



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. 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 and partners, 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.

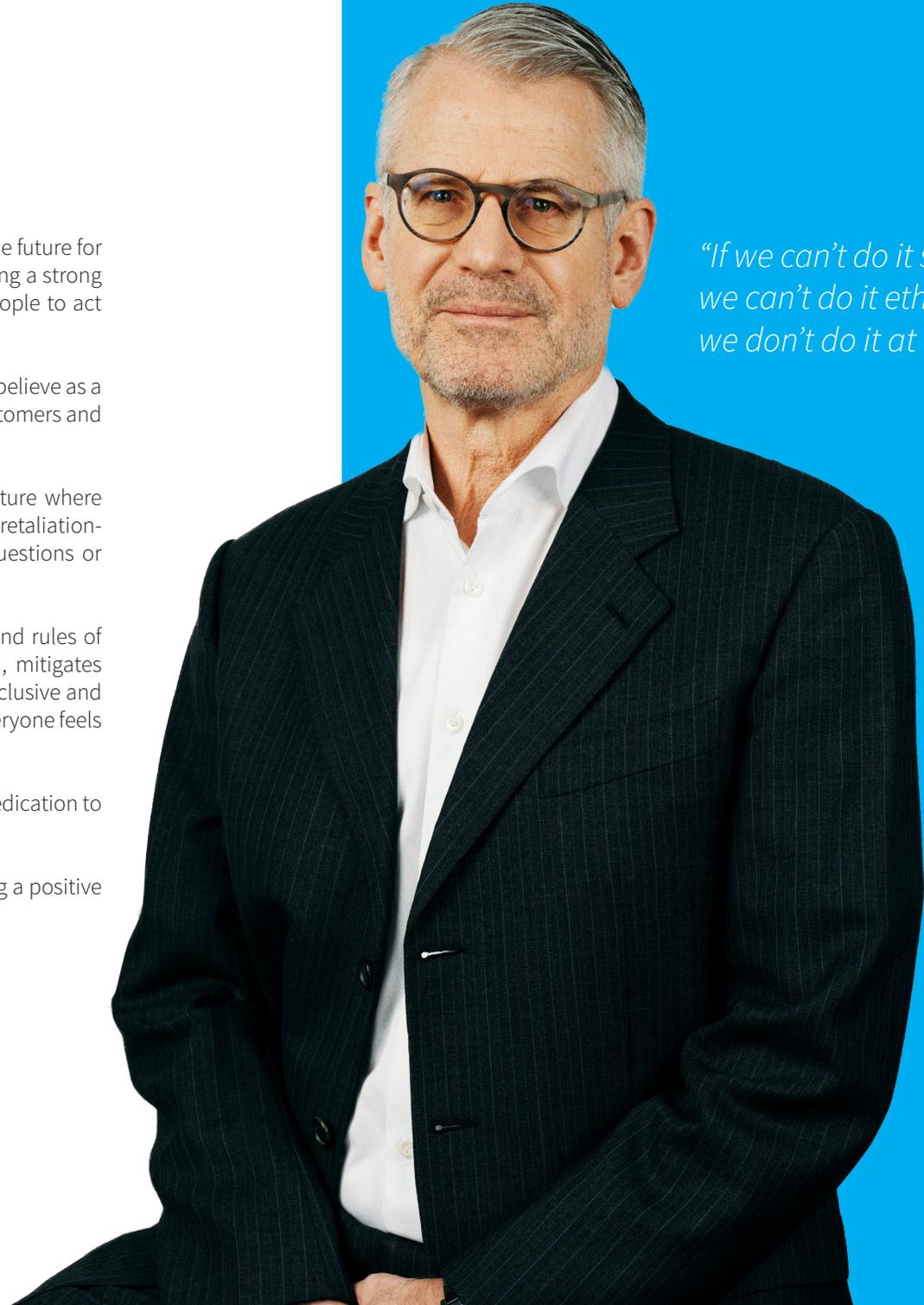
We are very proud of our level of shared commitment to the guidelines and rules of our Code of Conduct. Upholding ethical practices safeguards our brand, mitigates risks, and ensures compliance with laws and regulations. It cultivates an inclusive and respectful workplace where diversity is celebrated, ideas are valued, and everyone feels empowered to contribute their best.

