere. This unites us globally and guides us to foster trust and sustainable relationships with all our stakeholders including our employees, our business partners, our shareholders and our communities.

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Achieve and Exceed

- / We **relentlessly drive for achievements** and results
- / We succeed by taking **smart risks**
- / We believe that **it's possible** to create growth and success
- / We are **passionate for the business** and **inspired by our purpose**



Adapt and Innovate

- / We strive for **value-enhancing solutions** and services
- / We enrich our customers through **R&D-enabled innovation**
- / We embrace **agility for fast decision making**
- / We **pursue excellence** and we **push for more**



Center on Customer

- / We put **customer needs at the center** of all our decisions
- / We build **long-lasting relationships** with our customers
- / We co-create with **our customers to make them win**
- / We focus on **value creation together with our customers**



Collaborate and Embrace Diversity

- / We **collaborate** in a **diverse and inclusive** environment
- / We **empower our people** equally
- / We challenge each other in a **positive and respectful** way
- / We continuously **share knowledge** and ideas

Any action or business goal we pursue must be consistent with our AACC Cultural Pillars: Achieve and Exceed, Adapt and Innovate, Center on the Customer, and Collaborate and Embrace Diversity. As the foundation of our Code, these pillars unite us globally and guide us to foster trust and sustainable relationships by maintaining INTEGRITY with all our stakeholders:

- / EACH OTHER AS ARCHROMA EMPLOYEES
- / OUR CUSTOMERS AND BUSINESS PARTNERS
- / OUR SHAREHOLDERS
- / OUR COMMUNITY



What is the Code of Conduct?

- / Our Code sets out binding rules and guidelines for the employees, officers and directors of Archroma Management LLC, and all of its subsidiaries, affiliates and joint ventures (collectively, “Archroma”). It is also the foundation on which Archroma will conduct business with its vendors and business partners (see Archroma’s Supplier Code of Conduct).
- / When local customs or business practices conflict with our Code or Company policies, we follow our Code and policies unless, on an exceptional basis, we first obtain prior permission from the Legal Department to conform to such local customs or business practices.
- / When the Code sets a higher standard than the applicable law, then we follow the Code.

Before deciding or acting - we should ask ourselves these questions:

- / Am I adhering to our Code, our policies and procedures, and all laws that apply to my area of work?
- / Could my actions cause Archroma to suffer any negative consequences?
- / Is there anyone at Archroma who should know about or approve this action or decision?
- / Would I want my actions disclosed to the public? Would my family be proud of my actions?

Expecting Management to Lead by Example

Managers and supervisors are expected to lead by example. We believe this is the best way to promote Archroma’s values to our people, as well as our customers and business partners. As managers and supervisors, we are expected to:

- / Set the tone and act with the highest integrity and in full accordance with our values and the Code.
- / Communicate the importance of this Code, and be ambassadors of ethical conduct in general and to our direct reports.
- / Create a safe environment where our direct reports and other employees feel comfortable asking questions and raising concerns, avoiding and reporting any retaliation.
- / Escalate and report suspected violations of the Code or the law to the Archroma Legal or Compliance Team.
- / Ensure that our direct reports complete their training courses and certification as applicable.

1.2 COMPLIANCE SUPPORT AND REPORTING OF MISCONDUCT

The Code cannot answer every question but it provides the tools and resources to help navigate ethical challenges.

1.2.1 Seeking guidance and speaking up

It is very important that we have a culture where ethics is openly discussed and that we all create a safe environment to do so.

Seeking guidance: If at any time, you are in any doubt, please seek guidance and reach out to your line manager, local Human Resources team, the Legal Department or the Archroma Compliance Team whenever:

- / You have a question or concern about the contents of the Code, internal Company policies, applicable laws or a specific situation.
- / You are uncertain about how to act, something just does not feel right or you are influenced to act or decide in a certain way.

Speaking up: if you become aware of a situation that you either suspect or know will violate our Code, Archroma policies or applicable laws, it is your responsibility to report it as soon as reasonably possible via your choice of the following channels:

To make a report on-line, use the links:

- * **NAVEX One Compliance Hub:** <https://archroma.navexone.eu/>
- * **Web Intake Site URL:** <https://archroma.navexone.eu/peoplehub/home>
- * **Mobile Intake Site URL:** <https://archroma.navexone.eu>

Use on-line reporting and you can track your report from start to finish!

To make a report by phone call: Go to <https://archroma.ethicspoint.com> and select the country in which you are located. A local, toll free phone number is provided.

To make a report via e-mail: Use the following email address: compliance@archroma.com

The Archroma Compliance Team investigates all potential compliance violations in a professional and transparent way, making sure that everyone involved is treated fairly and upholding their protection including confidentiality, non-retaliation and presumption of innocence in accordance with applicable laws.

