

# We Reflect Our- selves

Clariant  
Code of Ethics

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Reflect  
Our-  
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At Clariant, we know that our decisions and actions have an impact. We show consideration for other people, our environment and the communities around us. We reflect on our behaviors to ensure that what we do is done the right way.

## Message from the Chairman

Dear Colleagues,

Our goal is to be a leading company in the specialty chemicals industry. We achieve this by creating above-average value for all our stakeholders – customers, employees, shareholders, and the communities in which we operate.

At Clariant, we know that our decisions and actions have an impact on the environment and the people around us. Our behavior reflects who we are and what we stand for. In an ever-changing environment, it is especially important that we have strong guiding principles. Our six values, our brand, and this Code of Ethics are all part of our identity – everything that makes us as Clariant strong and unique.

Our Code of Ethics lays down our unyielding commitment to ethics and integrity in the way we behave and conduct our business. Each one of us – in the Board of Directors, in the Executive Committee, in management, and in all organizational units – must understand and live up to the values and principles that govern our daily work. We follow the rules, we adhere to the highest ethical standards, we deliver to promise. But what about grey areas? What do we do when a situation falls outside our Code of Ethics and there is no direct answer? We must acknowledge that there are situations where we need to make decisions while faced with ethical dilemmas or where guidance is lacking. This Code of Ethics is a compass that will help us all to work transparently and with integrity. While it does not have all the answers, it does provide tools to enable you to

make the right decisions. The Integrity ‘Yes’ Check is a tool that I encourage you to use in such dilemma situations, use your good judgement, ask questions and reach out for advice if you need it. We all face ethical dilemmas at some point in time and doing the right thing is sometimes the hardest thing to do. And you will not always know the answer, which is fine. But please remember to speak up when you need support or you when observe something that doesn’t feel right.

Clariant is fully committed to ensuring that anyone who raises concerns or points out a potential or actual breach violation in good faith is heard, receives support and respect, and that there is no retaliation against them. Reading the Code of Ethics will not only provide each of us with key information, it is also an act of self-reflection. We should see it as an opportunity to reflect on how we do business today and the way we intend to do business in the future. We can’t make and write a rule for every potential situation, but what we can do is empower you to use our Code of Ethics as a moral compass. Reach out for help if you get stuck, because a workplace that prioritizes ethical business is a great place to work.

Sincerely,

Günter von Au  
Chairman of the Board of Directors

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# How to Use this Code of Ethics and to Whom it Applies

As part of an internationally operating company, we are exposed daily to complex and demanding environments. At some point in our careers we are likely to face challenging situations that require difficult decisions where the right thing to do is not that obvious. Similarly, we might face challenging situations where the right thing to do is obvious, but the decision is difficult to make. As this Code of Ethics cannot cover every possible situation we might find ourselves in, it is essential to seek advice whenever we are unsure of what to do.

Clariant's Code of Ethics is a compass that can help you to navigate through this decision-making process to stay on the right track and to act in your and the company's best interest.

The Clariant Code of Ethics forms an integral part of any applicable employment contract or handbook. Potential violations will be investigated and disciplined if found to be substantiated.

If the standards set out in this Code of Ethics are higher than those expressed by local law, the standards set in this Code of Ethics shall prevail. However, in the unexpected case where local laws conflict with the standards set out in this Code, the local laws shall prevail. In such circumstances, it is worth seeking guidance from a regional manager, country manager, or other relevant authority within the organization.

# Implementation and Enforcement

**The Board of Directors mandates the Executive Committee and management of all Clariant entities to adopt the appropriate resolutions to fully implement the Clariant Code of Ethics. Every Clariant employee, manager and member of the Board of Directors shall be provided with access to the Code of Ethics. Each of us has the responsibility to comply with the Code of Ethics and to raise concerns or to report any violation observed.**

**We will take concerns and reports very seriously and will review them carefully. Substantiated violations of our Code of Ethics will result in corrective measures.**

# Our Values

Clariant's Corporate Values express the core beliefs and behaviors most important to Clariant. They guide our actions and move us all in the same direction, sending a clear signal to all those with a stake in our business. Together with Clariant's Code of Ethics, they fundamentally define and shape the way we do business at Clariant.



It is critically important that we all live up to these Values to enable Clariant to execute its strategy.

# Integrity 'Yes'-Check

Every Clariant employee is expected to use good judgement and consider decisions carefully.

Sometimes, decisions are unclear. When in doubt, using the Clariant Integrity 'Yes'-Check will help you to avoid pitfalls and reflect on how your actions could be perceived by others. If you can answer all questions below with a 'Yes', you know that you are about to do the right thing.

1

Am I seen to act with honesty?

2

If Clariant was my own company, would I decide the same way?

3

Is my behavior aligned with Clariant's Values and Code of Ethics?

4

Would my family and friends be proud of my actions?

5

Would I feel comfortable if news of my conduct makes it on to the first page of a renowned newspaper?

If you are unsure when answering the Clariant Integrity 'Yes'-Check, the right thing to do is to stop and ask for guidance.

# **Our Responsibility**

**Protecting Clariant's reputation and, with that, ensuring our sustainable success only works if we all contribute equally. Therefore, it is the responsibility of each and every one of us to live up to our Code of Ethics at all times.**

**This means that, as employees, we will:**

- read and understand Clariant's Code of Ethics and ask questions if there is anything unclear about it;**

- complete any Code-related training assigned to us within the given timeframe;**
- comply with the Code of Ethics and report any concern or potential breach; and**
- ask for advice if we have doubts or are unsure about a situation.**

**Furthermore, responsibility of those at managerial level is broader. Clariant management is expected to:**

- **demonstrate ethical leadership by openly and transparently living Clariant's Values and the standards set out in this Code of Ethics;**
- **speak up when alerted to misconduct – don't look the other way;**

- **be active whenever in doubt as to whether an action is lawful and seek more information. Simply assuming it is the way things are done in a different cultural context is not good practice;**
- **encourage team members to know, understand and regularly discuss this Code of Ethics and the behavior expected;**

- **provide team members with a platform to speak up, listen to them – and provide feedback openly;**
- **create an environment where team members feel comfortable raising concerns; and**
- **escalate reports from team members as soon as possible – do not investigate them independently.**

# **Integrity Starts with You – Speak Up!**

Clariant encourages you to speak up if you observe any behavior that you consider to be potentially violating our Code of Ethics. It is best to talk to your supervisor, your compliance officer, or someone from the Human Resources (HR), Legal or Environment, Safety and Health Affairs (ESHA) teams, depending on the situation and your comfort with sharing your concerns.

Sometimes, it is difficult to talk to someone personally and you might not feel comfortable speaking up because you fear identifying yourself. Clariant's Integrity Line is a confidential channel operated by an independent third-party through which you can raise your concern and – if you prefer – remain anonymous when doing so. The Compliance department will receive all reports and will involve additional departments or parties as appropriate for further review and, if required, investigation.

All reports and concerns are taken seriously and will be treated with utmost confidentiality.

You can access the Integrity Line via the website: <https://integrityline.clariant.com> or the intranet.

Questions or any concerns relating to this Code of Ethics can also be sent to one of our compliance officers via e-mail – [complianceofficer@clariant.com](mailto:complianceofficer@clariant.com) (non-anonymous).