Let us continue to build a culture anchored on our values, reinforcing our dedication to integrity and 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 WHAT WE DO AT ARCHROMA

At Archroma, our passion for who we are and for doing the right thing gives us a competitive advantage. Each of us must live up to the Archroma values so that we make the right decisions every day.

We are committed to our **AACC Cultural Pillars: Achieve and Exceed, Adapt and Innovate, Center on Customer and Collaborate and Embrace Diversity.** This commitment unites us globally and fosters our high ethical standards in everything we do—especially in our relationships with each other and with our customers and business partners.



1.2 AACC – OUR CULTURAL PILLARS

**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



1.3 THE PURPOSE OF OUR CODE

By reading and understanding this Code and adhering to its rules and the intent behind them, you'll be empowered to follow the Archroma way of doing business. You'll be able to identify potential issues and/or breaches that need to be reported, helping all of us conduct ourselves in a sustainable, ethical and responsible way.

- / Our Code sets out binding rules and guidelines for the employees and officers of Archroma Management LLC, and all of its subsidiaries, affiliates and joint ventures (collectively, "Archroma").
- / The Archroma Code of Conduct is the foundation on which Archroma will conduct business with its vendors and business partners which is further set out in the Archroma Supplier Code of Conduct.
- / We all know that it is impossible to spell out every possible ethical scenario we might face in our day-to-day work. Instead, we rely on our Code as a navigation guide and on one another's good judgment to uphold a high standard of integrity for ourselves and Archroma.
- / Our purpose is to achieve the highest ethical conduct, acting lawfully and professionally at all times. We must comply with all local laws and regulations—in locations where our legal entities are established and wherever we conduct business.
- / When we encounter a situation where we are unsure that we are doing the right thing, it can be helpful to ask ourselves: "What if my actions were broadcast on the local news for all of my coworkers, family and friends to see?" If this would be embarrassing, it is most likely unethical. Instead of following through with what we were considering doing, we should instead speak up to seek guidance and report any breaches or potential breaches of the Code.
- / When local customs or business practices conflict with our Code or Company policies, we must obtain prior permission from the Legal Department before conforming to them.
- / The Archroma Compliance Team should also be consulted to see if laws in different countries conflict with each other or this Code.

1.3.1 Making the Right Decisions

At times, we may be unsure of what to do, or we may not know whether an action or decision is ethical or legal. In such situations, 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?
- / What sort of guidance do I need before I can make this decision?
- / Could my actions cause Archroma to suffer any negative consequences?
- / Is there anyone at Archroma who should know about this action or decision?
- / Would I want my actions disclosed to the public? Would my family be proud of my actions?

1.3.2 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:

- / Act with the highest integrity and in full accordance with our values.
- / Communicate the importance of this Code, and of ethical conduct in general, to our direct reports.
- / Create a positive environment where our direct reports and other employees feel comfortable asking questions and raising concerns.
- / Be alert to situations that may violate this Code or the law.
- / Promptly notify the appropriate individuals of any situation that is unethical or potentially damaging to Archroma's reputation.
- / Respect confidentiality and avoid any form of retaliation.

1.4 COMPLIANCE SUPPORT AND REPORTING OF MISCONDUCT

Integrity and ethics are at the heart of all our actions. Our Code defines what integrity means for our business. But please remember, it is only a guideline; it cannot tell the whole story or answer every question. If you are in any doubt, please speak up.

1.4.1 Speaking Up

It is very important that we have a culture where ethics is openly discussed.

Reach out to your line manager, local Human Resources team, the Legal Department or the Archroma Compliance Team (compliance@archroma.com) whenever:

- / You have a question or concern about the contents of the Code or internal Company policies.
- / You have a question or concern about a specific situation.
- / You are uncertain about how to act.
- / Something just does not feel right.