1.2.2 Ensuring Non-Retaliation

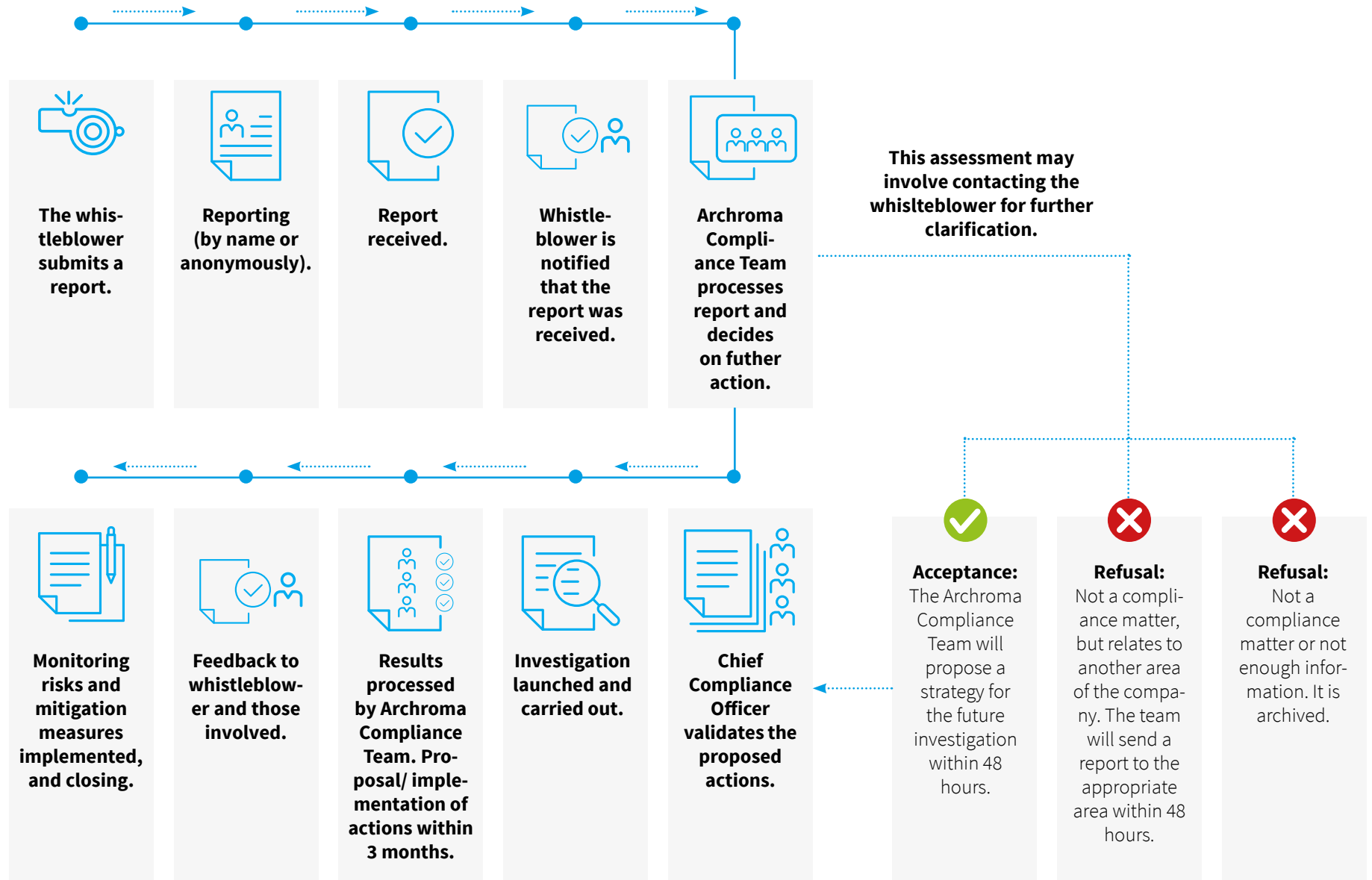
At Archroma, we do not tolerate retaliation. Retaliation is any negative consequence you experience as a result of making a report, participating in an investigation, asking a question or refusing to follow an instruction to act in a way that is inconsistent with the law, our Code or internal policies: this can include being inappropriately demoted, getting an unfairly negative performance evaluation or receiving an unjustified reduction in your bonus or pay or other more subtle actions such as being left out of meetings or projects. If you believe you have experienced or witnessed retaliation, speak up (see section 1.2.1.).

We encourage those who report a compliance breach to share their identity with us as this helps us to investigate efficiently. In any case, we always treat the identity of reporters confidentially and in accordance with applicable laws. However, to ensure that reported facts are investigated at all times, we also process **all anonymous reports** (except in jurisdictions where identification of reporters is or can be legally mandated).

1.2.3 When a Breach Occurs

When a breach of the Code or applicable laws is found to have taken place by an employee, Archroma will act quickly and fairly including taking all necessary disciplinary action such as dismissal and informing the authorities, if required. If one of our business partners breaches the Code, Archroma might end the business relationship and not engage them in the future. In addition, Archroma may inform the authorities, if required.

1.2.4 Whistleblowing Reporting flow chart



Note: timelines above are estimated timelines and maybe be shorter or longer subject to applicable laws.

2. RESPECT

2.1 DIVERSITY, ANTI-DISCRIMINATION AND SAFE WORKPLACE

2.1.1 Embracing diversity and inclusion

At Archroma, being a global company, our workforce is incredibly diverse. We embrace diversity not only because it is the right thing to do, but also because it is good business. We acknowledge that conduct that is socially and professionally acceptable in one country or region may not be acceptable elsewhere. It is important for us to adapt and be sensitive to other cultures while also remaining true to our Code and Company policies. We know that diverse talents and points of view enhance our teams, broaden our vision and result in better decisions.

WHAT WE DO:

- / We work together with people of diverse ethnic backgrounds, cultures, religions, ages, disabilities, races, sexual orientation, gender and gender identities, worldviews, marital and citizen status, and other characteristics as protected by law ('Protected Characteristics') and we respect laws protecting groups and activities everywhere we do business.
- / We do not tolerate unlawful discrimination, against anyone based on any of these Protected Characteristics or otherwise and these principles extend to all employment decisions including opportunities, recruiting, training, evaluation, promotion and reward.
- / We use reasonable efforts to ensure that technologies used by Archroma avoid perpetuating biases or increasing existing inequalities, avoiding algorithmic discrimination on the basis of race, ethnicity, belief, religion, gender or any other reason.

2.1.2 Fostering a respectful workplace and preventing harassment

We must always treat everyone fairly and with respect, fostering a productive and inclusive work environment. We never engage in harassment (sexual or otherwise) or any other unprofessional behavior. Bullying at Archroma is not tolerated: this includes both threats and acts of violence, as well as intimidation, use of abusive language, or attempts to instill fear in others.

If you believe you have experienced or witnessed discrimination, harassment or bullying at Archroma, speak up.

2.1.3 Protecting Personal Information

Our colleagues and business contacts around the world regularly entrust us with their personal information. It is vital that we protect this personal data. Doing so helps us retain the trust of our employees and partners and maintain our relationships and our reputation. Many jurisdictions also require us to take concrete steps to safeguard personal information.

We apply the principles of lawfulness, fairness, transparency, proportionality, purpose limitation, minimization, accuracy, integrity, confidentiality and accountability in the processing of any personal data of persons with whom we interact.

We have appointed a Global Data Protection Officer (DPO) to monitor internal compliance, to inform and to advise on data privacy protection obligations and assessments and to act as a contact point for data subjects and the Authorities.

What does this mean for me?

Situation: A person in my department repeatedly refuses to provide me with information that is essential to my job. He/she calls me derogatory names and tells our colleagues that I'm not qualified to do my job. His/her actions are hurtful, but I don't want to anger him/her or create more trouble for myself.

Question: How should I handle the situation?

Answer: Harassment and intimidation can take many forms. Name-calling is unacceptable. While it may not be illegal to refuse to provide information or to tell others someone isn't qualified, it is disrespectful and undermines trust. Remember that you will not face retaliation for making a good-faith report. You should immediately discuss this person's behavior with your manager. You may also contact our Whistleblowing Hotline or contact the Archroma Compliance Team.

