

PARTNERING WITH VANTAGE™

Third-Party Code of Conduct

Vantage Specialty Chemicals, Inc.™ and its subsidiaries (Vantage™) are committed to maintaining the highest standards of ethics and integrity throughout its business practices and relationships.

This Third-Party Code of Conduct has been developed to convey our requirement regarding the ethical conduct we demand from our suppliers, distributors, subcontractors, agents, customers, and all other third parties with whom we work (Third-Party Partners). Vantage expects all our third-party partners to conduct business responsibly and lawfully — with integrity, honesty and transparency.

As a Third-Party Partner working with Vantage, you are required to comply with all applicable Federal, State and Local Laws and Regulations, including those pertaining to antitrust, trade regulation, bribery, labor matters, the environment, intellectual property, including confidentiality, and restrictions on foreign trade.

This Third-Party Code of Conduct describes the minimum standards of ethical and responsible conduct required for our third-party partners. We require our Third-Party Partners to take diligent steps to ensure that this Third-Party Code of Conduct is communicated throughout their organizations and fully complied with.

For those Third-Party Partners found in violation of this Code of Conduct, Vantage reserves the right to immediately terminate business with said Partner.

Business Ethics

Integrity

Third-Party Partners are required to avoid any form of corruption, bribery, extortion or embezzlement. Third-Party Partners will not offer or accept bribes or other unlawful incentives to/from their business partners. Third-Party Partners shall not offer to Vantage employees gifts or any other kind of personal benefit resulting from the relationships with the Third-Party Partner. The Third-Party Partner undertakes to allow Vantage's performance of compliance audits and to provide Vantage with any required assistance to respond to any requests or demands of governmental authorities.

Antitrust/Competition Law

Vantage requires Third-Party Partners to compete fairly and always comply with applicable competition and antitrust laws

and regulations. Prohibited actions include, but are not limited to, abuse of a dominant market position as well as any agreements or understandings among commercial parties that affect prices (e.g. price fixing, market allocation, group boycotts, resale price maintenance, unlawful discrimination on prices or restrictions on trade, etc.).

Identification of Concerns

Third-Party Partners shall encourage their workers to report concerns or illegal activities within their workplace without threat of reprisal, intimidation or harassment. Third-Party Partners shall investigate and take corrective action where needed. All reported cases will be officially recorded by Third-Party Partners.

Privacy/Intellectual Property

Third-Party Partners will safeguard and make only appropriate use of confidential information and ensure that all employees' and business partners' privacy and valid intellectual property rights are protected.

Conflict of Interest

Third-Party Partners shall avoid engaging in any activity that would conflict, interfere or even create the appearance of a conflict with their business with Vantage.

Labor & Social Accountability

Human Rights

Third-Party Partners must uphold the human rights of workers and treat them with dignity and respect, including, permitting freedom of association and recognizing the right to collective bargain, consistent with all applicable laws; eliminating discrimination in hiring, employment, and compensation based on race, color, age, gender or gender identity, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin, or marital status; and creating a workplace free of harsh, inhuman treatment, without any harassment or any other form of abuse, including sexual harassment or abuse.

Forced/Child Labor

Vantage demands that our Third-Party Partners and their subcontractors abstain from the use of any form of forced, compulsory, illegal or undeclared labor. Third-Party Partners shall not use child labor below the age of 16 or the applicable minimum legal age, whichever is higher. The employment of young workers shall be consistent with the International Labor Organization core labor standards and the United Nations Global Compact principles.

Working Hours, Wages and Benefits

Third-Party Partners must comply with all applicable wage and hour laws and regulations, including those relating to minimum wage, overtime, and other elements of compensation, and must provide all legally mandated benefits. Third-Party Partners must notify their employees of the method used to calculate wages and shall pay wages in a timely manner. Deductions from wages for disciplinary reasons are prohibited. Third-Party Partners are fully responsible for the quality, performance, behavior, supervision and protection of their personnel.

Health, Safety, Environment and Quality

Employee Health and Safety

Third-Party Partners must be committed to the safety and health of their employees and shall provide and maintain a safe work environment by minimizing physical and chemical hazards through proper equipment, design, engineering and administrative controls, preventative maintenance, safe work procedures (including lockout/tag out) and ongoing safety training. They are responsible for assuring that all workers are qualified to perform their work functions safely. They shall provide workers with appropriate workplace health and safety training in their primary language and health and safety related information shall be clearly posted in the facility. Third-Party Partners shall address safety hazards, comply with all applicable laws and regulations, including all required permits, licenses and registrations. Third-Party Partners shall identify and assess possible emergency situations in the workplace and minimize their impact by implementing emergency response plans and procedures.

Product Safety

Material safety data sheets containing all necessary safety-relevant information will be made available by Third-Party Partners for all hazardous substances and will be provided to Vantage with shipments.

Process Safety

Third-Party Partners will have safety programs in place for managing and maintaining all their production processes in accordance with the applicable safety standards and laws. Third-Party Partners will address product-related issues and their potential impact during all stages of the production process. For hazardous installations, the Third-Party Partner will conduct specific risk analyses and implement measures that prevent the occurrence of incidents such as chemical releases and/or explosions.

Quality Requirements

Third-Party Partners will meet generally recognized or contractually agreed quality requirements in order to provide goods and services that consistently meet Vantage's needs, perform as warranted and are safe for their intended use.

Environmental Compliance

Third-Party Partners must be committed to reducing their environmental impact by: obtaining and complying with all required environmental permits, licenses, information registrations, and restrictions; ensuring safe handling, movement, storage, recycling, reuse, and management of waste, air emissions, and wastewater discharges; and preventing and mitigating accidental spills and releases to the environment. Third-Party Partners shall endeavor to reduce or eliminate waste of all types, including water and energy.

Management Systems

Reporting & Communication

To the extent permitted by law, Vantage encourages Third-Party Partners to notify Vantage and seek guidance regarding the Third-Party Code of Conduct, if they become aware of a situation that violates, or appears to violate, this Third-Party Code of Conduct. Vantage will not tolerate retaliation against anyone reporting a concern under this Third-Party Code of Conduct in good faith.

Audits & Assessments

Third-Party Partners must complete a self-audit questionnaire regarding their facilities and operations to ensure compliance with this Third-Party Code of Conduct, including legal and regulatory requirements. Vantage reserves the right to investigate instances of non-compliance with this Third-Party Code of Conduct, which may include a site audit of a Third-Party Partner.