

SUPPLIERS CODE OF CONDUCT / Setting an industry standard



While vendors are independent entities from Archroma, the business practices and actions of a vendor, when conducting business with or on behalf of Archroma, may significantly impact and reflect upon our Company. Because of this, Archroma expects all vendors and their employees, agents, and subcontractors ("Representatives") to follow our high ethical standards set forth in the Code of Conduct, while they are conducting business with us or on our behalf. It is the responsibility of our vendors and Representatives to understand and adhere to Archroma's expectations. Vendors should notify a member of Archroma management if and when any situation develops that causes the vendor or Representatives to operate in a way that may be in conflict with Archroma's expectations. Archroma may request the removal of any vendor or Representatives who behaves in a manner that we consider to be acting inconsistent with the Code of Conduct or any Archroma policy.

Archroma has established conduct standards for its business related practices that are set out in our Archroma Code of Ethics and Conduct. This Archroma Code of Ethics and Conduct ("Code of Conduct") reflect our commitment to our values of honesty, integrity, respect, and responsibility. Archroma expects that its vendors will share and embrace these values as well as our commitment to regulatory compliance.

Expected Conduct of Vendors and Representatives

While conducting business with or on behalf of Archroma, all vendors and Representatives are expected to conduct their business interactions and activities with integrity and in compliance with the applicable laws and regulations of their respective countries. Archroma commits to maintaining ethical and sustainable operations and business development in all activities according to its own Code of Conduct and Responsible Care® principles. Archroma expects its vendors and Representatives to share its commitment to human rights and equal opportunity in the workplace. In addition to the obligations under the vendor's agreement with Archroma, all vendors and Representatives are required to follow our ethical standards, which include expected conduct in the areas of regulatory compliance, business practices, and employment. A summary of these expectations is noted in this document.

I. Expected Regulatory Compliance Practices

Vendors and Representatives are expected to:

/ Conduct business in compliance with antitrust and fair competition laws that govern the jurisdictions in which they do business;

- / Comply with the anti-corruption and anti-money laundering laws of the countries in which they do business;
- / Not make any direct or indirect payments, proposed payments, facilitating payments, or offer something of value to another person or someone who is an employee of the government or a public agency with the intent to influence him or her;
- / Comply with all applicable environmental laws and regulations;
- / Be honest and truthful in discussions with regulatory agency Representatives and government officials;
- / Comply with all applicable trade control laws that apply to many aspects of Archroma operations;
- / Not impose improper boycott requirements on Archroma; and
- / Comply with all applicable privacy laws and regulations of the countries which may be affected.

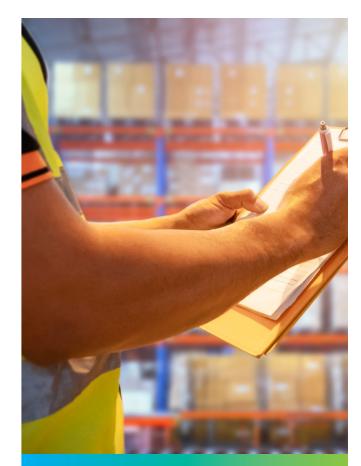


Archroma has been paving the way as an industry leader. With a commitment to ethical sourcing and supply chain transparency, Archroma's Supplier Code of Conduct sets a new standard for corporate responsibility in the chemical industry.

II. Expected Business Practices

Vendors and Representatives are expected to:

- / Honestly and accurately record and report all business information and comply with all applicable laws regarding their completion and accuracy;
- / Comply with the intellectual property ownership rights of Archroma and others including but not limited to patents, trademarks, and trade secrets and use software, hardware and content only in accordance with their associated license or terms of use;
- / Protect and responsibly use the physical and intellectual property of Archroma;
- / Use such assets only when authorized by Archroma to do so;
- / Use Archroma-provided information technology and systems (including e-mail) primarily for Archroma business-related purposes and in accordance with applicable Archroma policy;
- / Archroma policy prohibits vendors and Representatives from using Archroma-provided assets, technology or systems to create, access, store, print, solicit, or send any material that is harassing, discriminating, abusive, threatening violence or similarly inappropriate or unlawful;
- / Comply with Archroma requirements for maintenance of passwords, confidentiality, and security and follow its Information Technology and Privacy procedures as a condition of receiving access to Archroma's internal corporate network, systems, and buildings, as well as while performing services for Archroma;
- / Work in line with Responsible Care[®] principles and to continuously improve their sustainability efforts and their environmental footprint through reduction of consumed resources and generated waste.
- / Ensure protection of the health and safety of employees and the local neighborhoods of the sites or locations they are operating in. In case of violations, public explanations shall be issued promptly, and the effectiveness of the corrective actions shall be verified.
- / Use good judgment and moderation when offering gifts or entertainment to Archroma associates;
- / In general, vendors and Representatives should refrain from giving Archroma associates an individual gift with a greater value than \$100 USD;
- / Vendors and Representatives should never offer a bribe, kickback, or bartering arrangement for goods or services or any other incentive to an Archroma associate in order to obtain or retain Archroma business;
- / Any gifts or entertainment given or received must be in compliance with the law, and must not violate Archroma policy;
- / Avoid an actual conflict of interest or even the appearance of a conflict of interest;
- / Vendors or Representatives should not deal directly during negotiation or otherwise with any Archroma associate whose spouse or other family member or some other close relation is an employee or has a personal or financial interest in the vendor or the vendor's business;
- / Avoid insider trading by buying or selling Archroma or another company stock when in possession of information about Archroma or another company that is not available to the investing public and that could influence an investor's decision to buy or sell stock; and
- / Create, retain and dispose of business records in full compliance with all applicable legal and regulatory requirements.



Archroma not only assures its customers of high-quality products but also drives positive change within the industry.

III. Expected Employment Practices

Vendors and Representatives are expected to:

/ Cooperate with Archroma's commitment to providing a workplace free of sexual or other harassment and discrimination;

/ Provide a safe and healthy work environment and comply with all applicable safety and health laws, regulations and practices;

- / Prohibit the use, possession, distribution, and sale of illegal drugs, respect Archroma's 12 Life Saving Rules while on Archroma premises and at all times when conducting business with or on behalf of Archroma;
- / Use only voluntary labor; the use of forced labor, whether in the form of indentured labor or otherwise, is prohibited;
- / Comply with all local wage and hour and minimum working age laws and requirements; the use of modern slavery and child labor is prohibited; and
- / Maintain employee records in accordance with local and national regulations.



Our Supplier Code of Conduct serves as a testament to our ethical standards and the importance they place on responsible and sustainable business practices. By setting clear expectations for suppliers' employment practices, we ensure that integrity and respect permeate through every level of their supply chain. In a world where conscientious consumerism is gaining momentum, our commitment to ethical employment practices sets a commendable benchmark for the industry.

/ Reporting Concerns and Requesting Assistance

If a vendor or Representative has a question about a particular situation, or needs to report a problem or concern, they are encouraged to work with their primary Archroma contact in resolving a business practice or compliance concern. Archroma recognizes, however, that there may be times when this is not possible or appropriate.

In such instances, a vendor or Representative can:

- / Contact the Archroma Ethics and Group Compliance Department on compliance@archroma.com.
- / Contact Archroma's Whistleblower Channel, which can be reached at:

00 800 1777 9999, or, <u>Archroma Whistleblowing Portal</u>; or <u>www.convercent.com/report</u> and select 'Archroma'; or Scan QR Code to the Archroma page:



Reports are handled with strict Confidentiality and Anonymity by the Archroma Group's Compliance Team.

Archroma does not tolerate retaliation against another person. No one who reports any suspected legal or policy violation in good faith will be subject to retaliation for making such a report. Good faith means that the individual coming forward with all of the information believes he or she is giving a sincere, truthful, and complete report.

Cyril Wasem Chief Procurement Officer

Patrick Verraes General Counsel.

Legal, Compliance and Corporate Affairs



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