WHAT WE DO:

We protect personal information when we:

- / Comply with Archroma's policies regarding data including personal data.
- / Promote minimum or proportionate access to personal information necessary for a limited and lawful purpose: personal information should only be known and managed by those functions to the extent they need to know based on their role and responsibilities.
- / Don't share personal data with colleagues or third parties unless with prior validation from the global DPO (or local DPO as applicable) and subject to appropriate contractual terms as applicable.
- / Speak to the global DPO (or local DPO, as applicable), or a member of the Legal Department in case of questions about what qualifies as personal information or the right way to handle any personal information.

2.1.4 Personal Data Breach**What is personal data?**

Personal data refers to any information that either alone or in combination, identifies or can identify an individual: this can include the name, passport number, e-mail address, fingerprint, biological material, picture or video of a person, or other similar information. Note that confidential information is not the same as personal information.

A personal data breach is a breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data. Each personal data breach will vary in impact and risk depending on many factors, including the jurisdiction of the affected individuals. Breaches can be internal (within Archroma) or external (outside of Archroma). Both internal and external breaches need to be reported immediately so Archroma can appropriately investigate, log and timely report as required.

If you discover or you are notified of a potential or known internal or external breach of personal data, you should immediately report it to the IT Service Desk ITServiceDesk@Archroma.com - particularly in case of an electronic breach- and to the DPO at the following email address: dpo@archroma.com.

EXAMPLES OF PERSONAL DATA BREACHES

- / Human error: For example an email being sent to the incorrect recipient or records being deleted accidentally.
- / 'Blagging' whereby an individual obtains personal data by deception.
- / Loss or theft of a physical file or electronic device.
- / A ransomware attack whereby access to systems or records containing data is disabled or encrypted.
- / A cybersecurity attack whereby personal data are accessed, altered, deleted and/or disclosed by the attacker.
- / Water leaks damaging records.
- / Flooding/break-ins of storage areas containing records.

2.2 PROTECTION OF COMPANY ASSETS

By working for Archroma, we have the responsibility and legal duty to protect all physical assets, intellectual property and financial assets of Archroma. We must safeguard them from theft, loss, misuse and waste and limit personal use of company assets.

2.2.1 Protecting Archroma's Physical Assets

We need Archroma's physical assets to meet our day-to-day responsibilities. Assets include: equipment, materials, vehicles, technology tools (computers, software, mobiles, wireless devices, tablets, servers, databases, email systems, voice messaging systems, remote access tools, internet connectivity and any device that stores or connects to Archroma data), office supplies and facilities, and company funds.

These assets have been accumulated through the hard work of people spanning the globe. We are all responsible for these assets. We must protect them and use them with integrity. We never put our physical property at risk of loss, waste or otherwise wrongful use.

2.2.2 Misappropriation

Misappropriation is dishonest, unfair or improper taking of something that belongs to another for one's own use. We never misappropriate Archroma's physical property or allow anyone else to do so. Do not use Archroma's resources, including property, information, or time, to do work which is not for Archroma or for personal gain.

Speak up if you become aware of any misappropriation in your workplace.

2.2.3 Protecting Confidential Information and Intellectual Property

Like the Company's physical assets, our confidential and proprietary information and our intellectual property (IP) including trade secrets help us create value for our partners and customers. This information also defines what is unique about Archroma. It distinguishes us from our competitors and gives us a competitive advantage. Our hard work in pursuit of innovation has yielded this strategic knowledge.

- / We must all protect our proprietary information to ensure our value to customers well into the future.
- / Many of us have access to Archroma's confidential, proprietary information in order to perform our jobs. It is our responsibility to keep this information confidential and protected. It is also our responsibility to protect the information entrusted to us by our suppliers, customers and other business partners as carefully as we protect our own information.
- / We maintain a clean desk policy. This means we never leave sensitive business information, including papers, USB sticks and notebooks, on our desk at the end of the day. We also log off when we are away from our computer.

WHAT WE DO:

We protect our confidential information and intellectual property (IP) when we:

- / Only share confidential information and IP with others, whether inside or outside of Archroma - who have a business need to know the information and in case with third parties, subject to appropriate approval and appropriate confidentiality and non-disclosure agreements (NDA).
- / Engage with the Legal Department and our divisional IP Managers when we develop IP.
- / Never misuse or alter the Archroma name, logos or trademarks.

- / Report any misappropriation or misuse of company data or IP to the Legal Department.
- / Never discuss confidential information in public places, such as elevators, cafes and airports.
- / Never make confidential information visible in public—for example, on a laptop or tablet.
- / Keep all confidential information secure with appropriate protections, such as encryption and passwords.
- / Make sure that all confidential information (whether from Archroma, our suppliers, customers or other business partners) is used only for appropriate business purposes.
- / Speak to the Legal Department if you have questions about what is confidential information and what is not and how to manage such information or third party confidential information.

2.2.4 Understanding Confidential Information

All Archroma information not in the public domain must be treated confidentially. The same applies to third party confidential information. Confidential information can come in many forms. Examples include the following:

- / Financial information including without limitation sales figures, earnings projections.
- / Information used to create and ultimately file for patents, trademarks and copyrights.
- / Trade secrets.
- / Process and product information.
- / Manufacturing plans and capabilities.
- / Research and development plans and information.
- / Customer lists and customer or business partner information.

What does this mean for me?

Situation: : One of my new hires is from a competitor. I think she could provide us with some really useful information about our competitor's customer lists.

Question: Can I ask her for this information, as long as it's for business purposes and I don't tell anyone outside our team?

Answer: No. We never solicit non-public or confidential information about a competitor. All our new hires receive training on our Code of Conduct and commit to upholding it. Soliciting or revealing confidential information from a former employer goes against our values and may be illegal. We never put ourselves or others in a position that could lead to unlawful conduct.

- / Business plans and results.
- / Bid information.
- / Unpublished pricing or margin information, raw material and conversion costs.
- / New product plans.
- / Internal reports.

2.2.5 Third-Party Intellectual Property

We always respect the intellectual property (IP) rights of others when carrying out Archroma business. Unauthorized use or misappropriation of a third party's IP may expose you and Archroma to significant liabilities.

We should not copy or derive work from a third party's copyrighted materials for use on behalf of Archroma without prior permission. Note that material available through the Internet or without a copyright notice is not necessarily free for us to use.

We do not infringe on other company's patents or violate trademark protections.

Contact the Legal Department immediately if:

- / A question arises regarding a third party's IP rights including patents, chemistries and manufacturing processes, trademarks, copyright.
- / A third party claims that a violation of its IP rights has occurred. We never respond to any such claim without prior approval of the Legal Department.