If you become aware of a situation that you either suspect or know will violate our Code, other internal policies or the law, it is your **responsibility to report it** to the Archroma Compliance Team via your choice of the following channels:

The Archroma Whistleblowing Portal:

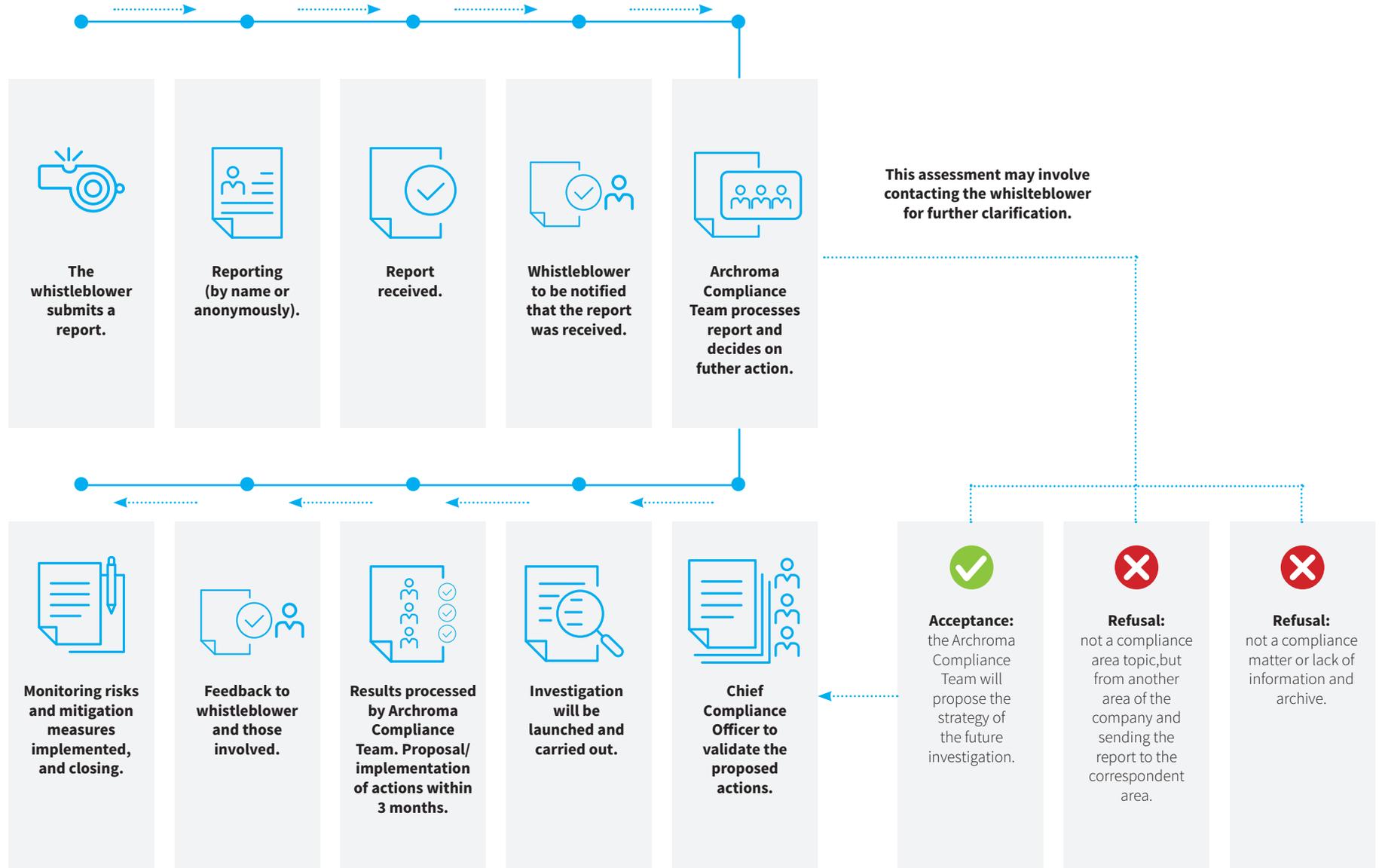
- / Call the toll-free **Hotline: 00 800 1777 9999**
- / Call your local country toll-free number ([listed on the Archroma Whistleblowing Portal](#))
- / Follow the easy instructions on the [Archroma Whistleblowing Portal](#)
 - / You may also access the Portal via the **Convercent entry page:** www.convercent.com/report and select “Archroma”
 - / Or by using this **QR Code:**
- / Send an email to the **Archroma Compliance Team:** compliance@archroma.com



The global Archroma Compliance Team investigates all potential compliance violations in a professional and transparent way, making sure that everyone involved is treated fairly and that their legal protections are upheld. This means that we always uphold **confidentiality, non-retaliation, presumption of innocence and objectivity**, among other guarantees.

