

# Supplier Principles of Conduct

Ingevity provides specialty chemicals, high-performance carbon materials and engineered polymers that are used in a variety of demanding applications, including asphalt paving, oil exploration and production, agrochemicals, adhesives, lubricants, publication inks, coatings, elastomers, bioplastics, and automotive components that reduce gasoline vapor emissions. Through a team of talented and experienced people, we develop, manufacture and bring to market products and processes that help customers solve complex problems.

At Ingevity, we integrate responsible economic, environmental and social principles into our global business strategy and decision making. Our objective is to create value for Ingevity and all of our stakeholders by purifying, protecting and enhancing the world around us, today and well into the future.

The Ingevity Code of Conduct sets forth the principles that apply to all Ingevity employees and aligns with the values that are important to us, as described in our cultural credo, The IngeviWay:

- Safety and Sustainability
- Customers
- People
- Integrity and Ethical Behavior
- Creativity and Innovation
- Commitment to Excellence

Specifically, the values of Integrity and Ethical Behavior, Safety and Sustainability and People correlate directly with the principles described in our Supplier Principles of Conduct.

We require our suppliers to live by the principles described in our Supplier Principles of Conduct.

Ingevity believes that sustainability implies a responsibility to involve our direct and indirect suppliers and contractors in our pursuit for economic performance, environmental quality and social responsibility in our own company, as well as in our supply chain. We therefore expect our suppliers, contractors and business partners to use a proactive approach in establishing and maintaining the standards set forth in our Supplier Principles of Conduct and conduct themselves with responsibility and integrity.

Suppliers must be able to demonstrate compliance with these principles at the request and to the satisfaction of Ingevity. These minimum requirements are part of all agreements between Ingevity and applicable suppliers. We expect our suppliers to develop and implement appropriate internal business processes to ensure compliance with these principles. Ingevity routinely utilizes independent third parties to assess suppliers' compliance with these principles. If a supplier fails to uphold any aspect of our Supplier Principles of Conduct, the supplier is expected to implement corrective actions. Ingevity reserves the right to terminate an agreement with any supplier that cannot demonstrate that it is upholding these principles.

**Anyone with knowledge of violation of these principles should contact Ingevity at: [s-global-trade-compliance@ingevity.com](mailto:s-global-trade-compliance@ingevity.com).**

In the following paragraphs, we present Ingevity's Supplier Principles of Conduct under the sustainability dimensions of Integrity and Ethical Behavior, Safety and Sustainability, and People.



# INTEGRITY AND ETHICAL BEHAVIOR

We expect our suppliers to conduct business ethically, with integrity and in compliance with the law.

## **Compliance with laws is required**

Ingevity's suppliers must operate their businesses in full compliance with all applicable laws, codes, rules and regulations of the countries, provinces, states, regions and municipalities in which they operate.

## **Business practices**

Suppliers shall not engage in bribery, kickbacks, collusive bidding, price fixing or other unfair trade practices.

## **Gifts**

Suppliers must respect that Ingevity employees do not give or accept any gift or favor that could compromise or raise doubts about the decisions they have made. Ingevity's policy on gifts and entertainment states that no gift may be offered or accepted with the understanding that an improper benefit is expected in return. Even the appearance of impropriety must be avoided. Suppliers are expected to respect the limitations placed on Ingevity employees as stated above and refrain from putting them in an uncomfortable situation by offering gifts or other favors that they may not accept.

## **Security and international trade**

Ingevity expects its suppliers to implement security controls to secure their international supply chain to comply with anti-terrorism laws in the countries and regions of the world in which they operate and transact business. Ingevity has specifically

partnered with U.S. Customs and Border Protection (CBP) to secure Ingevity's international supply chain and so requires all suppliers to demonstrate that they are meeting Customs-Trade Partnership Against Terrorism (C-TPAT) security criteria, as published by USCBP, and Authorized Economic Operators (AEO) Guidelines.

## **Conflicts of interest**

Suppliers must avoid or immediately disclose any potential, perceived, or actual conflicts of interest in its dealings with Ingevity or its employees. Conflicts of interest may arise when personal benefits or relationships could influence the judgement and actions of 3rd parties and/or Ingevity employees when conducting Ingevity business.