2.3. SAFEGUARDING INFORMATION TECHNOLOGY

Digital technologies are now standard tools in business. We are all aware that electronic data is vulnerable to security risks. As such, the way we manage our information technology (IT) systems and records is increasingly important.

Archroma employees should only utilize available Archroma corporate tools (such as PC, tablets, mobile device etc.) to execute day to day work. When conducting Archroma business, do not use personal tools (such as personal PC, tablets or mobile phone), or publicly available and free IT services (unless otherwise authorized) as such might generate compliance issues, compatibility or technical issues, or increase risk exposure hindering the Archroma IT team to properly protect the Archroma environment. If available Archroma corporate tools are unknown or insufficient, a request should be placed to engage the IT team to find a solution that will enable or fulfill the business need. Archroma employees should not subscribe to or develop a technology solution or engage a technology solution service provider without prior consultation, involvement, advice and approval of the Archroma IT team and subject to appropriate contractual terms.

Archroma provides yearly training on IT security to all employees and performs monthly testing campaigns to avoid the most common phishing techniques used by attackers. Commitment to and understanding Archroma IT security is every employee's responsibility. It is key to minimize the risk and vulnerability to cyberattacks.

It is of paramount importance that without prior approval of IT department, the employees do not use Archroma information on any publicly available tool (free or paid) including artificial intelligence- and machine learning ('AI') tools available in the market such as ChatGPT and similar tools unless authorized.

The Archroma IT team will adjust, adapt and communicate via corporate channels, guidelines and policies on the possible usage of AI by Archroma employees. Archroma employees should read, understand and comply with Archroma IT policies published on DMS. If in doubt, please engage the Archroma IT service desk (itservicedesk@archroma.com) for guidance.

2.3.1 Communications Systems

Our IT systems allow us to communicate and collaborate as we pursue our business goals.

- / We never use these systems in violation of the law or to engage in prohibited conduct, such as communicating or viewing discriminatory, harassing, sexually explicit or otherwise offensive or inappropriate material.
- / We take proper precautions to protect confidential information and prevent its accidental disclosure. Make sure you follow the law and Archroma's policies, security measures and internal control procedures for your computer systems and devices.

- / We should avoid as much as possible the use of external storage devices such as flash drives and USB drives to hold or share Archroma information. We should avoid holding Archroma information solely on our corporate PC hard drives nor should we transfer Archroma information to any personal devices (including PC, tablets, mobiles).
- / Our communications' infrastructure carries and houses sensitive business information and is critical to our business operations. Archroma IT may monitor and disclose your use of any Archroma devices and IT systems for security and performance reasons in accordance with applicable laws. Accordingly you should have no expectation of privacy when using Archroma electronic resources.

WHAT WE DO:

We safeguard our information technology when we:

- / Compose all electronic messages (emails, chats, text messages, posts, etc.) with the same care we apply to the creation of all Archroma documents.
- / Understand that all electronic messages are stored and recoverable and must be free of offensive or hostile content.
- / Always keep all computer and IT equipment safe and secure.
- / Ensure that all software used on our assets is approved by the IT department and that we never install private software on Archroma systems without authorization.
- / Never misuse, copy or steal Archroma's software or other IT infrastructure.
- / Ensure that only authorized personnel have access to computer and IT systems.
- / Protect our user ID's and passwords and change them regularly.
- / Never open suspicious links in emails or on the Web and conduct all IT training on a timely basis.
- / Report any actual or suspected breaches in IT security immediately to your line manager and the Archroma IT service desk (itservicedesk@archroma.com).

What does this mean for me?

Situation: I normally use AI tools like ChatGPT for personal reasons and it helps me a lot. I also prefer WhatsApp to communicate with my team and customers.

Question: Since these are very popular tools and I already know how to use it for my private matters, can I use these for Archroma activities?

Answer: No. Archroma's Instant Messaging tool is MS Teams and should be used for any business communication. You can engage with customers and vendors in a safe manner using MS Teams. ChatGPT or similar AI/ML tools available for free are not safe to be used, to upload or share Archroma's business information, since you will not be able to control the use of the information you upload when using such services. Please engage Archroma IT if you have a business need for such tools.

2.3.2 Handling Public Inquiries

A misquote or a comment taken out of context could have severe consequences for the Company. Any inquiry from a member of the press, investor or other key public contact—whether by phone, email, social media or even as an informal in-person request—must be directed to the Global Communications Team (archromagroupcomms@archroma.com) to handle.

2.3.3 Using Social Media

Social media continues to change the way we work, communicate and interact internally with our colleagues and externally with our customers, vendors and communities. We must ensure that how we use social media reflects our values and preserves Archroma's integrity and reputation. We must also be consistent and speak to the public with one voice.

Only designated spokespersons are permitted to communicate on behalf of Archroma including via social media.

Public inquiries including via social media must always be directed to the Global or regional Communications team (archromagroupcomms@archroma.com) to handle.

WHAT WE DO:

When using social media, we:

- / Ensure that social media posts about Archroma preserve or enhance our reputation.
- / Ensure that our conduct on social media matches our conduct at work.
- / Never share confidential or proprietary information of Archroma or its business partners.
- / Never make discriminatory, offensive or hostile remarks online.

You may at times want to use your personal social media to post about Archroma. In addition to the above, keep these **Do and Do not** in mind:

WHAT YOU DO:

- / Make it clear that although you are an Archroma employee, your views are your own.

WHAT YOU DO NOT DO

- / Speak on behalf of Archroma on social media.
- / Use an Archroma email address.
- / Share sensitive company information (financial, operational or legal in nature), as well as information about business with customers (not even their names) without written permission.
- / Conduct business online. Go offline as soon as there is an actual contact, enquiry, etc.
- / Engage online with negative questions or comments. Go offline if you need to and seek advice from your manager or Communications in case of doubt.
- / Post dishonorable content such as racial, ethnic, sexual, religious and physical disability slurs.

3. INTEGRITY/HONESTY

3.1 ANTI-CORRUPTION, ANTI-BRIBERY AND KICKBACKS

We earn business on our merits and with integrity. We never seek to influence business decisions through inappropriate payments or favors. Anti-corruption laws carry potential criminal penalties—both for the Company and for you—and even the appearance of corruption can harm our reputation. We strictly prohibit all forms of corruption and any business conduct that could create the appearance of improper influence.



3.1.1 Bribes, Kickbacks and Facilitating Payments

Archroma complies with the US Foreign Corrupt Practices Act, the UK Bribery Act and any local anti-corruption laws that apply to us.

