



the global code of conduct



/ efficacy usability allure integrity profitability™

a word from Guillermo



Guillermo

the Ashland way

our vision is to make a better world by providing creative solutions through the application of specialty ingredients and materials

our way is to respect, protect, and advance the people we work with, companies we serve, shareholders who invest in our future, communities we're a part of, and planet we share

our values

1 | safety

2 | ethics

3 | integrity

4 | people

5 | foresight

6 | passion

7 | partnership

a message from our Chief Compliance Officer



our way

our Code, our responsibilities

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review the basics for putting our values to work



- Our values help define who we are and where we're going as a company.
- Everyone at Ashland needs to follow the law, our Code and our policies.
- If we see something that may be unsafe, unethical or unlawful, we should Speak Up.
- We should not worry about retaliation for reports made in good faith.
- Anyone who violates the Code will be subject to disciplinary action.



our Code, our responsibilities

retaliation

good faith

Retaliation means any negative employment action taken against someone because he or she has made a report in good faith or is going to make a report in the future. Retaliation can take many forms, including:

- firing someone because they have reported unethical behavior, or refusing to hire or promote them
- threatening someone who has made a report or giving unjustified negative evaluations or reduced pay
- treating someone unfairly because of a report or in order to stop someone from making a report in the future

Making a report in **good faith** does not mean you have to be certain that something unethical is happening – it just means that you have a genuine reason to believe something may be wrong.

our way of speaking up

Note: Due to privacy laws in certain countries and in the European Union, the Global Speak Up line may allow only certain types of calls pertaining to such areas as accounting, financial, auditing and bribery matters. The operators at the Global Speak Up line will assist you in understanding country-specific requirements. In those countries with restrictions, contact either the Law department, the Global Ethics & Compliance Office, or your Human Resources manager to report other issues.





is it legal?



Is it consistent with our Code,
our policies and our values?



Are you treating others as you
would wish to be treated?
Would it be OK if everyone
acted this way?



If your reasoning and decision were
to be publicized and read about by
your family, friends and colleagues,
would you be proud of the story?

If the answer is “NO,” don’t do it.
If you are still unsure, seek help.

our way of working together

safety first

**ensuring a workplace
free from violence**

**maintaining a drug-free and
alcohol-free workplace**

did you know?

While anti-discrimination laws may vary by location, at Ashland we prohibit employment-related decisions based on any of the following:

- age
- gender
- race
- religion
- gender identity
- any other personal characteristics that are protected by the laws where you work
- disability
- national origin
- color
- sexual orientation
- veteran status

**valuing diversity and commitment
to non-discrimination**

our way of working together

preventing harassment

[harassment](#)

did you know?

Sexual harassment is gender based and can take many forms, including:

- unwanted advances or touching
- inappropriate sexual jokes
- sexually suggestive comments
- requests for sexual favors
- inappropriate comments about another's appearance

Non-sexual harassment can also take many forms, including:

- offensive comments
- racist jokes
- derogatory pictures related to race, religion, ethnicity, gender, age or other protected groups

complying with wage and hour laws

protecting human and economic rights

It is important to note that harassment can be verbal or non-verbal, physical or non-physical and sexual or non-sexual in nature. In order to keep harassment out of our workplace, we must be sure that our comments and actions are appropriate and respectful.

review the basics for putting our values to work



- If we see unsafe practices, we should always Speak Up.
- Substance abuse creates safety hazards.
- Threats of violence should not be taken lightly – they should be reported.
- If someone is in immediate danger, we should contact the police as quickly as possible.
- Diversity is an asset – our wide range of backgrounds and experiences helps us come together to solve problems.
- It's important to include others and to foster an environment where everyone is valued and respected.
- Discrimination and harassment are never acceptable.
- We have policies in place to support the human and economic rights of our workers.



our way of acting ethically

conflicts of interest

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gifts and entertainment

soliciting or accepting gifts and entertainment

offering gifts and entertainment

did you know?

You have a responsibility to consider whether your personal relationships, outside activities or financial interests may create an actual or perceived conflict of interest. Simply having a conflict of interest is not necessarily a violation of this Code, but failing to disclose it may be. If a conflict or potential conflict arises, tell your supervisor immediately.