1.4.2 The Flow of the Compliance Reporting System

Flow of whistleblowing system



1.4.3 Ensuring Non-Retaliation

We do not tolerate any kind of retaliation against anyone who: refuses to follow an instruction to act in a way that is inconsistent with the law, our Code, or internal policies; reports suspected irregularities in good faith; or collaborates with an investigation.

At Archroma, 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. However, to ensure that reported facts are investigated, **all anonymous reports will be processed** (except in jurisdictions where identification of reporters is or can be legally mandated).

1.4.4 When a Breach Occurs

When a breach of the Code is found to have taken place, Archroma will act quickly and fairly.

We will take all necessary disciplinary action. This could include dismissal and informing the authorities, if required. If one of our partners breaches the Code, Archroma might end the partnership and not engage them in the future.

What does this mean for me?

Situation: My supervisor has told me to do something I think isn't right. I think I should tell someone, but I'm afraid that my supervisor will make my job difficult for me if I do.

Question: What should I do?

Answer: Our Code says that if something does not feel right, you need to speak up. Your supervisor is often the best person to go to when you need to raise concerns. But because it is your supervisor's request that concerns you, contacting the global Archroma Compliance Team would be a good option.

If you make a report, we will look into the situation. We will not tolerate your supervisor or anyone else retaliating against you—either by disadvantaging or discriminating against you, or threatening to do so. That's why the right thing to do is to speak up.

2. INTEGRITY WITH EACH OTHER AS ARCHROMA EMPLOYEES

2.1 DIVERSITY, ANTI-DISCRIMINATION AND SAFE WORKPLACE

At Archroma, 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. As valued members of a global company that does business in many countries worldwide, we remember 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; when in doubt, consult with the Archroma Compliance Team .

WHAT WE DO:

With the diversity of Archroma comes unique ideas, viewpoints, talents and values that directly contribute to our worldwide success:

- / We work together with people of diverse ethnic backgrounds, cultures, religions, ages, disabilities, races, sexual identities, worldviews and genders.
- / We promote equal employment opportunities.
- / We do not tolerate discrimination, or other offensive behavior, against anyone based on any of these characteristics.
- / We support the United Nations Convention on the Rights of the Child (New York, 20 November, 1989) and do not accept child labor and/or forced labor.
- / We respect the dignity, privacy and personal rights of every individual.
- / These principles extend to all employment decisions including recruiting, training, evaluation, promotion and reward.

2.1.1 Fostering a Respectful Workplace

We treat everyone with respect. With “Collaborate and Embrace Diversity” as one of our cultural pillars, part of our formula for success is ensuring that all of us feel valued and respected. We are committed to diversity and inclusion, equal employment opportunities and a workplace free from harassment and discrimination. These commitments foster a professional and supportive work environment for all.

2.1.2 Embracing Diversity and Inclusion

We do business around the world, and we are committed to reflecting a diverse global perspective in our workplaces. We respect laws protecting groups and activities everywhere we do business.

We know that diverse talents and points of view enhance our teams and broaden our vision. When we include everyone, we make better decisions.

WHAT WE DO NOT DO:

We do not tolerate discrimination against an employee or applicant based on protected characteristics. Protected characteristics include, but are not limited to, the following:

- / Race, color or ethnicity.
- / Religion.
- / Gender or sexual orientation.
- / Age.
- / Disability.
- / National origin.

What does this mean for me?

Situation: I am searching for a candidate to hire as a sales manager for the sales department. In my opinion, sales is a “male business”, best suited to a male manager.

Question: Can I consider only male applicants for the sales manager position?

Answer: You are not permitted to search only for male applicants. Nor may you reject the applications of female applicants just because they are female; this would be discrimination on the basis of gender.

Your search must focus on the qualifications, skills and experience of the candidates and how they meet the essential functions of the position, without regard to the candidate’s gender.

2.1.3 Preventing Harassment

Archroma is committed to a work environment where everyone is treated with respect and dignity. We require our workplace to be businesslike, professional and free of harassment. Such an environment ensures that employees are able to do their best work.