# Protection from Retaliation

**It is the responsibility of those at managerial levels and above to ensure that anyone who raises concerns or highlights potential or actual breaches is heard, receives support and respect and that there is no retaliation against them. We reserve the right to discipline a self-reporter for their own violations of the Code of Ethics. Retaliation will not be tolerated and is subject to disciplinary action, as are deliberately abusive accusations.**

# Our Guiding Principles

- We Treat Each Other with Respect;
- We Care About our Community and Behave as a Good Corporate Citizen;
- We Comply with Highest Ethical Standards and the Law;
- We Handle Information with Care;
- We Put Safety First and are Committed to Protecting the Environment;
- We Communicate Responsibly;
- We are Committed to Fighting Corruption;
- We Take Care of Our Resources.

# **We Treat Each Other with Respect**

At Clariant, we firmly believe that trust, integrity, appreciation, and respect make our company and all its employees stronger. We want to create a motivating and fulfilling working environment for all our employees as this will lead to strong and sustainable results. Respect is part of everything we do and all our interactions.

In this section:

- **Treatment of People**
- **Harassment**
- **Equality and Non-Discrimination**
- **Respecting Labor Rights**

# Treatment of People

**Respect forms the foundation of every successful collaboration. Every employee has the right to fair working conditions and respectful treatment.**

**At Clariant, we maintain a culture of openness and respect, providing everyone with the flexibility, freedom, and experiences needed to succeed.**

**As such, each one of us is duty-bound to treat colleagues, business partners, or any other person we work with in a respectful, open and appreciative manner.**

**We always treat people as we would want to be treated ourselves and in a way that maintains a high level of personal integrity in what we do.**

## **Respect**

Respect means mutual appreciation and prejudice-free behavior towards colleagues and anyone we are collaborating with across all levels, hierarchies and geographies.

# Harassment

**Clariant does not tolerate harassment of any kind. We will take all measures to prevent harassing conduct.**

**Each of us is responsible for contributing to and promoting a harassment and discrimination-free working environment. We intervene if we witness any behavior that indicates harassment.**

## Harassment

Harassment can be described as any unwelcome behavior that creates an offensive, hostile, intimidating, or non-inclusive work environment. Harassment can take many forms, including verbal remarks, physical advances, inappropriate entertainment or visual displays, and may come from colleagues, supervisors, suppliers, contractors, customers, or any others that have a stake in our company.

Using or circulating offensive materials, language such as slurs, inappropriate comments, or jokes at another person's expense, undermines respect and is not appropriate for our workplace. Harassment may be sexual in nature. This includes behavior such as unwelcome sexual advances, sexually related remarks or jokes, and viewing or downloading pornography or other inappropriate materials while at work or using company resources.

## **Bullying/Mobbing**

Bullying or mobbing is another form of harassment and is defined as systematic, sustained or repeated hostile behavior – either in person or through e-mail, social media and other digital communications – intended to humiliate or exclude an individual.

# 2

## **Learning aid**

### **Question:**

I changed to another department and my new team colleagues make inappropriate comments about me. Whenever they go for lunch together, they do not ask me to join. I also learned that the whole team participates in a group chat on their smartphones, which I am not part of. I feel excluded and humiliated. What can I do?

### **Answer:**

If the situation allows, and you feel comfortable in doing so, share your observations with your colleagues directly or with your supervisor. Alternatively, raise your concern with HR or Compliance. Colleagues who are also aware of inappropriate behavior should speak up too.

# 1

## **Learning aid**

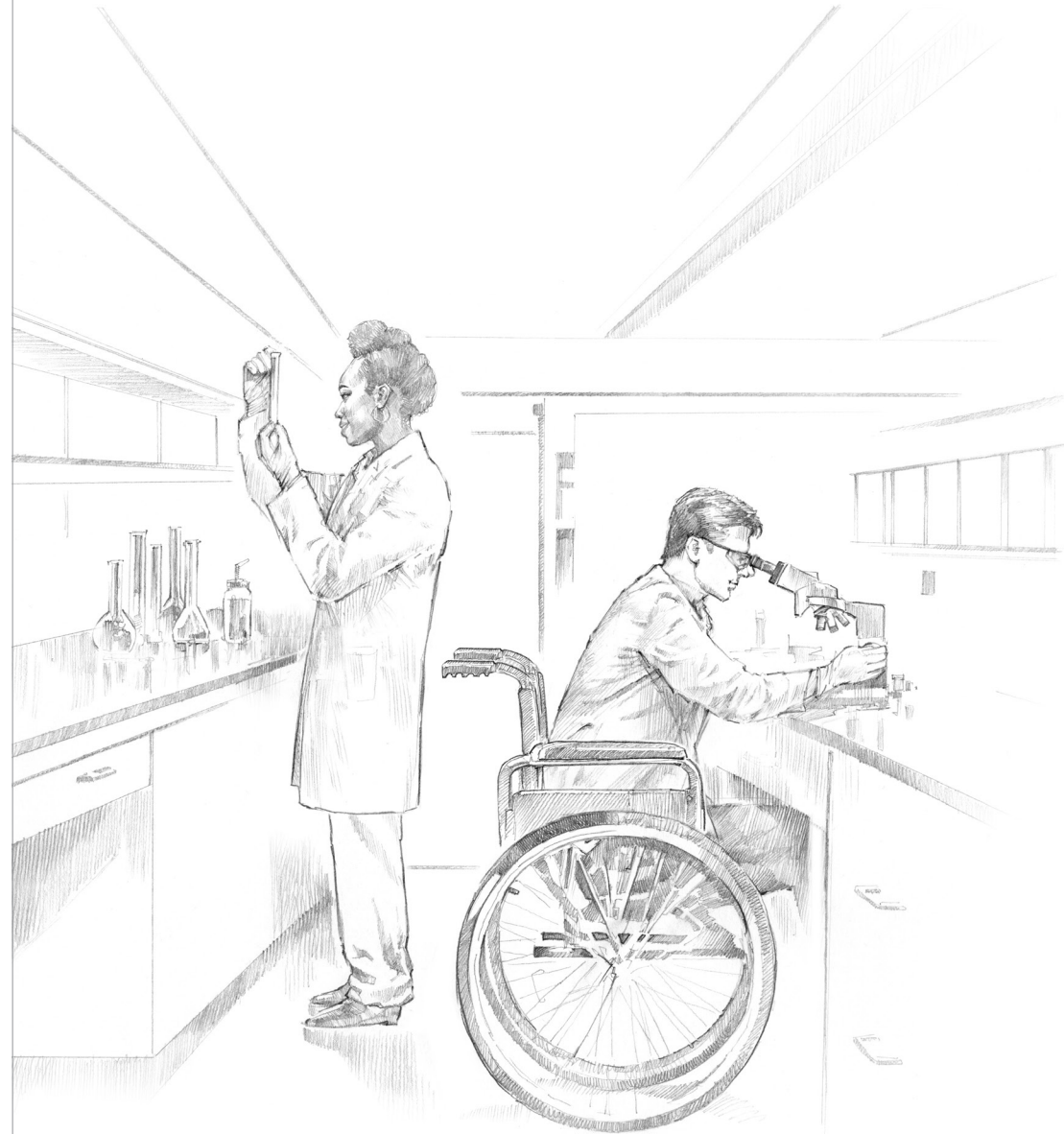
### **Question:**

My new supervisor seems to be very short tempered. In stressful times, my supervisor shouts at me and threatens me with dismissal in front of others. I am afraid of losing my job if I report the situation. Should I remain silent?