QUESTION

money laundering

did you know?

- requests to pay large invoices in cash
- requests to split a large payment into multiple transactions
- other unusual methods of payment
- requests that we direct payments owed to a customer or supplier to someone else instead



our way of acting ethically

preventing corruption and bribery

bribery

- o
- o records
- o third parties

anything of value

government official

Bribery includes any situation where something of value is given – to us or by us – in the hopes of influencing a business decision. Anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), prohibit giving anything of value (such as a payment, gift or bribe) to influence foreign officials, candidates or political parties. This is true even if doing so follows local custom. This prohibition often extends to the official's friends and family members. Any employee or agent of our company involved with foreign transactions or activities must also comply with Ashland's guidelines on the FCPA and other anti-corruption and anti-bribery laws.

The FCPA also requires us to keep books, **records** and accounts that accurately reflect our foreign and domestic transactions. We have specific policies and procedures to help employees with these provisions.

We can also be liable when **third parties** acting on our behalf violate anti-corruption laws. Because these situations can be tricky to navigate, anyone who intends to hire a consultant who will perform services on Ashland's behalf with other third parties must follow our procedures for due diligence. Due diligence is also required before engaging a third party (i.e., agent, reseller or distributor) for the sale of our products outside of the United States. For more information on the due diligence requirement, please see the Due Diligence for International Third Parties and Consultants procedures.



Anything of value includes obvious things such as money and tangible gift items, but it may also include things such as entertainment, a job opportunity, a scholarship for a dependent child, or a loan with a below-market interest rate.

Remember, a **government official** includes all employees and officials, at any level, of a government department or agency, whether executive, legislative or judicial. Appointed and elected officials and officers and employees of companies under government ownership or control are also considered "government officials."

our way of acting ethically

participating in personal charitable and political activity

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data privacy

personally identifiable information

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did you know?

Our data privacy policies require us to protect personal information about Ashland's former, current and potential:

- o customers and suppliers
- o other business partners
- o employees and their family members

Personally identifiable information broadly refers to any information that could be used to identify a specific individual. Examples include: name, email, telephone number, physical address, age, employment and educational training. Some examples of sensitive personal information include: medical information, pay and performance information, financial account numbers, Social Security numbers, race, religion, sexual orientation, criminal convictions and political affiliations.



our way of working in the marketplace



appropriate selection and relationships with suppliers and other third parties

practicing fair dealing

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our way of working in the marketplace

following all applicable international trade controls

imports

exports

dealings

review the basics for putting our values to work



- It's important for us to ensure the safety and quality of our products.
- We compete aggressively for business, but it's important for us to compete ethically.
- We should never discuss subjects such as business plans, pricing or strategies with Ashland's competitors.
- Bribery is never okay – we need to follow anti corruption laws to ensure a fair marketplace.
- We only work with business partners who value ethics and integrity as much as we do.
- We always act ethically when importing and exporting goods.
- It's extremely important for us to follow all applicable laws when conducting international business.

An **export** can occur when a product, service, technology or piece of information is transferred to a person in another country (or shared with a non-citizen located in the same country). Before exporting anything, you must verify the eligibility of both the location of delivery and the recipient. You also need to obtain all required licenses and permits, and pay all proper duties.

An **import** occurs when we bring the goods we purchase from a foreign or external source into another country. Imports are also generally subject to various laws and regulations. Specifically, this activity may require the payment of duties and taxes, as well as the submission of certain filings.

Certain **dealings** that may be restricted include transfers of assets, monetary payments, provision of services, exports of sensitive technology and travel to the countries involved.

our way of protecting Ashland and its stakeholders

financial integrity and accurate record keeping

protection and use of company resources

- [physical assets](#)
- [technology resources](#)

protecting confidential information

[confidential information](#)
[intellectual property](#)

Technology resources include things like our telephones, email, instant messaging (IM), the Internet and our Intranet (FirstHand). You should never use our technology resources for anything inappropriate, including sending anything derogatory or offensive to others – if you shouldn't say it to someone in person, don't say it over email or IM. If you decide to use one of Ashland's technology resources for something personal, you need to make sure that you use it appropriately and only for a short amount of time.

did you know?

