

CODE OF CONDUCT



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Message From the Executive Board

GlobalAmines¹ is unconditionally committed to excellence in the production and distribution of fatty amines and their derivatives on a global scale, relying on technological superiority and notable operational competence. We offer a comprehensive range of products to suit a variety of applications.

We are aware that our actions impact the environment and communities worldwide. Therefore, since the Global Amines Group was founded, we have certain core values and guiding principles that are essential to our business operations and are key to our ambition to deliver sustainable and profitable growth. Aiming to systematize and propagate these principles, the Global Amines' Code of Conduct ("Code") sets out standards in the areas of ethics, environmental, social responsibility, data privacy and corporate governance which we expect all our suppliers and customers to comply with.

We believe that faithful compliance with this Code will both (a) contribute to our respective supplier's and customer's responsible development and sustainable success; and (b) allow Global Amines to conduct its businesses in a professional, ethical and lawful manner.

¹ Global Amines shall collectively refer to Global Amines Company Pte. Ltd., all of its subsidiaries and Clariant Wilmar Aliphatic Amines (Lianyungang) Co., Ltd.

Scope and Purpose

APPLICATION AND SCOPE

This Code applies to all parties who have or intend to have a relationship with Global Amines, including, but not limited to, service providers, suppliers, customers, partners, representatives, distributors, or anyone who has undertaken to comply with this Code (collectively, the “Parties” and each, a “Party”).

This Code will be considered an integral part of all contracts involving the Parties and us, including contracts with customers, partners and suppliers. We consider that a Party’s compliance with the guidelines of this Code is an imperative requirement for establishing and maintaining any type of relationship with Global Amines. Therefore, it is the responsibility of all Parties to fully comply with this Code. If the standards set out in this Code are stricter than those required by local laws, the standards set out in this Code shall prevail.

At Global Amines, we uphold the highest standards of behavior in all our activities, both within the organization and in dealings with external parties. This Code contains a brief and structured outline of the fundamental principles that should consistently guide our actions.

PURPOSE

Our purpose is to manufacture and trade fatty amines and their derivatives with standards of excellence in highest standard of quality, ethics and safety.

The inspiring and guiding principles of this Code are:



Scope and Purpose

COMPLIANCE WITH THE LAWS

We are equally committed to ensuring that the Parties act in accordance with legality and good faith, adhering to the legal and regulatory requirements applicable to them as a condition for maintaining their relationship with Global Amines. Lastly, we must ensure that all our operations are properly licensed and authorized, and that all of our suppliers and customers hold the necessary licenses and authorizations to operate their respective businesses in compliance with applicable laws and regulations.

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Lastly, we must ensure that all our operations are properly licensed and authorized, and that all of our suppliers and customers hold the necessary licenses and authorizations to operate their respective businesses in compliance with applicable laws and regulations.

Ethics and Integrity

We strongly repudiate any act that constitutes unfair competition, use of privileged information, fraud, money laundering, financing of terrorism and any crimes or any act that may be considered unethical or illegal. All Parties will be committed to working against corruption, including extortion and bribery. A Party shall conduct its business using fair business practices, consistent with fair competition and in compliance with all applicable laws, rules, and regulations.

ANTI-CORRUPTION AND ANTI-BRIBERY

Any acts or forms of corruption, whether public or private, are not tolerated. Global Amines is committed to adopt all necessary measures to prevent acts of bribery, corruption or illicit conduct.

A Party shall not give or offer anything of value, directly or indirectly, to any government official or any commercial party for the purpose of improperly obtaining or retaining a business advantage. All Parties acting on our behalf or in connection with Global Amines' business are prohibited from giving or offering anything of value directly or indirectly to any government official or entity in order to improperly obtain any business advantage or affect any government act or decision. This prohibition includes facilitating, expediting or "grease" payments made to government officials, either directly or indirectly, in order to expedite any official service or function.

SANCTIONS AND MONEY LAUNDERING

All Parties are required to fully comply with all relevant trade sanctions laws and regulations, including, but not limited to, the sanctions programs administered by the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC), the U.S. Export Administration Regulations (EAR) enforced by the Department of Commerce, the UK Export Control Act of 2002, the laws and regulations of the State Secretariat for Economic Affairs (SECO) in Switzerland, and the sanctions frameworks established by the European Union. All Parties who deal with Global Amines must ensure strict adherence to these legal requirements and are expressly prohibited from engaging in any business activities, transactions, or dealings, directly or indirectly, with embargoed or restricted countries, territories, blocked persons, or individuals or entities designated as sanctions targets under applicable laws and regulations.

Additionally, a Party shall not facilitate, enable, or participate in any transactions involving third parties that would result in dealings with embargoed countries, blocked persons, or designated individuals or entities, nor shall they engage in any actions that could circumvent or violate these sanctions regimes.

Ethics and Integrity

All Parties are responsible for maintaining robust compliance programs, including regular screening of counterparties against applicable sanctions lists, conducting due diligence to ensure compliance with export controls and trade restrictions, and promptly reporting any potential violations or concerns to the appropriate authorities.

Failure to comply with these obligations may result in immediate termination of business relationships, legal action, and liability for any resulting damages or penalties. All Parties must also certify their ongoing compliance with these requirements and cooperate fully with any audits, investigations, or inquiries related to trade sanctions compliance.

CONFLICT OF INTEREST

A conflict of interest arises when an individual's personal interests, relationships, or affiliations could improperly influence, or appear to influence, their professional judgment, decisions, or actions. To maintain integrity and impartiality, all Parties involved in a contractual relationship with Global Amines must disclose any financial, personal, or professional relationships that might affect their ability to act objectively, including but not limited to ownership stakes, familial ties, or prior affiliations with entities relevant to the matter at hand.