### **Answer:**

No, you should speak up about the matter to either someone from HR or Compliance.

# Equality and Non- Discrimination



**Clariant is committed to ensuring a discrimination-free workplace and equal opportunities. We promote an inclusive and diverse environment where everyone has opportunities for learning and training.**

**We will not tolerate discrimination based on race, ethnicity, nationality, religion, gender or gender identity, disability, age, civil status, sexual orientation or membership in a union or political party.**

**In hiring, compensation and promotion processes, every employee and applicant has the right to be treated based solely on their personal skills, abilities, performance and potential.**

# 1

## Learning aid

### Question:

I applied for a position with another team but learned it was offered to a person that seems less qualified than me. I think the reason was because the hiring manager knew about my disability. What should I do?

### Answer:

At Clariant, hiring decisions are based on objective criteria. If you suspect that you were treated unfairly, try to clarify with the hiring manager the reasons that led to the hiring decision. If you do not receive a reasonable answer, speak up and raise your concern with HR.

# 2

## Learning aid

### Question:

I have been with the company for many years and my annual performance ratings have always been at least fully satisfactory. I have a new supervisor since the end of last year who has now rated my performance with a 'needs improvement' without fact-based arguments. Should I challenge this?

### Answer:

At Clariant, the performance review process is based on facts and constructive feedback. All employees are entitled to a fair performance review. You should talk to your supervisor to get clarity or raise your concern with HR in case of inappropriate rating criteria.

# Respecting Labor Rights

Clariant strives throughout all its operations and activities to comply with laws, regulations, and ethical standards at all times; in particular Clariant recognizes the principles concerning the fundamental rights of work stipulated by the International Labor Organization (ILO):

- freedom of association and the right to collective bargaining;
- no forced labor;
- no child labor;
- no discrimination.

Working for Clariant is a matter of choice. We condemn any form of forced labor, child labor, and human trafficking, and we work proactively against it.

We use all available processes to ensure that ages are verifiable and that legal requirements relating to working age are fulfilled.

→ **See also**  
Respecting Human Rights

# 1

## Learning aid

### Question:

I read in the news that a contractor my colleague is considering working with on a project has been known to use child labor. I am not involved in the project. Should I say anything?

### Answer:

Yes. Share your observations with your colleague and, if they insist on working with this supplier, speak up. Selecting a partner that has a history of child labor is unacceptable and must be avoided. Where there is a history of child labor and the business partner claims to have stopped it, we need to verify that this is indeed the case.

# 2

## Learning aid

### Question:

A colleague wants to put together a works council. Their supervisor is threatening them with dismissal if they proceed. Can he do so?

### Answer:

Clariant recognizes the freedom of association according to the four basic principles of the ILO. As such, there is no case for preventive action against your colleague.

# 3

## Learning aid

### Question:

I am on a business trip in an emerging market, visiting a factory of one of our key suppliers in the area. Some of the workers look quite young and it seems to me that they could be under the legal age. What should I do?

### Answer:

Try to clarify your concerns with the factory manager directly. If they assure you that all workers meet the age requirements, ensure you get this confirmation in writing. In any case, address your concerns internally by raising them with your supervisor, HR and Compliance.

# **We Comply with Highest Ethical Standards and the Law**

Laws protect fundamental rights and are a guidance for minimum standards of expected behaviors in society. As an internationally operating company, Clariant will ensure it operates according to the highest standards of ethics and integrity to gain trust with all our stakeholders, to build our reputation and to support good sustainable business. The consequences of non-compliance include high fines and in some cases imprisonment for the individuals involved, as well as serious reputational damage.

We comply with all laws and regulations, our Code of Ethics, internal policies and guidelines, as well as with all the relevant chemical industry codes Clariant is obliged to adhere to.

In this section:

- Fair Competition
- Fraud
- Insider Trading
- Money Laundering
- Embargo and Trade Control Provisions

# Fair Competition

Clariant believes in free and fair competition and deals fairly with its customers and suppliers. We seek competitive advantage through the performance and excellence of our products and not through unethical or unlawful business practices.

Antitrust and fair-trade laws are designed to encourage competition, ensuring that consumers benefit from a broad range of product choices and innovative solutions. They guarantee that our work and customer-driven innovations are rewarded through the success of our products and services.



**At Clariant, we strictly comply with these laws. This means that we do not share business information with any third-party if, as a result, this could limit competition. We therefore only exchange information with a legitimate business purpose and do not share competitively sensitive information with competitors. We determine our commercial strategies, policies, business conduct and, in particular, our pricing independently. We do not align with competitors, directly or via third-parties on these matters. Furthermore, we do not discuss, agree or allocate customers, territories and product markets with our competitors.**

**Although Clariant's products and services might offer premium choices for customers, we will never abuse our market strength or a potential dominant market position by engaging in unfair dealings.**

**If we are in doubt or unsure whether a particular third-party is a competitor, or if any of the above listed situations arise or might arise, we contact Legal.**

## **Competitor**

Any company (or person) that is active in the same relevant product market is a competitor. A company (or person) active in similar markets or in other geographic areas in the same or similar market may also be considered a competitor. Note that a distributor selling our products is a competitor at least on the distribution level. A supplier sourcing the same products as Clariant is a competitor in the upstream purchasing market.

## **Competitively sensitive information**

As a rule of thumb, information that is not in the public domain, that is confidential or that might influence the strategic behavior of a (potential) competitor, is competitively sensitive. This includes information

- (i) that could influence the other party's future competitive conduct,
- (ii) about your business or strategy that you would not want a competitor to know about, or
- (iii) that a customer or supplier would not want you to share with a third-party.

### **→ See also**

Information Security

Insider Trading

Media Relations and Investor Relations

# 1

## Learning aid

### Question:

I am working in sales and I receive a detailed monthly report from our procurement team including data from suppliers on pricing and pricing trends of various raw materials and chemicals. Some of these suppliers are also competing with Clariant downstream for certain products mentioned in the report. I am not sure whether I should be receiving such information and I am also wondering where the data is coming from. Should I ask about it?

### Answer:

Being in sales you may receive general aggregated data from procurement on raw materials and chemicals, but you must not receive individual supplier data on products that Clariant also sells. All data and information that Clariant uses should always come from a legitimate source and not from illegal contacts. Clariant may buy from competitors, but the information exchanged must be limited to the absolute minimum necessary. Furthermore, this purchasing information held by procurement must not be forwarded to sales. In case of doubt, you should always clarify the source of the data and if you are uncertain reach out to Legal for guidance. Everybody has a duty and a right to ask questions or to ask Legal for advice.

# 2

## Learning aid

### Question:

I am at an industry conference where I meet a former colleague. He asks me if I would like to attend a dinner together with peers from the industry for informal discussions about the difficult market environment and potential measures. I am under pressure to reach my sales targets. Should I join the dinner and see if this could improve the situation?

### Answer:

You must not attend the dinner. Always be cautious with informal information exchanges. You must not talk about your business conduct with peers from the industry. This is illegal. Even if you think it might never be discovered or that you might gain insights that could help you cope in a difficult market environment or meet business targets, such behavior is not tolerated at Clariant and could have damaging consequences for our company and you.