WHAT WE DO:

We create a work environment free of harassment when we:

- / Avoid saying or doing anything that may be perceived as offensive.
- / Treat everyone with dignity and respect.
- / Speak up if we witness harassment or other offensive conduct.
- / Respect personal boundaries and preferences.

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 calls me derogatory names and tells our colleagues that I'm not qualified to do my job. His actions are hurtful, but I don't want to anger him 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 Portal, Hotline or contact the Archroma Compliance Team (compliance@archroma.com).

2.1.4 Protecting Private Information

Our colleagues and business contacts around the world regularly entrust us with their private 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, purpose limitation, minimization, accuracy, integrity, confidentiality and accountability in the processing of the data of all persons who interact with us.

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

WHAT WE DO:

We protect private information when we:

- / Promote as much transparency as possible so that subjects know what data is being collected and what it is being used for.
- / Ensure that technologies avoid perpetuating biases or increasing existing inequalities, avoiding algorithmic discrimination on the basis of race, ethnicity, belief, religion, gender, or any other reason.
- / Minimize intrusion into people's lives and privacy, guaranteeing proportional and necessary processing that preserve individual freedoms.
- / Implement verification, validation and accreditation mechanisms to ensure fair processing and accountability.
- / Immediately report any suspected personal data breach.
- / Promote the minimum access necessary to personal information. Private information should be only known and managed by those roles that require it as part of their responsibilities.
- / Immediately inform if you identify you have access to private information that you do not require for your role.
- / Don't share data with colleagues, third parties or external applications unless the appropriate contractual relationship is validated by DPO.

2.1.5 Personal Data Breach

What is personal data?

Personal data refers to any information relating to an identified or identifiable individual. This information does not have to be private – examples of personal data include the name, passport number, e-mail address, fingerprint, biological material, picture or video of a person.

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 Archroma). Both kinds need to be reported so Archroma can appropriately investigate, log and report as required.

If you discover or are notified about a potential or known internal or external breach of personal data, you should immediately report it to IT Service Desk (particularly if electronic) or to the Data Protection Officer at 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 SAFETY, HEALTH AND ENVIRONMENT (SHE) COMMITMENTS

We apply science to create, manufacture and sell innovative market-leading solutions that enrich lives and help create a sustainable future. We place care for people and planet at the forefront of all we do. 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.
- / Reduce at-risk behaviors and increase safe behavior.
- / 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.
- / Follow Archroma and country SHE and sustainability laws that govern our business.
- / Register all substances and products as per legal requirements.
- / Act as stewards for our products to minimize the SHE risks throughout their lifecycles.
- / Report concerns or breaches in protocol to your supervisor and SHE manager.

What does this mean for me?

Situation: I work in one of Archroma's production facilities. During my time on the job, I've had an idea about how we can reduce waste and further minimize the impact Archroma has on the environment. However, my idea involves expensive changes to Archroma's operational processes.

Question: Should I pursue my idea?

Answer: Yes. You should tell your supervisor about your concept and its environmental impact right away. Although Archroma must consider its budget, we all have a responsibility to take all reasonable efforts to conserve natural resources and protect the environment. Archroma is aware that in many situations, long-term environmental solutions will outweigh short-term costs.

2.2.1 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 local law or job responsibility.
- / Call law enforcement if danger is imminent.

2.2.2 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 the law.

2.2.3 Alcohol and Drug Use

We never report 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, during company paid transportation, on work trips, etc is prohibited.



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.

3. INTEGRITY WITH OUR CUSTOMERS AND BUSINESS PARTNERS

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

Here are some terms that it is important to understand in this area:

- / A bribe is when someone offers something of value to another person with the intent to improperly influence a business decision or obtain a benefit. Having another person or a third party offer a bribe on your behalf is the same thing as offering the bribe yourself.
- / 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 such intermediaries are selected and engaged carefully.
- / 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.
- / 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. They are often small payments. They are always unacceptable at Archroma; we do not make “facilitation payments” anywhere we do business, even if they are acceptable under local law or custom.
- / A government official can be an employee of the government or a public agency or a state-owned or state-controlled business, or a candidate for political office. 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. If any doubt about whether a person should be considered a government official, contact the Archroma Compliance Team.