Every Party involved in a contractual relationship with Global Amines is required to steer clear of any conflicts of interest that might undermine their capacity to carry out their duties to Global Amines impartially. They are also obligated to inform Global Amines of any apparent, possible, or real conflicts, including any connections or associations that could potentially lead to such a situation.

ANTITRUST / COMPETITION

Law Global Amines requires all Parties to strictly comply with applicable competition laws in its local jurisdictions or jurisdictions where the business is conducted, which are intended to promote fair and open competition for the benefit of consumers. Companies must avoid interfering with the natural dynamics of supply and demand in the market and should focus on competing through lower prices, innovative products, and improved services. Prohibited activities include exploiting a dominant market position and entering into agreements or arrangements that impact pricing, such as price fixing, dividing markets, engaging in group boycotts, enforcing resale price maintenance, practicing unlawful price discrimination, or imposing trade restrictions.

Product Quality and Safety

Global Amines is committed to (a) complying with all regulatory requirements applicable to chemical products, ensuring compliance with the highest standards of quality, safety, transparency and customer information; and (b) promoting the safe and responsible management of chemicals throughout our business chain while continuously striving to minimize environmental impact.

We expect all Parties to uphold compliance with the work standards, neither (i) adopting any conduct that may harm the quality of our products and their suitability to applicable regulations; nor (ii) acting in a way that violates any applicable regulation or puts at risk the health and safety of customers or people directly or indirectly involved in the Global Amines business.

We also provide our customers with sufficient and complete information about the characteristics of our products, including guidelines for their safe handling and usage. We expect all Parties to comply with the same safety and information standards, as well as to engage proactively with stakeholders throughout the production and business chain, especially with potential consumers and end customers.

Environmental Liability

Global Amines is committed to protect the environment and preserving life in all its aspects by ensuring full compliance of our activities with applicable environmental laws, policies and guidelines, as well as making every effort to reduce the environmental risks and impacts of our operations.

We consider the ongoing and proper management of waste as essential and imperative, alongside the adoption of practices that minimize environmental impact and promote the use of sustainable resources. Any waste, wastewater or emissions shall be measured, tested, controlled and, if required, treated prior to release into the environment. Waste should be reused or recycled where possible.

All Parties must guarantee adherence to all relevant regulations and guidelines concerning environmental protection that are in effect in the regions where they conduct their operations. They are responsible for securing all necessary environmental permits, licenses, registrations, and other required authorizations, ensuring that the operational and reporting obligations associated with these are fully met.

Labour Practices

Global Amines requires its supply chain to adhere to globally recognized human rights principles, which encompass ensuring freedom of association, the right to organize, the eradication of forced labour, the prohibition of child labour, the promotion of equality and anti-discrimination rights:

- Equal opportunity must be available for employees at all levels, regardless of color, race, gender, gender identity, age, ethnicity, national origin, sexual orientation, marital status, religion, veteran status, disability, or any other characteristic protected by law.
- A safe and healthy workplace must be provided that promotes well-being and protects the environment.
- Working hours and compensation for overtime must be in accordance with local laws.
- The work environment and supplier operations must be free from any instances of human trafficking, forced labour, or child labour, with the minimum age for employment and hiring criteria adhering to International Labor Organization conventions or relevant national legislation; suppliers are required to ensure that workers' contracts clearly and comprehensively explain employment terms and conditions in a language easily understood by employees, while also refraining from participating in or endorsing any form of corporal, mental, physical, sexual, or verbal abuse, including threats of such behaviour, as well as any type of harassment or intimidation.

For Global Amines, confidential information is highly valuable and must be protected in terms of its integrity, confidentiality and availability. Company-owned information may only be used for purposes approved by Global Amines.



If there is uncertainty regarding the confidentiality of specific information, such information must be considered confidential for all purposes.

Privacy and Personal Data

We view privacy and the protection of personal data as a fundamental right of all individuals. At Global Amines, we guarantee and promote the protection of the personal data of our employees, customers, suppliers and any stakeholders. Personal data must always be collected with the consent of the data subject and used only for the time necessary to fulfill the intended purpose of the processing, with utmost caution taken to prevent any leaks.

Compliance with all applicable data protection legislation is mandatory throughout the production and business chain associated with Global Amines. In the event of a privacy breach involving personal data, it must be reported immediately to managers and/or relevant departments, or through the communication channel outlined in this Code, and the issue must be addressed and remedied as quickly as possible.

Intellectual Property

Global Amines has established years of technological superiority in its industry, with innovations that ensure excellence in the production and distribution of fatty amines and their derivatives globally. Therefore, Global Amines' intellectual property is an important asset and a competitive advantage that contributes to its success. We value the protection of Global Amines' intellectual property rights in the same way that we respect the intellectual property rights of others.

Violations, Questions and Reports

Violations of this Code are serious offenses and will be dealt with impartiality, regardless of the offender's identity. It is the responsibility of all Parties to report any deviation of conduct and suspected violation of the principles set out in this Code. Failure to address possible violations will also be considered unethical conduct.

If there are any doubts, violations, or suspected violations of this Code, company policies, or applicable laws, they must be reported through the designated communication channel.

Reports can be made anonymously, and within the limits permitted by law, we will ensure the confidentiality and secrecy of the investigation process. Global Amines encourages and supports the use of this reporting channel, emphasizing that all reports contribute to the continuous improvement of internal practices and processes.

Corrective Measures

All suspected violations of this Code and related complaints will be taken seriously and thoroughly investigated. Non-compliance with Global Amines' rules of conduct will not be tolerated and may result in disciplinary measures. For customers and business partners, consequences may include warnings, fines, termination of agreements, removal from the list of approved partners, and legal action to seek compensation for any resulting losses or damages.

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