# Fraud

**Integrity in our behavior and in everything that we do is critical and must be respected and taken seriously by our business partners. Any information about or related to Clariant that we create or provide must be accurate and reflect the truth. We do not initiate or take part in any kind of fraudulent activity.**

**As such, each of us will make sure that we feed correct and accurate information into our systems and that we document processes and transactions truthfully. Unless required by law or in compliance with our records retention programs, we do not change or destroy transaction records. We do not manipulate or falsify data or results from testing.**

**This helps prevent and detect fraud, ensuring integrity in our data. We ensure that we are not involved in covering up fraud. We report any suspicious information, transactions or activity immediately to Compliance or Legal.**

**In most jurisdictions, fraud constitutes a criminal offense with personal liability for the individuals involved.**

## **Fraud**

Fraud involves any deceptive, deliberate action or omission that is intended to result in financial advantage or other benefits. This includes but is not limited to:

- forgery;
- lying or cheating to obtain information you would normally not have access to;
- theft of company property;
- provision of intentionally misleading information
- falsification of company records such as work time records or expense statements;
- manipulating testing results;
- intentional destruction or concealment of facts which is intended to deceive others;
- recording of fictitious or misleading records;
- misappropriation of funds or other company assets;
- omission to act/accepting when having knowledge about fraud occurring;
- bribery.

### **→ See also**

Accurate Books and Records  
Money Laundering  
Bribery & Corruption

# 1

## **Learning aid**

### **Question:**

I just returned from a business trip and when creating my expense report, I realized that I forgot to take the receipt from the restaurant where I had dinner together with my local team. I roughly remember what we had. Can I list the meal in an Excel sheet and use this as a receipt?

### **Answer:**

No, improvised receipts are not an option. You should talk to your supervisor and to Finance to clarify how you can get the costs reimbursed.

# Insider Trading

**At Clariant, we ensure that all shareholders, stakeholders and the general public are informed simultaneously about any potentially share price relevant information related to our company.**

**As such, we should never use confidential information about Clariant for personal benefit. We may never buy or sell stock in a company while in possession of insider information about the company.**

**We do not pass on such information to someone else. This includes – but is not limited to – family members and other residents of the same household, colleagues, friends, journalists, customers, financial analysts and advisers. In case of doubt we consult Legal.**

## **Insider information**

Insider information is all information not known to the public and that could have an impact on the share prices or other financial instruments. This may include, confidential information on planned acquisitions, divestments, strategic alliances, financial results, new products, new product developments or strategy, changes in the capital structure, major contracts or changes in management.

### **→ Policies**

Insider Trading Policy

### **→ See also**

Accurate Books and Records

Information Security

Data Privacy

# 1

## Learning aid

### Question:

I just found a printout near the printer that contains forecast information about Clariant's upcoming sales figures. What should I do with it?

### Answer:

You should destroy the paper with a shredder or dispose of it in a confidential waste bin immediately. This printout contains share price-sensitive information and therefore must be treated with utmost confidentiality. Talk to your supervisor about it to identify the need to communicate individual accountability in protecting confidential information among those who have access to the printer. Do not share the contents of the printout with anyone and refrain from trading in Clariant shares until the involved sales figures are officially made public.

# 2

## Learning aid

### Question:

At a local townhall meeting, one of the leaders mentions that Clariant is under significant pressure as its quarterly results are not going to be good and each of us will need to push hard to improve the situation. This does not sound good to me and I consider selling my Clariant shares before the quarterly results are published. Am I okay to do so?

### Answer:

No, you are not okay. If you are in possession of non-public and (potentially) share price-sensitive information, you may not make use of such knowledge to gain personal advantage in the trading market. Furthermore, you may not ask someone else to trade on your behalf. Insider trading is a criminal offense and may result in high fines and prison sentences for the individuals involved. You should consult Legal as other meeting participants have become insiders too.

# Money Laundering

**Clariant is committed to the international fight against money laundering and financing of terrorism.**

**Clariant complies with all laws regarding the prohibition of money laundering. We never allow ourselves to become involved in nor tolerate actions that may identify as money laundering.**

## **Money laundering**

Money laundering refers to the introduction of money originating from criminal activities into the regular economy, making it appear as if it had been obtained legally. This requires vigilance in our interactions. It also applies to becoming indirectly involved through the act of a third-party.

### **→ See also**

- Accurate Books and Records
- Bribery and Corruption
- Fraud

# 1

## **Learning aid**

### **Question:**

I have been working for a long time with a third-party distributor and recently heard several rumors about them being involved in money laundering. Can I continue to work with them?

### **Answer:**

Upon knowledge of the rumors, contact Legal or Compliance to better understand the situation and its potential liabilities. Legal or Compliance will help you to assess the third-party in detail to gain assurance on their integrity or to substantiate the allegations. Ignoring the rumors and continuing business as usual would be the wrong behavior.

# **Embargo and Trade Control Provisions**

**Clariant has worldwide business relations and is involved in the global trade of goods and services daily.**

**Wherever we do business, we comply with all applicable national and international export, import and trade compliance laws. This includes restrictions and prohibitions on the import, export or domestic trade of goods.**

**Restrictions depend on the nature of the goods, the country of origin or end use, the identity of the customer, or third-party service provider or employee involved in the trade. In addition to applying to goods, similar restrictions may apply to technologies and services as well as capital and payment transactions.**

**We comply with applicable trade control regulations when goods are purchased, produced, sold or otherwise transferred, and when technologies are transferred or acquired. We also adhere to regulations concerning the handling of dual-use products, combating terrorism and chemical weapons.**

# 1

## Learning aid

### Question:

A distributor is interested in one of Clariant's products. Mostly, this product is delivered to Iran and, as I am aware that there are sanctions, I ask the distributor about their end customer. I do not get a clear answer. Do I need to gain more clarification, or should I proceed with the sale?

### Answer:

When dealing with possible deliveries into sanctioned countries, always consult Compliance and Customs & Foreign Trade to ensure we remain compliant. This matter should be further clarified before any sale is made.

# **We put Safety First and are Committed to Protect- ing the Environ- ment**

We know about the importance of protecting ourselves and the environment. As a company and as individuals, we put safety and well-being at the core of everything we do and are committed to reducing our impact on the environment.

In this section:

- Environment
- Health and Safety
- Product Stewardship

# Environment

**At Clariant, we are aware of our responsibility to protect the environment and we are committed to reducing our environmental impact.**

**We ensure full compliance with all environmental laws, policies and guidelines, and we put constant efforts into minimizing environmental risk and impact, including effect on the local community.**

**We reduce, reuse and recycle our materials to ensure material efficiency and minimize waste generation as much as possible.**

**We put necessary and appropriate hazard preventions in place. An emergency management system is in operation to ensure that we respond quickly and adequately should an incident occur.**

## 1

### Learning aid

#### Question:

I get a call informing me about an emergency test performed by the Global Emergency Management team. I am asked to meet with the emergency team as soon as possible. I need to meet a deadline today, so I do not need to attend, correct?

#### Answer:

Emergency tests are taken seriously. It is critical that we are all prepared if an actual emergency arises. Emergencies can be a serious threat to employees and Clariant and they must be treated as a priority – even if it means that some deadlines are missed.

## 2

### Learning aid

#### Question:

I witness a colleague of mine disposing of what appears to be chemical waste from our production site into the nearby river. I ask her whether she is allowed to, and she confirms, saying that for this type of product there is no issue. I am still not sure whether this disposal is permitted. Is it up to me to further clarify the situation?