We or our intermediaries must NOT accept, provide, offer, promise, give anything of value to a business partner or government official including bribes, kickbacks, or facilitation payments:

- / A **“bribe”** is illegal: a bribe is an offer or promise - either direct or indirect- to give or accept something of value with the intent to improperly influence a business decision or to obtain an improper benefit or advantage. Bribes can come in many forms including favors, gifts, charitable or political contributions, offers to hire a government official’s relative, even discounts not available to others etc.
- / A **“kickback”** is illegal: a kickback is a type of bribe where someone receives or is promised a hidden payment or benefit for making a decision (such as awarding a contract) or as a reward for fostering certain business arrangements. Generally, kickbacks are solicited by the buyer’s employees whereas bribes are generally offered by the seller or those seeking to gain an unfair advantage.
- / **“Facilitation payments”** are prohibited at Archroma: facilitation payments, sometimes called “grease payments,” are payments to speed up transactions that don’t involve business decisions — for example, paying a government official to expedite a permit or other service, or paying for police protection. At Archroma it is prohibited to make “facilitation payments” anywhere we do business, even if they are acceptable under local law or custom.
- / **“Intermediaries”**, i.e., third parties acting on behalf of Archroma include consultants, sales agents, customs brokers and joint-venture partners. We cannot hire them to do something we are not allowed to do ourselves. Nor can we simply turn a blind eye to evidence of their misconduct. It is of critical importance that all Archroma Intermediaries are selected and engaged carefully as per Archroma applicable policies.
- / A **government official** can be anyone acting on behalf of a government, employees of a public agency, international institution (such as the United Nations etc.) or a state/government-owned or state/government-controlled business (such as public universities, hospitals, utility companies, transportation authorities etc.), a political party official or candidate for political office, or members of royal families. In some countries, it may be unclear whether a person is a government official or not. This is important because we do not give ANYTHING, regardless of value, to a person who may be a government official without the prior approval of the Archroma Compliance Team.

WHAT WE DO:

We prevent bribery and corruption when we:

- / Seek guidance from the Archroma Compliance Team or the Legal Department in case of questions regarding what qualifies as bribes, kickbacks, facilitation or suspicious payments, an intermediary or a government official.
- / Immediately report any actual or suspected bribes, kickbacks, facilitation payments or other improper or suspicious payments or any request thereto to the Archroma Compliance Team.
- / Never offer anything of value with the intent to influence business decisions of business partners or government officials.
- / Be extra careful when doing business with a government official and never offer anything of any value to a government official without prior approval of the Archroma Compliance Team.
- / Never offer or accept bribes, kickbacks, facilitation payments or other improper or suspicious payments even if moderate in value and even when this is a common business practice in your location.
- / Keep complete and accurate records, with all payments detailed truthfully.
- / Never use a third party to make payments we would not make ourselves.
- / Perform prior due diligence on any third party before engaging in Archroma business in order to ensure we only do business with business partners that share our values.

What does this mean for me?

Situation: The Archroma facility where I work requires specific permission by a public authority. After waiting for the documents for several months, I was approached by a consultant offering to accelerate the process. The consultant used to be a member of the local parliament and claims to have excellent contacts in the public administration. He wants an upfront retainer and a lump-sum success fee once the permission has been granted.

Question: Should I hire the consultant?

Answer: Archroma can be held accountable for improper acts of third-party intermediaries, even if it did not know about or authorize their improper behavior. Consultants must be carefully selected, and particular caution is required if they interact with public authorities. Payments must be commensurate to the services actually rendered; in most cases, retainers and success fees will not meet these standards.

You should decline the consultant's offer and seek legitimate ways to speed up the process, such as legal proceedings.

3.1.2 Gifts and Hospitality

Archroma acknowledges that the exchange of gifts and entertainment can promote good business relationships and goodwill. However, we do not offer or accept gifts and entertainment or other business courtesies that could create the appearance of improper influence.

WHAT WE DO:

To avoid even the appearance of improper relations with third parties, we should be very careful and adhere to the following principles:

- / Never give or receive advantages while engaged in business negotiations, tender processes and the like with third parties.
- / The value of any gift or entertainment must not raise any question of an obligation on the part of the recipient. It is best to provide business courtesies infrequently and, when you do, to keep their value moderate. This value must not exceed the equivalent of USD 100. Cash gifts are prohibited. Any exception must be pre-approved by your line manager and the Archroma Compliance Team.
- / Do not offer or give anything of value to government officials to influence official action or to secure an improper advantage. This not only includes traditional gifts, but also things like meals, travel, political or charitable contributions and job offers for government officials' relatives. Never give gifts to thank government officials for doing their jobs.
- / Do not request or solicit gifts or entertainment from anybody.
- / If in doubt about the appropriateness of gifts, entertainment or other business courtesies, consult your line manager and abide by his or her decision.

3.2 MARKETING OUR PRODUCTS

We market the products we make and the services we provide honestly, and with pride and transparency, because we know this builds confidence in Archroma. Providing high-quality products and services is how we win business in the marketplace and maintain our reputation.

We never mislead customers and business partners about our products or services. We build trust through clarity and honesty. Because we value the relationships we build, we view all interactions with customers and business partners as opportunities to advance Archroma.

WHAT WE DO:

We market our products honestly and effectively when we:

- / Never misrepresent the capabilities of our products and services.
- / Highlight the value of our products and services without disparaging competitors.
- / Estimate and communicate implementation timelines accurately.
- / Ensure our marketing and advertising materials are accurate and in compliance with all laws and regulations.

What does this mean for me?

Situation: I work in the sales department, and I'm close to meeting my quarterly goal and earning an individual performance bonus. Recently, negotiations with a potential customer have become difficult. To close the sale, I suggested a very short delivery timeframe. I wasn't entirely sure this would be possible, but I thought that the client wouldn't mind because the contract will not state that the earlier deadline is necessary. The deal hasn't closed yet, but I'm worried I may have misled the client.

Question: Am I doing the right thing?

Answer: If you are ever unsure about whether a commitment can be met, you must consult with a supervisor. Setting terms that Archroma can realistically achieve is consistent with the Archroma Code of Conduct and our values of integrity and excellence. We do not allow desired performance goals or quotas to compromise our ethical standards. Consult with a supervisor and communicate honestly with the potential customer if necessary. Clarify expectations early to avoid disappointing a customer and potentially harming our reputation.

3.3 FAIR COMPETITION

We compete vigorously and fairly in the marketplace, in compliance with all applicable laws. We never compromise our ethical standards to gain a competitive advantage or to meet a business objective. No amount of profit is worth sacrificing our values.