## **Confidential information**

Ingevity's suppliers must protect and keep confidential any non-public Ingevity information, including financial information, employee information, trade secrets, commercial information and business plans. Suppliers must not disclose any such information without prior authorization from Ingevity and must use such information only for Ingevity's legitimate business purposes. Ingevity requires suppliers to take adequate steps to prevent the misuse, abuse, theft, and wrongful disclosure of Ingevity's confidential information.

## **Intellectual property**

Ingevity suppliers must not use any Ingevity intellectual property other than pursuant to, and in accordance with, express written authorization by Ingevity.

# SAFETY AND SUSTAINABILITY

Our suppliers must comply with all applicable environmental, health and safety laws, regulations and legal requirements in the countries in which they operate.

## **Product quality and product safety**

All products that the supplier manufactures on behalf of or sells to Ingevity shall be designed and produced to be safe for their intended uses, and for other reasonably foreseeable uses. Ingevity is committed to providing products that meet applicable regulatory specifications and quality standards.

## **Sustainability of resources**

Ingevity's commitment to sustainability includes efficient use of resources, respect for the environment and safe and healthy workplaces. Ingevity is committed to the Guiding Principles of the American Chemistry Council's Responsible Care Program, and expects its suppliers to make similar commitments to continuously improve their environmental, health and safety performance.

## Environment

Suppliers are expected to verify that all raw materials used in the manufacture of Ingevity products were sourced in compliance with all applicable laws and legal requirements. To ensure safe handling, movement, storage, recycling, reuse and disposal, suppliers are expected to identify and manage substances that pose a hazard if released to the environment and comply with applicable labeling laws and regulation for recycling and disposal.

## Workplace safety and health

Suppliers shall keep the work environment free from recognized hazards and assure compliance with all applicable laws regarding working conditions, including worker health and safety, sanitation, fire safety, risk protection and electrical, mechanical and structural safety.

# RESPECT FOR PEOPLE

We treat all Ingevity colleagues and business partners with dignity and respect and expect the same of our suppliers. Abusive, harassing or offending conduct is unacceptable and will not be tolerated.

## Child, forced or involuntary labor is not permitted

of our processes, we prohibit the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

## Discrimination is not permitted

Ingevity will not tolerate discrimination in any manner by suppliers of their workers on the basis of race, color, religion, gender, social or ethnic origin, age, marital status, pregnancy, creed or political belief, disability, sexual orientation or any other basis prohibited by law.

## Harassment is not permitted

Ingevity expects its suppliers to provide a work environment that is free from any form of harassment, including verbal, physical, or sexual harassment. Threats or acts of retaliation or physical punishment against workers will not be tolerated. At all times, workers shall be treated with respect and dignity.

## No undocumented workers

Suppliers shall only utilize workers who have a legal right to work.

## Compensation (wages and benefits)

Ingevity requires that suppliers compensate employees in compliance with all laws and regulations relating to minimum wages, overtime, piece work, employee benefits, maximum hours worked per day or maximum days worked per week.

## Freedom of association

Suppliers shall recognize and respect the right of workers to associate freely or organize as permitted by applicable laws and regulations and to be free to raise concerns related to employment issues.

## Supplier diversity

Suppliers are encouraged to have an active supplier diversity program and support the businesses and communities where Ingevity operates by engaging with small businesses, minority and woman-owned businesses and other diverse categories.

## Conflict minerals

Ingevity does not tolerate the use of raw materials that directly or indirectly contribute to armed conflict or human rights abuses in any of its products. The supplier shall have a policy that addresses the responsible procurement of conflict minerals as defined in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and the conflict minerals rule adopted by the U.S. Securities and Exchange Commission in August 2013. Suppliers shall not provide Ingevity with any conflict minerals.

## Personal data

When collecting, using, storing, or otherwise processing personal data in connection with business activities with Ingevity, we expect each supplier to comply with all law and regulations applicable to the processing of personal data and take all appropriate measures to protect and secure personal data in its possession. In the event of any data breaches involving personal data of Ingevity personnel or other personal data provided by Ingevity, we expect to be immediately notified.