#### Answer:

If you have a concern that cannot be clarified, you should speak up. Clariant is committed to protecting the environment so you should share your observations with ESHA to make sure this disposal is in accordance with local regulations.

# Health and Safety



A healthy and safe work environment is one of Clariant's key priorities and we take this responsibility very seriously. Clariant has a health and safety management system in place covering everyone on our sites – Clariant employees as well as contractors and visitors. It also helps to prevent accidents by systematically identifying risks and establishing corrective measures.

Each of us needs to be aware of the rules that apply within our area of responsibility – this includes attending safety and emergency trainings that take place as required. We respect all regulatory requirements related to workplace health and safety and we minimize and manage related risks. Furthermore, we carefully consider special needs that may apply within the workforce including those of younger or vulnerable workers.

In the case of a health and/or safety incident, we report it immediately to the responsible ESHA manager for further investigation. Necessary corrective actions are implemented as a priority according to Clariant's ESHA guidelines.

## **Young workers**

All workers under the age of 18 are considered young workers.

## **Vulnerable persons**

This group includes pregnant women, temporary workers outside of the scope of Clariant's medical surveillance, trainees, mothers who are breastfeeding and employees with certain health conditions.

### **→ See also**

Respecting Human Rights

## **We must all be aware of Clariant's Life-Saving Rules:**

- **use fall protection when working at heights greater than 1.80 meters or 6 feet and outside a guarded area;**
- **always work with a valid work permit whenever required;**
- **use 'lock out / tag out' procedures to protect you from danger;**
- **wear Personal Protective Equipment (PPE) when required;**
- **do not walk or work under suspended loads;**
- **do not disable safety critical equipment without authorization and without having additional precautions in place.**

**If you witness a breach of these rules, you should immediately speak up to your line manager or ESHA.**

# Product Stewardship

Providing innovative, safe and more sustainable solutions is one of our highest priorities. We are committed to promoting the safe use and management of chemicals across the entire value chain. As such, Clariant is signatory of Responsible Care®, the chemical industry's commitment to sustainability.

We comply with regulatory requirements on chemicals and adhere to standards and guidelines without compromise. These ensure the highest hygienic standards and strict quality control in the research, development and production of our products.

Through comprehensive evaluation and customer communication on how to safely manage and use our chemicals, we ensure our commitment to chemical safety. Furthermore, we aim to consistently minimize any risks to the environment and public health and ensure that clear sustainability perspectives are embedded in product development, allowing for a sustainable business and product portfolio based on sustainability.

→ See also

Intellectual Property

# **We are Committed to Fighting Corruption**

Corruption has a devastating impact on society and economies, creating inequality and causing financial instability, impairing wealth and slowing down economic development.

At Clariant, we do not tolerate any form of corruption and we are committed to taking any action necessary to prevent bribery in our business activities.

In this section:

-

**Bribery and Corruption**

-

**Gifts and Invitations**

-

**Political Activities**

# Bribery and Corruption

At Clariant, we conduct our business with honesty and integrity. We do not seek advantages through improper, unfair and illegal means such as bribery.

Recognizing and avoiding bribery and corruption are therefore key to protecting our reputation.

We never bribe, nor do we ever accept bribes or attempt to gain improper advantages out of situations where we are in a position of authority. As a company, we can also be held accountable for the actions of any third-party that represents Clariant. Therefore, it does not matter whether a bribe is paid by us directly or indirectly by a third-party and, as such, we do not let others bribe on our behalf.

We understand the responsibility Clariant has in this regard and we take it very seriously. We do everything we can to prevent bribery or any violation of Anti-Bribery laws and regulations by third-parties who conduct business on our behalf. This includes careful and diligent selection of our business partners by

putting appropriate processes and controls in place and conducting appropriate due diligence.

At Clariant, we do not distinguish between public and private bribery – regardless of whether the bribe takes the form of cash or anything else that is or can be perceived as of value, such as a gift, an employment offer or any other favor.

Before offering or accepting anything of value, we ensure that it is in line with our policies and does not create a conflict of interest for us.

As it is not always easy to fully recognize bribery and corruption, we always seek further guidance from Legal or Compliance in case of doubts.

Bribery represents a criminal offense and, in some jurisdictions, companies and individuals can equally be held liable with high fines. Individuals may additionally face a prison sentence.

## **Corruption**

Abuse of a position of employment, authority or trust to gain an improper advantage.

## **Bribery**

Anything of value offered, promised, given, rewarded or provided in order to gain a commercial, contractual, regulatory or personal advantage. Public bribery is directed at a public officer, employee or person in a position of public authority, whereas private bribery is a form of corruption which does not necessarily involve public officials or facilities.

## **Public official**

A public official is:

- any officer or employee of a government; or
- any department, agency, or instrumentality thereof; or
- of a public international organization, or
- any person acting in an official capacity for or on behalf of any such government, department, agency, or instrumentality, or for or on behalf of any such public international organization.

This includes related parties such as family members, spouses, close friends and any person sharing the household with a public official.

### **→ See also**

Accurate Books and Records  
Charitable Contributions, Sponsorships  
and Corporate Citizenship Activities  
Conflicts of Interest  
Fraud  
Money Laundering

# 1

## Learning aid

### Question:

At the airport the immigration process is described transparently, and the visa stamp is free. Nevertheless, I am asked to pay a small fee for the visa stamp and everybody is paying. Should I pay as well?

### Answer:

A facilitation payment (also referred to as “grease” or “speed-up” fee) is a small payment made to a public official in order to receive a service you are legally entitled to. Whenever you are asked for an extra payment that you think may be a facilitation payment, you should contact Compliance or Legal before paying it. Ensure you are well prepared and know the requirements when travelling to destinations that require a visa.

# 2

## Learning aid

### Question:

I recently joined the company and whilst getting familiar with local practices, my supervisor told me that she had offered a job to the nephew of a public official as it helped with resolving an issue with a pending local permit. I don't think this is right, but I also do not want to intervene as I am still quite new to the company. Is there anything I can do?

### Answer:

The supervisor's behavior is illegal and can put our company's reputation at risk. You should immediately speak up about your observations to a member of Compliance.

# 3

## Learning aid

### Question:

Whilst on a business trip, I get pulled over by a local police officer. He claims that I was speeding, although I am very sure that I was not. He says that if I pay him cash, he can let me go and – with threatening gestures – makes clear that I do not really have an option. I am afraid to get hurt if I do not pay him. What shall I do?

### Answer:

In emergency situations involving an imminent threat to health, safety or physical welfare, payments are allowed. Report the incident immediately to your supervisor and to Compliance.

# Gifts and Entertainment

**Gifts, entertainment and other grants are part of many cultures and represent – up to a certain value – common business practices and symbols of appreciation. But there are limits. We must always preserve our impartiality in business conduct.**

**Gifts and invitations should always be reasonable in value and in relation to the business being conducted. Giving gifts and entertainment should also not occur frequently.**



**Gifts or invitations should not have the intention to improperly influence an independent decision-making process, create a sense of obligation or harm Clariant's interests. Such gifts and invitations are prohibited.**

**There may be situations where Clariant's policies prohibit us from accepting a gift, but where local cultural habits would make refusing the gift insulting. If lawful, we may accept the gift but should communicate to the donor that the gift is received for Clariant and not for our personal benefit. Please immediately consult with a member of Compliance to decide about the further use of the item.**

## **Gift**

Goods, services or other tokens of appreciation given in a transparent manner, as a mark of friendship or respect. They are explicitly given without expectation of consideration or value in return. Gifts are used for enhancing relations or promoting the giving company's brand by incorporating a logo or message on a promotional item.