Most countries have laws that promote free and fair competition. Known as “anti-trust”, “competition”, or “unfair competition” laws, they aim to encourage and to protect competition by prohibiting agreements, practices and behaviors that decrease business efficiency, restrict innovation or cause higher prices or lower quality of goods and services. Failure to identify and address risks associated with competition law may have severe legal, financial and reputational repercussions.

Certain conduct is absolutely prohibited under these laws and could result in your imprisonment, not to mention severe penalties for Archroma. Generally speaking, these laws prohibit:

- / Arrangements with competitors that restrain trade in some way.
- / Abuse of intellectual property rights.
- / Use of market power to unfairly disadvantage competitors.
- / Setting prices with competitors or agreeing to rig bids, to allocate customers or markets to different competitors, or to boycott a supplier or customer.

Other activities can also be illegal or unfair or create the appearance of impropriety. Such activities include:

- / Sharing competitively sensitive information (like prices, volumes, costs, market distribution, capacity, strategy etc.) among competitors.
- / Entering into a business arrangement or pursuing a strategy with the sole purpose of harming a competitor.
- / Using Archroma’s position in a certain market to gain an unfair competitive advantage.

WHAT WE DO:

We ensure fair competition when we:

- / Collect information about our competitors only from public sources, or other appropriate sources, and document those sources.
- / Notify the Legal Department if we unintentionally receive a competitor's confidential or proprietary information.
- / Never use deception or make inaccurate statements to limit competitive opportunities.
- / Never recruit for the purpose of obtaining a competitor's information.
- / Never sell at below-cost prices with the sole aim to drive competitors out of the market.
- / Never discuss competitive sensitive information (such as pricing, volumes, territories, capabilities, strategy, future plans or customers) with competitors and that we take a clear stance, distance ourselves immediately from any such conversation and report such conversation immediately to the Legal Department.
- / Complete all required competition law training and always comply with applicable competition laws.
- / Seek guidance from the Legal Department in case you have questions on how applicable competition laws (which can vary from country to country) apply to your specific situation or project.
- / If you experience or witness a concern or breach of competition law, speak up and immediately report such concern or breach to the Legal Department.

What does this mean for me?

Situation: I got a call from a representative of another chemical company. He asked me for a meeting about “rationalizing” the market for a product we both supply. The “rationalizing” meeting will be held outside my home country.

Question: Would it be possible for me to attend the meeting?

Answer: No. You must immediately contact the Legal Department. Attending a “rationalizing” meeting could be extremely serious criminal conduct. Don't be fooled by coded words like “rationalizing” or a meeting location outside of your home country. Whether you are based in the EU, China, India or anywhere else in the world, having the meeting in another country will not change the result - you could still be breaking anti-trust laws applicable to Archroma.

Situation: I've been invited to a golf event by a business partner. I think that competitors might also be attending.

Question: What should I do?

Answer: You should check with the Legal Department whether any additional approvals or training are required before you attend. No matter what, you should avoid contact with competitors at the event and especially avoid informal social gatherings involving competitors (such as having lunch, drinks etc.). Plan ahead by speaking with the event organizer to ensure you will not be grouped with competitors when playing golf.

3.4 ENGAGING WITH SUPPLIERS AND THIRD PARTIES

We show great respect when communicating with suppliers and third parties. We deal honestly and openly because our business depends on partnering with those who share our high ethical standards. As a global company with complex supply chains, we build and maintain relationships with those partners who provide the best value in accordance with our values, in compliance with the law and consistent with our expectations and for our suppliers, with the Archroma Suppliers Code of Conduct. Our business partners' actions reflect on Archroma and in certain circumstances, Archroma could be held legally responsible for them.

WHAT WE DO:

We ethically engage with suppliers and third parties when we:

- / Explain to our business partners our expectations of doing business the right way and ensure they consistently meet those expectations and comply with the Archroma Suppliers' Code of Conduct.
- / Conduct due diligence on new potential business partners and existing business partners in accordance with Archroma's policies in order to ensure our business partners meet our high ethical standards.
- / Treat all business partners fairly, regardless of the business value of the relationship.
- / Base our decisions on objective criteria, such as price, service and sustainability.
- / Avoid even the appearance of a conflict of interest or any kind of favoritism.
- / Never share confidential business information, from Archroma or another company, without appropriate prior permission.

3.5 ACCURATE COMPANY RECORDS AND REPORTING

Open, honest and effective communication with our investors, customers, employees, business partners, public and governmental offices requires accurate, up to date, complete and truthful company records and reporting.

Accurate, up to date, complete and truthful records and reporting of financial and non-financial information are critical for our:

- / Credibility and reputation.
- / Compliance with legal and regulatory obligations.
- / Ability to make accurate projections and business decisions.
- / Responsibility to our employees and other stakeholders.

We must therefore be sure that all of the records we create (including purchase orders, contracts, manufacturing and laboratory data and records, time and expense reports, invoices, inventory reports, financial statements, emails) are true, fair, accurate and complete and not intentionally or unintentionally misleading.

WHAT WE DO:

We maintain business records in a compliant and ethical manner when we:

- / Ensure that every record is correct and complete, including time and expense records.
- / Report all financial transactions accurately, in a timely manner, and with the appropriate documentation.
- / Never mischaracterize our business operations or finances.
- / Never create undisclosed or unrecorded accounts.
- / Never establish unrecorded “slush” funds or take other steps to falsify Archroma’s books and records.
- / Be transparent and promptly submit records to auditors or the Archroma Compliance Team as required or requested.
- / Preserve any record subject to a legal hold for an investigation or an audit.

3.5.1 Document Management and Records Retention

Keeping accurate documents and records is vital to our business. As such, we must manage, maintain, retain and timely dispose of all documents and records, in accordance with applicable laws and Archroma’s internal controls and policies, including when a “legal hold notification” has been issued.

In case you are served a legal hold notification, please comply with such notification immediately and contact your Legal Department for further information.

What does this mean for me?

Situation: It’s the last week of the financial year and my supervisor wants to make sure my team meets its targets. She has asked me to record an unconfirmed product sale, which we know will be finalized next week, as part of this year’s accounts.

Question: I don’t see how this will hurt anyone in the Company. Can I comply?

Answer: No. Costs and revenues must be recorded in the correct time period. The sale is not yet complete. It would be a misrepresentation and could amount to fraud to include it in an earlier period. You should speak up and report this incident (as it pertains to your supervisor, directly) to the Archroma Compliance Team.

3.6. CONFLICTS OF INTEREST

Our reputation as a company depends heavily on the independence of our decision-making processes and the integrity of our employees.