WHAT WE DO:

We prevent bribery and corruption when we:

- / Never offer anything of value with the intent to influence business decisions.
- / Never offer anything of any value to a government official without prior approval of the Archroma Compliance Team.
- / Never offer or accept improper or suspicious payments.
- / Never offer or accept kickbacks, even if moderate in value.
- / Keep complete and accurate records, with all payments detailed honestly.
- / Never use a third party to make payments we would not make ourselves.
- / Perform due diligence to ensure we partner with businesses that share our values.
- / Report any concerns about improper payments.
- / Never offer a “facilitation payment,” even when this is common business practice in your location.
- / Report any request for a “facilitation payment” to the Archroma Compliance Team.

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, political pressure via the embassy, or the like.

3.1.2 Gifts and Hospitality

Archroma acknowledges that the exchange of gifts and entertainment can promote good business relationships and good will. 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 the 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.

What does this mean for me?

Situation: While negotiating prices, an Archroma supplier offered me a ticket to a football game I really want to see.

Question: Is it all right to accept the ticket?

Answer: No. Even if the value is moderate, Archroma employees are not allowed to accept gifts or entertainment from any individual or company while engaged in business negotiations, tender processes and the like.

Situation: We have a customer who is negotiating a supply contract with Archroma who is still in doubt about whether to close this contract with Archroma or with the competitor.

Question: I know the client is a big fan of football. Can I give him a pair of tickets for the Copa America final to help him with the decision?

Answer: No, not at all. We cannot give gifts or entertainment to customers with values over USD100. Even less at the stage of negotiating a contract. The decision to close a deal should be based on the quality of the product or service, customer satisfaction, and the long-term business relationship.

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 for.

Most countries have laws that promote free and fair competition. Known as “anti-trust,” “competition,” or “unfair competition” laws, they 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. 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.
- / 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.
- / 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, costs, market distribution, 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 to drive competitors out of the market.
- / Never discuss pricing, territories, capabilities, future plans or customers with competitors.
- / Complete all required competition law training.
- / Contact the Archroma Compliance Team if we are unsure about a fair competition issue.

What does this mean for me?

Situation: I got a call from a representative of another chemical company. He asked me to 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 and Archroma Compliance Teams. 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 another market, having the meeting in another country will not change the result - you could still be breaking anti-trust laws.

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 avoid contact with competitors at the event. Plan ahead by speaking with the event organizer to ensure you will not be grouped with competitors when playing golf. At the event, you should avoid informal social situations (like having lunch) with competitors. You should also check whether any additional approvals or training are required before you attend.

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 and in compliance with the law.

WHAT WE DO:

We ethically engage with suppliers and third parties when we:

- / 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 (see Section 4.3: Conflicts of Interest).
- / Never share confidential business information, from Archroma or another company, without permission.
- / Discuss issues openly and honestly when they arise to find a mutually acceptable solution.
- / Conduct due diligence to ensure our business partners meet our high ethical standards.

4. INTEGRITY WITH OUR SHAREHOLDERS

4.1 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.



4.1.1 Protecting Archroma's Physical Assets

We need Archroma's physical assets, including equipment, materials, vehicles, technology tools (computers, mobiles, and respective accessories), office supplies and facilities, to meet our day-to-day responsibilities. 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.

4.1.2 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 outside work.

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

4.1.3 Protecting Confidential Information and Intellectual Property

Like the Company's physical assets, our confidential and proprietary information and our intellectual property (IP) 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.
- / 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.
- / Contact the Legal Department to learn more.

What does this mean for me?

Situation: I have quite a long commute to the office by train. To make the best use of my time, I sometimes make work-related calls.

Question: Is this a problem?

Answer: You must be careful not to discuss non-public company information in public places, such as in taxis, trains and elevators or at conferences and trade shows. When it is necessary to conduct a telephone call in a public place, be mindful of your surroundings.

4.1.4 Understanding Confidential Information

Confidential information can come in many forms. Examples include the following:

- / 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.
- / Business plans and results.
- / Bid information.
- / Unpublished pricing information.
- / New product plans.
- / Internal reports, policies and procedures.

4.1.5 Third-Party Intellectual Property

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

We should not copy a third-party's copyrighted materials (or make other works based on them) for use on behalf of Archroma unless we have received permission. Material available through the Internet or without a copyright notice is not necessarily free for us to use.