## **Entertainment**

Includes entertaining, meals, receptions, tickets to entertainment, social or sports events, participation in sporting events, such activities being given or received to initiate or develop relationships between business people. If the giver of the hospitality or its representative does not attend and act as host, such entertainment shall be treated as a gift. Spouses or other family members will be excluded from entertainment in any business context related to Clariant and associated invitations must be turned down.

### **→ Policies**

Policy on Accepting Gifts and Invitations

### **→ See also**

Conflicts of Interest

**Gifts and entertainment that are given or received should always**

- **be reasonable in value;**
- **be infrequent;**
- **satisfy a reasonable business purpose;**
- **be consistent with acceptable business practices and only offered if the receiver's Code of Conduct allows it;**
- **of good taste and culturally acceptable.**

**Gifts and entertainment must be avoided or rejected if they**

- **reflect poorly on or embarrass Clariant;**
- **could be categorized as adult entertainment;**
- **are extravagant or may be perceived as extravagant by others;**
- **are cash or a cash equivalent such as a gift card, check loan, stock or item with excessive financial or in-kind advantages;**
- **are provided upon request;**
- **are given secretly;**
- **are designed or perceived to influence the performance of work or public duties;**
- **coincide in time with business decisions whereby timing could appear to be an attempt to improperly influence business judgment;**

# Political Activities

**As a responsible corporate actor, Clariant aims to ensure an open, transparent dialog with politicians, authorities, business associations, as well as non-government organizations in relevant policy areas.**

**Any political contributions, including monetary contributions to political parties, politicians or related organizations, on behalf of Clariant, as well as using work time or other company assets for personal political activity are prohibited. Employees are allowed to engage in relationship building or lobbying for Clariant with policymakers and authorities in full compliance with our policies, namely our Anti-Bribery and Corruption policy.**

## **Political activity**

A political activity is any interaction with a policy-maker, or a stakeholder related to policymaking, with the objective to contribute to the development of policies or other involvement in the public policy dialogue.

### **→ See also**

Charitable Contributions, Sponsorships  
and Corporate Citizenship Activities  
Conflicts of Interest

# 1

## Learning aid

### Question:

I have been a member of a local liberal party for many years. Now that I have joined Clariant, do I need permission from the company to continue my engagement?

### Answer:

No, you do not need permission. Clariant does not prohibit employees' individual participation in political activities as long as they are taking place outside of working hours, remain a private engagement and do not conflict with or negatively impact your ability to perform your job. If in doubt, it is always advisable to be transparent and inform your manager and / or HR in writing about such activities.

# 2

## Learning aid

### Question:

I am a site manager and for a factory construction project I have regular interactions with the local environmental protection agency. Is that a political activity?

### Answer:

As a site manager, it is part of your job to engage with local elected officials as needed. In this situation, any engagement needs to be aligned with the relevant Region Head and Regional/ Corporate Environment, Safety and Health Affairs (ESHA).

# 3

## Learning aid

### Question:

I have a need to engage with a broader range of politicians in order to educate on and promote the idea of a new technology in a site that is going to be built. Am I allowed to engage with a lobbyist?

### Answer:

Whenever you decide to engage a third-party (such as a consulting or a lobbying firm) and allocate or mandate – on behalf of Clariant – a mission involving lobbying activities or contacts with policy-makers, you need to get prior approval by the Ethics and Risk Management Committee (ERMC) before entering any relationship. This will be reviewed by Group Innovation and Sustainability (GIS) and Compliance.

# **We Care about Our Community and Behave as a Good Corporate Citizen**

At Clariant, we recognize that our impact goes beyond our own operations and take this into consideration when making decisions. In the communities in which we operate we maintain respectful relations. We are committed to improving our impact on people, planet and performance throughout the entire value chain.

In this section:

- **Respecting Human Rights**
- **Charitable Contributions, Sponsorships and Corporate Citizenship Activities**
- **Conflicts of Interest**

# Respecting Human Rights

**At Clariant, we protect, respect and promote human rights throughout Clariant's entire operational processes, supply chains and in projects undertaken in our communities.**

**Furthermore, we acknowledge and adhere to internationally recognized human rights standards such as the UN Guiding Principles on Business and Human Rights, the International Bill of Rights, the Universal Declaration of Human Rights, the UN Global Compact, and the four basic principles (cf. labor rights) of the International Labor Organization.**

**→ See also**

Treatment of People  
Respecting Labor Rights

# Charitable Contributions, Sponsorships and Corporate Citizenship Activities

Clariant wants to be an honorable corporate citizen and make a positive impact on the communities in which it operates.

Employees are encouraged to engage with their local communities on a voluntary basis. Clariant supports the use of company resources to contribute locally through volunteering and other related activities.



**We ensure that all community activities conducted on behalf of Clariant or with Clariant resources are conducted in the correct manner according to our strategy and approved by the right level of authority within Clariant. This includes review by Compliance where necessary.**

## **Charitable donations**

Charitable donations are voluntary third-party contributions, made in good faith, e.g. Clariant is neither paid nor receives anything tangible in return. Charitable donations can be made in the form of a monetary contribution, a donation in kind (e.g. free samples of Clariant products), or a contribution of voluntary employee working hours. A contribution is still considered a charitable donation if Clariant is offered something in return that it did not seek or that has no or little value to the company.

## **Sponsorships**

Sponsorships are any Clariant contributions in money or in kind to an event organized by a third-party in return for the opportunity to advertise Clariant or its brands. Such an activity may be a display of the Clariant logo, reference to Clariant in the opening or closing address of an event, or the participation of a speaker in a discussion panel as well as tickets to the event concerned.

→ **See also**

Bribery and Corruption

# 1

## **Learning aid**

### **Question:**

I am a member of a local charity organization. We plan an event to collect funds. I was wondering whether I should contact Clariant's suppliers using my Clariant letterhead to invite them to contribute with a charitable donation. Can I do that?

### **Answer:**

No. You cannot use Clariant's name for a private activity as it may leave the impression of a conflict of interest – even if it is for a charitable cause. If you know of a charitable organization where a contribution from Clariant may add value, you should inform yourself about the process described in the Corporate Citizenship Management Policy and reach out to your Group Innovation and Sustainability (GIS) manager with any questions.

# Conflicts of Interest

**At Clariant, we promote entrepreneurial thinking. Each of us always acts in the best interest of the company. This will help us achieve the best results and build respect among our stakeholders.**

**Therefore, we will make sure to avoid any situation in which our personal interests influence, or appear to influence, our ability to act in the best interest of Clariant and its business. In any case, we disclose conflicts of interest or potential conflicts of interest, so they may be resolved.**

## Conflict of interest

A conflict of interest is a situation in which a personal interest of an employee conflicts with those of Clariant. This may include, but is not limited to, the following indicative situations.

- Family or personal interests with business partners where the employee or the employee's family benefits or seeks personal benefits from Clariant's business relationships with its customers or other business partners.
- Financial interests in other organizations where the employee's personal investments put or might put the employee in competition with Clariant.
- Private personal relationships within the company that become a disruption to the workplace or where the individuals involved work within the same reporting line or where one has decision authority or influence over the other.
- Employments outside Clariant that negatively affect Clariant's business relationships with customers or other business partners or where worktime and any other Clariant asset is used to conduct outside business activity.
- Board appointments within other companies;
- Business opportunities for personal gain or benefit with the knowledge and information gained from the Clariant employment.