We make impartial decisions and act in Archroma's best interests when doing our work. A conflict of interest occurs when your personal interests or relationships interfere or may reasonably be perceived to interfere with or influence your ability to make objective business decisions. Such conflicts can also impair your ability to work effectively on Archroma's behalf.

WHAT WE DO:

We avoid conflicts of interest when we:

- / Ask ourselves whether the action we are considering could create a personal advantage that interferes with the interests of Archroma: if the answer is yes, we should avoid the action and inform our line manager or the Archroma Compliance Team.
- / Promptly disclose to our line manager or the Archroma Compliance Team any potential or actual conflict of interest in connection with the execution of our professional duties.
- / Never use our business information in a way that creates a conflict between our personal interests and Archroma's interests.
- / Promptly disclose any financial interest or investment we have in an Archroma competitor, supplier, customer or any entity that may, or be reasonably perceived to influence our objective decision-making.
- / Avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our daily business on behalf of Archroma.
- / Obtain prior approval from Human Resources before accepting a position as a director or officer of any outside organization.

Common areas where conflict of interests may arise include:

- / Having a family member, significant other, close friend or a person with whom you are financially involved, as a third-party doing business with Archroma.
- / Being in a romantic relationship with another Archroma employee.
- / Working at Archroma with an undisclosed family member, significant other or close friend.
- / Taking an outside job, especially one with an Archroma business partner or competitor or starting a business that does business with or competes with Archroma.
- / Serving in any capacity (including without limitation, as an officer, partner or significant shareholder, board member or advisor, consultant or manager) with any organization doing business or seeking to do business with or competing with Archroma.
- / Owning a significant financial interest in another company with which Archroma does business, seeks to do business with or competes with.

If you have questions about any possible or actual conflict of interest situation or what qualifies as a possible or actual conflict of interest, please speak to your line manager, the Legal Department or the Archroma Compliance team for guidance. Disclosing conflict of interests as soon as possible helps us maintain our culture of integrity.

What does this mean for me?

Question: My husband works for one of our customers but does not make decisions on purchasing. Is it a conflict of interest for me to sell Archroma products to that customer?

Answer: Yes, potentially. We must be careful to avoid even the appearance of a conflict. You must disclose the existence of a possible conflict to your manager. If that conflict cannot be resolved, Archroma must take steps to document and manage the conflict appropriately.

4. RESPONSIBILITY

Archroma strives to be a trusted corporate citizen and to contribute to the communities in which we operate. We comply with national and international laws and regulations as part of our responsibility as a global corporation.

4.1 SAFETY, HEALTH AND ENVIRONMENT (SHE) COMMITMENTS

Archroma's purpose is to lead our industry towards a more sustainable future for our customers and markets. We apply science to create, manufacture and sell innovative market-leading solutions that enrich lives and help create a sustainable future. We can prevent harm through excellent safety, health and environment (SHE) performance across all aspects of our business. This makes us competitive in the present as well as sustainable into the future.

WHAT WE DO:

We achieve excellence in sustainable SHE performance when we:

- / Commit to safe operations and practices.
- / Assess risks and hazards related to our processes and products.
- / Communicate to business partners and customers how best to use, transport, store, recycle, and dispose of our products.
- / Train our people on and follow Archroma policies and country specific SHE- and sustainability laws that govern our business.
- / Register all substances and products as per legal requirements.
- / Report safety issues, concerns or breaches of Archroma policies, procedures, processes, work instructions and applicable SHE laws promptly to your supervisor and SHE manager.

4.1.1 Maintaining a Safe Workplace

We all have a duty to care for the health and safety of ourselves and those around us.

- / We must adhere to Archroma's Life Saving Rules, follow relevant regulations and work instructions, and use the protective equipment required by law or Archroma policies. We never take unnecessary risks on the job.
- / As part of our commitment to health and safety, we must never tolerate any acts or threats of violence in our workplace or on social media, and we must report them.
- / To keep our work environment free from violence or intimidation, we may not bring any weapons or firearms onto Archroma premises, including parking facilities, unless otherwise allowed by applicable local laws.
- / Call your local emergency responders and/or law enforcement if danger is imminent.

4.1.2 Incidents and Near Misses

We take all incidents and near misses very seriously. We all have a responsibility and an obligation to report them, whether we were involved in the event or just witnessed it.

Identifying and understanding these incidents allows us to prevent them from happening again, and that reduces risk for us all. Reporting incidents and near misses is in line with both our values and applicable laws.

4.1.3 Alcohol and Drug Use

We are never allowed to work under the influence of drugs, alcohol or any other substance that may impair our ability to work safely. The possession, use, sale, purchase or distribution of any illegal drugs, paraphernalia or controlled substances by any employee working from home, at any Archroma's site or premises, in company cars, is prohibited. This includes during company paid transportation and work trips.



NO drugs while working.
NO alcohol at work.
NO smoking outside designated areas.

- / Alcohol during social/business events (at Archroma premises) only with management's approval.
- / Always inform your supervisor or the person in charge if you are taking medicines that may hinder your ability to work safely.

4.2 ANTI- MONEY LAUNDERING REGULATIONS

Archroma complies with all relevant national and international laws and regulations covering anti-money laundering and anti-terrorism laws.

Archroma is committed to the international fight against money laundering and the financing of terrorism. Money laundering involves processing illicit funds, so they look legitimate.

- / It is our objective to conduct business with reputable business partners who are involved in lawful business activities and whose funds are derived from proven legitimate sources.
- / We must abide by applicable anti-money laundering laws and internal procedures - including due diligence - designed to identify the third parties we do business with and to detect and deter suspicious forms of payment or customers or other transactions that could involve money laundering or terrorist financing.
- / We must keep accurate books and records of all business transactions and follow requirements for reporting cash transactions.
- / You must be vigilant, speak up and report to the Archroma Compliance Team or the Legal department any irregularities in payments and any suspicious activity.
- / Some red flags include payments in a currency other than established in the invoice or contract, payments from other countries or intermediaries not related to the transaction, payments in cash, or unusual business behavior, structures or conditions applied to the deal etc.

4.3. COMPLYING WITH INTERNATIONAL TRADE COMPLIANCE LAWS

As a global company, we respect all applicable international and national laws. Our ability to maintain and grow our business depends on it. International trade compliance laws are complex and vary from location to location: this includes laws regulating imports and customs activities, export and export controls, trade embargoes and economic sanctions and anti-boycott.

We are responsible for knowing and following these laws everywhere we do business. By doing so, we protect Archroma from penalties and make the world a safer place to do business.

What does this mean for me?

Situation: A customer has asked me to pay an order from multiple accounts and to use a combination of multiple payment types (e.g. cash and check).