Contact the Legal Department immediately if:

- / A question arises regarding a third party's IP rights.
- / A third party claims that a violation of its IP rights has occurred. We never respond to any such claim without the approval of the Legal Department.

What does this mean for me?

Situation: One of my new hires is from a competitor of Archroma's. 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.

4.2 ACCURATE COMPANY RECORDS AND REPORTING

Open, honest and effective communication requires accurate and truthful company records and reporting. All documents and records must be prepared precisely and must reflect the transactions they relate to. This applies equally to relationships with investors, customers, employees and business partners, as well as with the public and all government offices. Maintaining the integrity of our records ensures we follow the law as we plan for the future.

Accurate, complete and honest recording and reporting of financial and non-financial information are important for our:

- / Credibility and reputation.
- / Legal and regulatory obligations.
- / Ability to make accurate projections and business decisions.
- / Responsibility to shareholders and other external stakeholders.

We must therefore be sure that all of the records we create and submit, including timecards, expense reports and inventory reports, are true, fair and accurate and not intentionally or unintentionally misleading.

WHAT WE DO:

We maintain business records ethically 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 necessary 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.
- / Promptly submit records to auditors as required or requested.
- / Preserve any record subject to a legal hold for an investigation or audit.

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.

4.2.1 Document Management and Records Retention

The proper retention of our documents and records is vital to our business. As such, we must maintain all documents, files and other covered communications according to our applicable policies and schedules, or when a "hold notification" has been issued.

4.3 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 personal interests interfere or may be perceived to interfere with our ability to make objective business decisions. Such conflicts can also impair our ability to work effectively on Archroma's behalf.

WHAT WE DO:

We avoid conflicts of interest when we:

- / Never use our business information in a way that creates a conflict between our personal interests and Archroma's interests.
- / Disclose any financial interest or investment we have in an Archroma competitor, supplier, customer or any entity that may 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.

4.3.1 Understanding Conflicts of Interest

A conflict of interest arises when an employee's personal interests interfere or may be perceived to interfere with Archroma's interests or the employee's work-related duties. Areas where conflicts of interest may arise include:

- / Having a family member or friend, a person with some other relationship to you, 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 or close friend.
- / Taking an outside job, especially one with an Archroma business partner or competitor.
- / Serving as an officer, partner, consultant or manager with any organization doing business or seeking to do business with Archroma.
- / Owning a significant financial interest in another company with which Archroma does business.
- / Conducting business transactions with entities that you, relatives or close friends own or have significant interest in.

Promptly inform your line manager or Archroma Compliance Team of any personal interest you could possibly have in connection with the execution of your professional duties.

What does this mean for me?

Situation: I've noticed that one of our equipment suppliers has delivered defective machinery. I know the machinery is still under warranty. The supplying company is owned by my father-in-law.

Question: I don't want to damage my father-in-law's reputation by having the defect remedied. What can I do?

Answer: Your decision-making should not be influenced by your personal relationship to the supplier. It is your duty to act in the best interest of Archroma. You should consult your supervisor or the Legal Department regarding the proper steps for managing the defective product. You should also alert your manager, HR or the Archroma Compliance Team to the fact that the supplier is owned by your father-in-law.

4.4 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 utilize Archroma Corporate tools to execute day to day work. Publicly available and free IT services might generate compliance issues, compatibility or technical issues, or increase risk exposure hindering Archroma IT team to properly protect Archroma environment. If 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 hire, subscribe, develop or engage technology solution service providers without the involvement and advice of Archroma IT team.

Archroma provides yearly training and 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 employees do not use Archroma information on any publicly available tool (free or paid) including Artificial Intelligence and Machine Learning (AI/ML) tools available in the market.

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

4.4.1 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 all 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 Archroma information. Use of corporate cloud tools such as OneDrive and/or SharePoint should be the preferred option to hold, collaborate and share.
- / Our communications infrastructure carry and house sensitive business information and our critical key for business operations. Archroma IT may monitor devices and IT systems for security and performance reasons.