### → See also

Bribery and Corruption  
Fraud

# 1

## Learning aid

### Question:

We are looking for a new supplier and a good friend of mine owns a business that I think could be the perfect fit for what we need. I am aware that there might be a potential conflict of interest because of my friendship, but does this mean that we cannot consider his company during the bidding process?

### Answer:

No, this does not mean that your friend's company is per se excluded from the bidding process. If a conflict of interest arises, you should inform your supervisor and someone from Compliance so that the situation can be assessed, and the appropriate measures put in place. You can propose your friend's firm as a bidder but should step out of the decision-making process to eliminate any potential of a conflict of interest or a perceived conflict of interest.

# 2

## Learning aid

### Question:

We are tendering for a new travel agency and among the quotes there is one agency which stands out because of its competitive offer. Whilst meeting them, they offer me and my family a 50% discount on our next vacation if, in return, they win the mandate from Clariant. We will very likely choose this agency anyway, so it wouldn't matter if I accepted this offer – correct?

### Answer:

No, this is not correct. Even if the agency turns out to be the best fit for Clariant, for someone outside the company, this leaves the impression that you allowed objective decision-making to be influenced by this offer, to gain a personal benefit from it. This would make you and Clariant look corrupt and that could seriously harm our reputation. If you have alternative travel agencies to work with, you should refuse this offer and immediately report this to your supervisor and someone from Compliance.

# **We Handle Information with Care**

**At Clariant, we are aware of the importance of protecting and handling information appropriately. Our financial statements reflect the information accurately and truthfully. Each of us is individually responsible for ensuring that we maintain information accurately and truthfully and in line with all applicable laws and standards, as well as internal policies and procedures.**

**In this section:**

**-**

**Information Security**

**-**

**Data Privacy**

**-**

**Accurate Books and Records**

# Information Security

For Clariant, information is highly valuable. That is why we see information as an asset that needs to be protected with regard to integrity, confidentiality and availability. In addition, we have obligations toward our shareholders, employees and customers to safeguard any information we store about them.

As a rule, we should only use company information for approved company purposes. We classify information according to our internal policies and we do not disclose any information outside the company unless it is classified as 'public' or has been approved by an authorized person.

Given the sensitivity, we will apply additional care and protection to confidential information. We have to ensure that such information is only accessible to those who have explicitly been given permission to have it and who need it to do their job. This also means that we do not disclose any confidential information to our family members or other persons living in the same household, to our friends or to uninvolved colleagues.

## Confidential information

Confidential information includes, but is not limited to, information on Clariant's business activities, technology, intellectual property, financial position and employees, as well as all information on Clariant's customers, suppliers and business partners. Clariant's intellectual property includes not only trade secrets, patents, trademarks and copyrights, but also business, marketing and service plans, as well as technical knowledge.

### → See also

- Insider Trading
- Intellectual Property
- Fair Competition
- Media Relations and Investor Relations

# 1

## Learning aid

### Question:

Whilst commuting to work, I overhear a phone conversation a couple of seats behind me in the train. The woman seems to be talking about Clariant and, at some point, I hear that she discloses confidential information about Clariant's future strategy. It makes me feel uncomfortable. Should I intervene?

### Answer:

Yes, if the situation allows, you should politely interrupt her and tell her that others can hear her and ask her to refrain from sharing business information in public. In any case, you should inform someone from Compliance about this incident. Information about Clariant's business strategy qualifies as a trade secret and must therefore be kept strictly confidential.

# Data Privacy



**Privacy and the protection of personal data is a fundamental right. At Clariant, protecting the personal data of our employees, customers, vendors and other stakeholders is a critical priority, especially in an environment of fast developing communication and information technologies.**

**We keep private things private. We collect, use, disclose and store only the minimum amount of personal data that is necessary for us to achieve the legitimate purpose for which it was initially obtained.**

**We retain personal data only for as long as it is necessary for its processing purpose and apply maximum protection to any personal data that we process.**

**We comply with applicable laws and regulations within all jurisdictions in which we collect, store and use personal information. If we witness or are part of a data privacy incident, we report it immediately to Group Privacy, HR or Legal.**

## Personal data

Personal data is any information relating to an identified or identifiable person.

### → See also

Treatment of People  
Social Media  
Electronic Resources

# 1

## Learning aid

### Question:

I am asked by a senior manager outside of my team to provide him with a very detailed report containing a range of personal data related to Clariant's employees. I am not sure what he needs the data for. Shall I ask for an explanation?

### Answer:

Yes. If you have access to personal data, you have the responsibility to protect it against unlawful use. According to our policies, there must be a legitimate purpose for processing personal data. If the requestor cannot provide any, or if you are unsure whether a legitimate purpose is given, seek advice from Group Privacy.

# 2

## Learning aid

### Question:

I am involved in the recruitment of a new team member and share a list of preferred candidates with those colleagues involved in the process. Later I notice in my sent items that, by accident, I included an external supplier in the distribution list of my e-mail. What should I do?

### Answer:

You should immediately write to the supplier and inform them that they were not intended to receive this e-mail. Kindly ask them to delete the e-mail and keep the information confidential. Furthermore, you should report the incident to Group Privacy.

# Accurate Books and Records

Clariant's records must be complete, truthful, correct, timely, accurate and clear.

It is our responsibility to ensure that effective processes and internal controls are in place for periodic financial statements and corresponding financial reporting and communication, as well as the publication of matters that are subject to disclosure requirements.

This includes compliance with local legal regulations such as financial reporting principles as well as IFRS (International Financial Reporting Standards), which are the basis for Clariant's financial reporting. The Group's own internal bookkeeping processes must also be adhered to. Under no circumstances must our reporting be deceptive – be it aimed internally within Clariant or externally.

→ **See also**

- Fraud
- Bribery and Corruption
- Information Security
- Insider Trading

# 1

## Learning aid

### Question:

To make best use of the remaining budget close to year-end, I was wondering whether I could ask our consultants to bill some of the next year's services immediately?

### Answer:

Clariant's books and records will be kept in accordance with the accrual principle, which requires that transactions are recognized when they occur. Therefore, we cannot account for services in a different period than they are rendered.

# 2

## Learning aid

### Question:

My supervisor approaches me with an invoice that needs to be paid urgently. He asks me to surpass the purchase order process and tell the colleagues in Finance that this is a special order from him directly. Shall I follow his instructions?

### Answer:

Clariant's payment procedures apply to everyone equally. Even in urgent cases, invoices cannot be booked on "special order" by a supervisor. Generally, a purchase order has to be in place. If your supervisor insists on ignoring this process, you should speak up and consult Procurement, Finance or Compliance.

# 3

## Learning aid

### Question:

A supplier reaches out to me via e-mail, informing me about an overdue invoice. They also share updated bank details with me to be used for the payment. I don't know how to manage changes in bank details. What should I do?

### Answer:

You should get in touch with someone from Finance to evaluate whether any background checks are necessary. Beneficiary bank account changes in our system follow strict internal procedures to ensure they are reflected correctly in Clariant's books and to mitigate the risk of fraud attempts.