Confidential information includes things like:

- business plans
- inventions, trade secrets and formulas
- financial data
- engineering documents
- manufacturing methods
- contracts
- customer information
- research and development
- corporate strategies and business plans
- employee data such as salary and performance information

Confidential information is information that is held in confidence and generally not known outside the company. It can take any form, including whether oral, written or digital.

Intellectual property refers to our ideas, like patents, trademarks, copyrights, trade secrets and business know-how. The rights to all intellectual property created with company materials, on company time, at company expense or within the scope of your duties belongs to Ashland. It's important to note that we also need to protect the intellectual property of others. If intellectual property belongs to someone else, we shouldn't share it or use it without permission.



our way of protecting Ashland and its stakeholders

insider information

theft and fraud

fraud

did you know?

Insider information can be either positive or negative and commonly includes but is not limited to the following:

- information about potential mergers, acquisitions or divestitures
- internal financial information, projections or forecasts
- important product developments
- the acquisition or loss of a major contract
- major organizational changes, such as changes in executive management
- declaration of a stock split or offering of additional securities
- new products

did you know?

Acts of fraud may also include:

- making inaccurate public filings because of fraudulent financial reporting (such as improper revenue recognition, overstatement of assets or understatement of liabilities) or due to misappropriation of assets (such as wire fraud or fictitious vendors)
- depending cash and incurring debt for improper purposes
- fraudulently obtaining revenue and assets, or avoiding costs and expenses
- failing to disclose obligations (such as disclosures about Ashland's financial condition, operating results, management compensation and other areas of business)

Acts of fraud may include the intentional concealment of facts with the intent to deceive or mislead others. Committing fraud isn't just prohibited – it's illegal.

our way of protecting Ashland and its stakeholders

following records management requirements

records

legal holds

participating in audits and investigations

contributing to the Political Action Committee for Employees (PACE)

Records include recorded information created within or received by Ashland that has been or is used in the accomplishment of work, and/or maintained as evidence, and information by Ashland in compliance with legal or regulatory obligations, or in the course of business. This information can either be an original or a copy, and may be in the form of a paper document, an electronic file on a hard drive or shared drive, or various other media types such as tape recordings, CDs, DVDs or videos.

review the basics for putting our values to work



- We are each personally responsible for protecting company assets, including intellectual property and other confidential information.
- Conflicts of interest need to be disclosed – having a conflict isn't necessarily a violation of our Code, but not disclosing it may be.
- We need to follow our policy carefully when giving or receiving gifts and entertainment.
- Insider trading is prohibited, including giving inside information to someone
- else who might be able to use it for personal gain.

Records may occasionally be put under a **legal hold** when they are the subject of or relate to actual or potential litigation. If information is part of a legal hold, it must never be altered or destroyed. Failure to properly preserve these records can lead to serious consequences. The records must be maintained as directed by the Law Department. For further information, see our Records and Information Management and Preservation and Production of Litigation Materials policies.



our way of protecting Ashland and its stakeholders

external communications

try this



correct

incorrect

our way of protecting health and the environment



upholding our commitment to responsible product safety and environmental stewardship

- [environment](#)
- [safety information](#)
- [humanely](#)
- [contract laboratories](#)

Responsible Care® processes

In order to protect the **environment**, we make products that can be manufactured, distributed, used, and recycled or disposed of safely. We also strive to eliminate or reduce emissions, discharges and waste from our operations, and to promote energy efficiency and resource conservation.

We make sure that our customers have important **safety information** so that they can manage risk and inform their stakeholders.

We value the **humane** treatment of animals and will seek replacements for animal methods in safety testing. If replacement methods are not available, we will refine our methods to lessen the stress on the animals as well as the number of animals used.

The **contract laboratories** we use for safety testing must be in compliance with applicable laws, regulations and policies.

our way of administering the Code

our global ethics and compliance program

Ethics Ambassadors

investigating misconduct

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disciplinary action

United States and Canada

International



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