WHAT WE DO:

We safeguard our information technology when we:

- / Compose all electronic messages (emails, 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; never install private software on Archroma systems without authorization.
- / Never misuse, copy or steal Archroma's software or other IT infrastructure. Misuse includes copying or using Archroma software for private purposes.
- / Ensure that only authorized personnel have access to computer and IT systems.
- / Protect our user IDs and passwords and change them regularly.
- / Never open suspicious links in emails or on the Web.
- / Report any breaches in IT security immediately to your manager and the 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 in any device, since you will not be able to control the use of the information you upload using such services. Please engage Archroma IT if you have a business need for such tools.

4.4.2 Handling Public Inquiries and Using Social Media

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.

4.4.3 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. Public inquiries must always be directed to the Global Communications team.

WHAT WE DO:

We use social media best when we:

- / Ensure that our conduct on social media matches our conduct at work.
- / Use our best judgment and common sense about what to share.
- / Never make discriminatory, offensive or hostile remarks online.
- / Ensure that social media posts about Archroma preserve or enhance our reputation.
- / Never speak on behalf of Archroma on social media.
- / Never share confidential and non-public information.

4.4.4 Personal Social Media Use

You may at times want to use your personal social media to post about Archroma. Keep these Do's and Don'ts in mind:

WHAT WE DO:

- / Make it clear that although you are an Archroma employee, your views are your own.
- / Be careful with personal social media at work.
- / If you are a manager, you need to be particularly careful as your position may lead people to believe or infer that you are speaking on behalf of Archroma.

WHAT WE DO NOT DO

- / Respond to negativity.
- / Use an Archroma email address.

5. INTEGRITY WITH OUR COMMUNITIES



5.1 ANTI-MONEY LAUNDERING REGULATIONS

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 regulation as part of our responsibility as a global corporation.

Archroma complies with all relevant national and international laws and regulations covering anti-money laundering and other sanction or embargo 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.
- / You must abide by applicable anti-money laundering laws and internal procedures 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.
- / It is important to take all necessary precautions. You must be vigilant about irregularities in payments. 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.

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 Legal has advised you how to proceed. This approach enables Archroma to take appropriate legal steps in a timely fashion.

5.2 COMPLYING WITH INTERNATIONAL TRADE 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 laws are complex and vary from location to location. 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 WE DO:

We comply with international trade laws when we:

- / Never recruit, market or distribute across international borders without first knowing the regulations.
- / Never do business with companies or individuals on sanctions lists.
- / Assess risk and conduct due diligence for all third parties with whom we plan to do business.
- / Contact the Archroma Compliance Team with any concerns, or if any customers or business partners ask us to participate in a boycott.
- / Comply with all restrictions regarding access to customer information.

5.2.1 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, you 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.

What does this mean for me?

Situation: I'm a production chemist at Archroma in North Carolina. I'm leaving tomorrow on a last-minute trip to India. I need to take my laptop, which contains Archroma production recipes and workflows. I know I should have obtained an export license, but time was short.

Question: Can I leave the country without the license as long as I apply for it before I leave?

Answer: No. You need all necessary license before leaving the country with export controlled technology. Export trade controls can apply to products, software and technology, including those that an Archroma employee may carry while traveling abroad. If you are unsure whether you need an export license, seek guidance from the Archroma Compliance Team.

5.2.2 Boycotts

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 be alert to boycott requests and raise all such requests to the Archroma Compliance Team.

5.3 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).

5.3.1 Political 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.

5.4 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.
- / Never use or work with Suppliers who use child or prison labor anywhere in the world.
- / Report violations of human rights if we become aware of them.

5.5 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.

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:

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

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.

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.

FINAL STATEMENT

Message from our Archroma Compliance Team

Thank you, everyone, for all you do every day to adhere to this Code of Conduct. Your passion for our mission as a company at the forefront of our industry and your dedication to acting with integrity at all times are the foundations on which Archroma and our shared future is built.

Each of us must live up to the high ethical standards reflected in this Code so that we make the right decisions, foster trust with each other and with our customers and other stakeholders, and achieve our business goals.

When in any doubt about how to act to achieve compliance, please speak up. Ask your manager or HR support or contact the Archroma Compliance Team or the Legal Department. We will always assume that any question or report is in the best interests of Archroma. The consequences of non-compliance are serious, and could include fines or penalties for our Company and termination and prosecution for individuals. Abiding by applicable laws and acting with integrity is the only acceptable way to do business as part of the Archroma team—it is how we protect ourselves, our fellow colleagues and our Company.