# **We Com- municate Responsibly**

**Communication is essential. As a global employer and a publicly traded company, we know about the significance of our communication. We communicate in a fact-based, timely way to our stakeholders, in line with the applicable laws and regulations and our own internal guidelines.**

**In this section:**

**-**

**Social Media**

**-**

**Media Relations and Investor Relations**

# Social Media

**Social media offers opportunities to support communication and collaboration internally as well as with external partners. Clariant supports the active usage of social media, particularly when such activity adds value to Clariant.**



**When we are personally active on social media and speak about Clariant, we need to be mindful of the company's reputation. Therefore, we do not disclose any confidential or internal information on social media and we make it clear that we are not a company spokesperson.**

**We are polite and do not harass anybody. Engaging in offensive or controversial conversations on our private accounts while having Clariant listed as our employer could result in disciplinary action.**

**We do not post content or personal opinions about an ongoing issue related to Clariant, a public debate, or crisis before checking with Group Communications, Legal, HR or our local HR manager, since readers might interpret this as an official Clariant statement.**

**→ See also**

Information Security  
Insider Trading  
Electronic Resources

## We should all be aware of Clariant's Social Media Ground Rules:

- **be polite,**  
do not harass or offend people – everything that goes online stays online forever;
- **do not disclose confidential or internal information;**
- **speak for yourself,**  
make it clear that you are not a company spokesperson;
- **do not respond to customer, investor or media questions,**  
Clariant's experts take care of that;
- **protect the brand,**  
do not use Clariant branding or logos on your personal feed or content;
- **do not violate copyrights,**  
ensure you have rights to or give credit to everything you post;

**Appropriate engagement on social media is welcomed. Feel free to engage whenever something public can be shared, for example, a team event or public information about a product.**

**When following these rules, you can always tag Clariant's account (@Clariant) in your posts or add the hashtag #Clariant. We also encourage you to retweet, share and comment on content posted by our official company accounts.**

# **Media Relations and Investor Relations**

**Clariant pursues open and transparent communications with external stakeholders while adhering to legal and business obligations.**

**We communicate according to a one-voice-policy and ensure that non-public information remains non-public. Therefore, it is important that only designated spokespeople provide statements to media or the financial markets on behalf of the company. Spokespeople are authorized either by Group Communications or Investor Relations.**

**If we receive media inquiries, we forward them to Group Communications for further handling. Inquiries from the financial community can only be answered by Investor Relations.**

## Financial community

Any person / persons and organizations that do business in a financial market.

## Owned and earned media

Owned media, the contents of which are in Clariant's control, e.g. Clariant.com, our intranet and our own social media channels. Earned media are independent media and Clariant has no direct influence over their editorial content.

### → See also

- Gifts & Entertainment
- Information Security
- Insider Trading
- Social Media

# 1

## Learning aid

### Question:

I am at a friend's birthday party where I get into a conversation with her cousin, who turns out to be a local journalist. As we talk about work, he asks me about Clariant's future strategy. As this is a private event, I assume I can trust my friend's cousin, so I can give him some insights, right?

### Answer:

No, you should not share any internal and potentially sensitive information with someone outside the company, especially journalists. Tell him that you are not allowed to share this kind of information and that he can reach out to Clariant Media Relations.

# 2

## Learning aid

### Question:

A journalist from an online magazine sends me a very positive article about Clariant in an e-mail, saying that he would like to publish it in one of the next editions if I, in return, buy an advertisement for Clariant with their magazine. Should I agree?

### Answer:

If this article can only be published based on a return service, this is considered paid public relations. Clariant does not involve itself in paid public relations. Therefore, you should forward the e-mail to Clariant Media Relations without replying to the journalist.

# **We Take Care of Our Resources**

We treat Clariant's assets as if they were our own and we respect the company's rules on usage thereof. We know that Clariant's intellectual property is the innovative competitive edge that the company needs to perform and further develop and, as such, we apply the utmost protection to it.

In this section:

-

**Business Assets**

-

**Electronic Resources**

-

**Intellectual Property**

# Business Assets

Each of us has the duty to take care of Clariant's business assets. We will protect them from loss, damage, misuse, theft, misappropriation or destruction. Business assets may only be used for business purposes unless further specified in this Code of Ethics or in a specific policy.

We invest, operate and dispose of Clariant's equipment, machinery, other technical installations and facilities as well as vehicles in a proper and transparent manner and in Clariant's best interest. We manage and spend Clariant's money wisely, economically and as if it was our own.

→ **See also**  
Information Security

## 1

### Learning aid

#### Question:

I am an employee and would like to buy a company car for my private use. Is this okay?

#### Answer:

Local policies will apply to all sales of company assets respecting the ground rules of a transparent process, equal availability to all employees and a fair value market price. If several employees are interested in buying the asset, local management will ensure an open and clear selection process.

## 2

### Learning aid

#### Question:

Clariant is clearing out its old equipment. A former colleague approaches you and asks if you could do a favor for him as he would like to buy the old equipment for a favorable price. Is this okay?

#### Answer:

When you receive such proposals inform your line manager or Legal. You should follow a clearance process that ensures the highest possible price in the best interest of Clariant.

# Electronic Resources

**Clariant's electronic resources are for Clariant business. This includes computers, notebooks, office and mobile phones, tablets, software, systems, networks and all peripheral equipment.**

**We use Clariant's electronic resources responsibly, lawfully and ethically and take care of them as if they were our own. We protect Clariant's electronic resources from unauthorized use and security threats. This means that we do not visit unlawful sites, open suspicious documents, copy any Clariant software protected by a license agreement for private purposes, or install private software at the workplace. Furthermore, we do not use Clariant's electronic resources for outside business ventures or personal financial gain.**

**Searching, downloading, or forwarding information with content of a racist or pornographic nature or glorifying violence is regarded as particularly abusive, is strictly prohibited and may be deemed criminal activity in some jurisdictions.**

**→ See also**

Information Security  
Insider Trading  
Harassment

# Intellectual Property

**Clariant's innovations are at the heart of our company's success and they are an outcome of many years of hard work and significant investment. As an innovation-driven company, intellectual property rights are key assets that secure and distinguish our business.**

**We apply the utmost and best possible protection to our intellectual property as it is the competitive edge we need to succeed. We defend our intellectual property rights against violations and we respect the valid intellectual property rights of third-parties.**



## Intellectual property

Intellectual property rights include, in particular, patents, trademarks and know-how. The names of our products and services as well as our corporate brands are registered as trademarks in many countries and distinguish our portfolio. Technical innovation can be secured via patents. Patents are granted and registered by national patent offices and provide its owner with the right to exclude others from making, using or selling the patented invention. In acquiring, developing and applying expertise and skills in research and development (R&D) and operations, we generate know-how which must be kept secret and is a determining factor of our performance and competitiveness in the market.

### → See also

Information Security  
Insider Trading

# 1

## Learning aid

### Question:

In my job, I do not have anything to do with Clariant's intellectual property rights. They are more important for Group Intellectual Property Management, Group Technology & Innovation, and business research functions and do not affect me – right?

### Answer:

This is not correct. For an innovation-driven company like Clariant, intellectual property is a key asset needed to secure and distinguish our business. As such, they have an impact on everyone. You can support the organization by speaking up if you become aware of a potential violation of our intellectual property rights or if you think you have invented something potentially valuable to Clariant. Also, don't forget to keep Clariant's know-how strictly confidential.

## **CLARIANT INTERNATIONAL LTD**

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