Question: What should I do?

Answer: This is a very suspicious money laundering behavior. You should promptly consult your line manager or the Legal Department. You should only take further steps in the transaction, including accepting payment from the counterparty, after the Legal Department has advised you how to proceed. This approach enables Archroma to take appropriate legal steps in a timely fashion.

WHAT WE DO:

We comply with international trade compliance laws when we:

- / Never recruit, market or distribute across international borders without first knowing the applicable laws.
- / Never do business with companies or individuals on sanctions' lists.
- / Assess risk and conduct due diligence on third parties with whom we plan to do business.
- / Contact the Archroma Compliance Team with any concerns or questions regarding international trade compliance laws, or if any customers or business partners ask, directly or indirectly to participate in a boycott.
- / Comply with all restrictions regarding access to customer information.
- / Comply with local laws over Archroma policies in case there is a conflict between local laws and Archroma policies.

4.3.1 Imports and Exports

The global nature of our business means that we must understand and comply with the laws and regulations that govern the export, re-export, import or transfer of material, products, information or technology:

- / An export is a product or service that is shipped to a person in another country. Before undertaking any export transactions, we must determine whether the item is eligible for export. This depends upon the nature of the item, the country of destination, and the designated end use and end user. We must obtain all required licenses and permits and pay all relevant duties or tariffs.
- / An export can also be technology, technical information or software provided to a non-citizen, regardless of where in the world that individual is located. The release may be through such channels as oral discussion, email, training, data storage device and database access. Some countries, such as the U.S., consider the release of controlled technical information to non-citizens within their country as deemed export. When in doubt about whether an export restriction applies, seek guidance from the Archroma Compliance Team.
- / We import when we bring goods or technologies into a country from another country. Imports are also subject to various laws and regulations. We may need to pay duties or tariffs, or obtain prior approval from a controlling agency.

4.3.2 Trade embargoes, economic sanctions and boycotts

Trade embargoes and economic sanctions prohibit some or all business activities with certain countries and their nationals or with specific individuals or entities.

A boycott is when one person, group or country refuses to do business with certain other people or countries. Some countries attempt to impose boycott requirements on companies operating within their borders.

- / We must never participate in any trade activity that violates these laws, nor may we ask third parties to do so on our behalf.
- / Seek guidance of the Archroma Compliance Team in case you are not sure if trade embargoes or economic sanctions apply.
- / We must be alert to boycott requests and promptly raise all such requests to the Archroma Compliance Team for guidance on further handling including possible reporting.

4.4 CORPORATE CITIZENSHIP AND COMMUNITY ENGAGEMENT

Archroma contributes through investment and engagement and we are committed to building sustainable relationships based on mutual respect and trust with all our stakeholders.

We demonstrate respect for people and the planet and ask all our employees to consider the short- and long-term impacts to the community and the environment when they make business decisions. Participation in charitable and community activities is entirely voluntary but commitment of Archroma's funds, employees and assets is subject to the approval of the relevant manager pursuant to Archroma's Delegation of Authority (DOA).

4.4.1 Political and lobbying activities

Each of us is free to have our own political beliefs as citizens. We may be personally involved in politics during our personal time and make political contributions within legal limits. However, we may never make political donations or contributions using Archroma's name, time, funds or other resources. Political contributions are subject to complex rules and regulations, and we are to avoid any personal involvement that might suggest approval or endorsement by Archroma. Any use of Archroma's resources or facilities, or any activities during working hours on behalf of any campaign, requires prior approval by the Archroma Compliance Team.

Lobbying activities are highly regulated in some countries. At Archroma lobbying is subject to prior approval and guidance of the Archroma Compliance Team and the Legal Department.

4.5 RESPECTING HUMAN RIGHTS

We respect the human rights of individuals and communities around the world. We work to ensure those rights wherever we do business, and we expect the same from our business partners. Slavery, human trafficking and child labor have no place in our business or in global society. We support the dignity and equality of all human beings, and we are responsible for upholding the rights of all.

WHAT WE DO:

We respect human rights when we:

- / Provide reasonable working hours and fair wages for all who work on our behalf.
- / Ensure all our business partners are committed to fair labor practices.
- / We do not tolerate modern slavery, nor do we ever use or work with Suppliers who use child or forced labor anywhere in the world.
- / We report violations of human rights if we become aware of them.

4.6 INSIDER DEALING AND OTHER CAPITAL MARKET LAWS

Archroma is committed to ensuring capital market compliance and that information learned on the job must never be used for improper personal gain.

Insider dealing laws: by working on behalf of Archroma, we may have exposure to information relating to publicly listed companies. To use material non-public information to buy or sell stock, or to pass it along to others so that they may do so, could constitute insider trading. Insider trading not only violates this Code, it violates the law. Don't do it.

Information is considered "material" if a reasonable investor would consider the information important in deciding whether to buy, sell or hold a stock or other security. "Non-public" information refers to information that has not yet been disclosed to or absorbed by the public. Material, non-public information generally includes information such as:

What does this mean for me?

Question: A heavy equipment supplier made a confidential approach to you about a new machinery they plan to introduce to the market. You decided that Archroma couldn't use the product, but you think it will be a real breakthrough for other industries. Once the supplier finds a market, you imagine its share price will rocket. Are you allowed to buy securities of the supplier?

Answer: No. You are not allowed to buy any securities of the supplier until the public knows about the new product. This is "non-public" information because the introduction was confidential. There has not been a full and fair public disclosure yet. The information is "material" because a reasonable investor would probably consider the information important in making an investment decision about the company.

- / Unreleased sales figures.
- / Pending mergers or acquisitions.
- / Earnings' estimates.
- / Introduction of a new product or service.

Other capital market laws: in addition to insider trading laws, we may also be exposed to other capital market provisions, such as directors' dealings' rules, ad hoc publicity or the disclosure of certain shareholding thresholds. You are asked to be very careful once you have contact with publicly listed companies, be it in - or outside of Archroma. Speak to your line manager or the Legal Department if you have any questions.

Final Statement

Thank you, everyone, for all you do every day to adhere to this Code of Conduct! Your dedication to acting with integrity at all times is the foundation on which our success is built. Each of us must live up to the high ethical standards in this Code so that we make the right decisions, foster trust with each other and with our customers and stakeholders.

When in any doubt about how to act or what to do in any situation, please speak up. The consequences of non-compliance are serious and could include fines or penalties for the company, as well as termination and prosecution for individuals. Abiding by applicable laws and acting with integrity is the only acceptable way at Archroma. It is how we prosper, protect ourselves, our fellow colleagues and our Company.