



SYENSQO

Code of Business Integrity

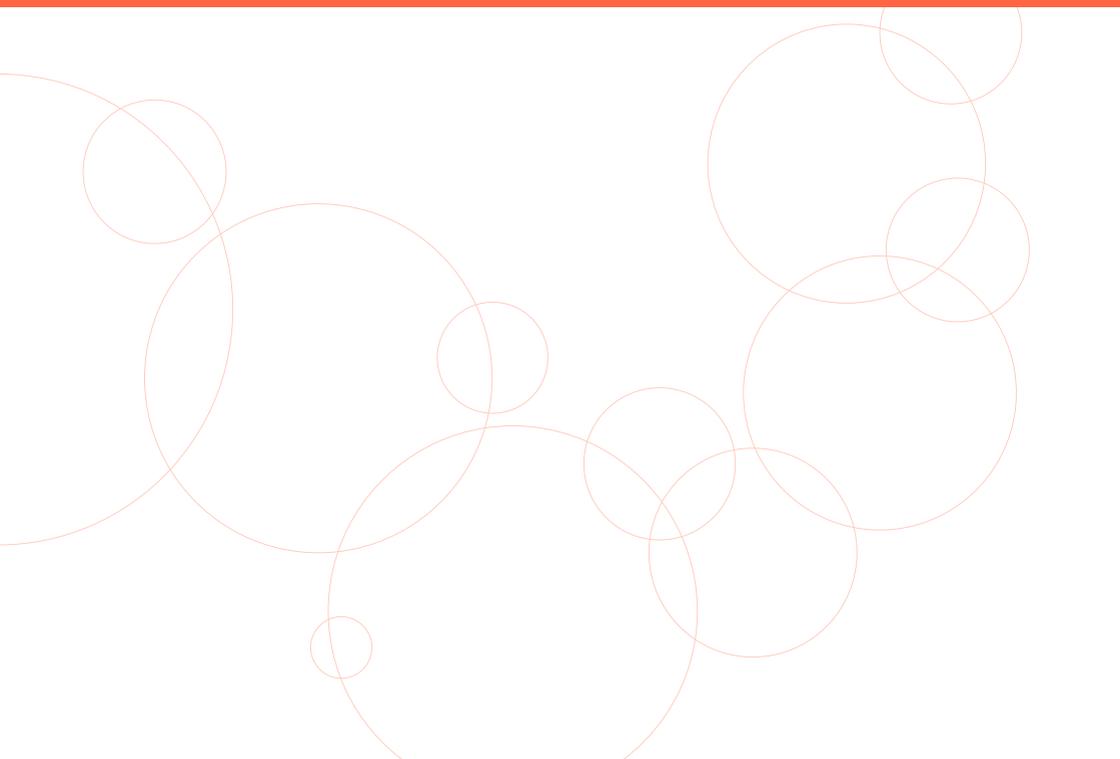


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Message from the CEO



Dear all,
I consider integrity a non-negotiable priority: it is the ONLY way to do business, and it is my expectation of everyone at Syensqo.

That is why our first Core Belief is **Purposeful Responsibility**: our unwavering commitment to operate with a profound attention to ethics, safety and sustainability. It underpins our very purpose: bonding people, ideas and elements to reinvent progress. We can only be trusted to have this positive impact on society if we first and always -- always -- hold ourselves to the highest ethical standards, operating within firm guardrails that go beyond compliance.

The Syensqo Code of Business Integrity is based on a strong tradition of values that are historically rooted in our Group culture. Just as we reinvent technological progress through our science, we must periodically review and reconsider our moral guidelines as societies move forward. This latest Code introduces further clarification in areas we as a society and as individuals understand differently or better today than in the past. Such areas include Human Rights, Inclusion and Diversity, and eradicating harassment -- all of which are close to my heart personally and are also capturing critical attention in societies around the world. These areas in particular embody our second Core Belief, **Unity, Not Uniformity**. We value and respect every human life and have our greatest impact as individuals when we work together, overcoming our unconscious biases that can block the potential contribution of colleagues.

While each of us is absolutely expected to observe applicable laws and regulations, every single Group employee must also go further to obey this Code, which is the cornerstone of our Ethics and Business Integrity program. We are all individually responsible for protecting the business and reputation of Syensqo. We do this in the spirit of our third Core Belief, **Passion for Performance**, which recognizes our ambition to go beyond basic expectations and bring original thinking to old problems. Passion for Performance does not mean achieving results at any cost: our first performance imperative is performing to our ethical code.

Through flawless integrity and ethics, not only do we live in accordance with our Core Beliefs, but we also collectively contribute to the future of our Group. This Code affirms fundamental principles and provides more explicit guidance about what to do and what not to do. It sets out the precepts to follow when we are confronted with difficult choices. But at the end of the day, it cannot cover every situation you will face. You will need to use your judgment.

If you need any clarification or if you believe that non-compliance issues are occurring at Syensqo, you should come forward and speak up, using the most appropriate channel - talk to a manager, HR, Ethics & Business Integrity colleagues, or contact the anonymous Syensqo Ethics Helpline.

Together we will raise the bar on ethical conduct and reinforce the greatest possible trust in the Syensqo group.

Be safe,
Ilham Kadri
Chief Executive Officer



Introduction

Expectations

The Code of Business Integrity is the foundation for how we operate as a Group. It applies to every Syensqo employee wherever Syensqo operates or conducts its business, and to all third parties acting on Syensqo's behalf.

We are all responsible for reading, understanding, and following our Code of Business Integrity and the related policies and procedures. In order to comply with the Code of Business Integrity, we should promptly complete all assigned Ethics & Compliance training, seek advice when things are not clear, and promptly report anything that may violate the Code or the related policies and procedures.

The Code of Business Integrity cannot cover every single situation, but we should use our good judgement and common sense to make sure we are operating under the spirit of the Code at all times.

We are expected to fully cooperate with all investigations and audits. All information provided must be true, clear, and complete.

Our Role

We are responsible for communicating within our teams the importance of ethical behavior consistent with our Code of Business Integrity and for ensuring that our teams receive all necessary training on the Code of Business Integrity and all related policies and procedures.

We are expected to create an environment within our teams where every member feels free to raise good faith concerns about possible violations of the Code of Business Integrity and its related policies and procedures. Should actual violations be observed, each team member must also understand his or her duty to Speak Up.

We must take action immediately to address any such situations, and we should report such situations to our supervisor,

the Ethics & Compliance department, Legal, or Human Resources. In no event, shall we or any member of our team punish or take any retaliatory action against anyone who exercises the right to Speak Up in good faith.

If you are a leader at Syensqo, **you are expected to be a role model for our culture.** Your words and actions must exemplify our core values and create an environment where the Syensqo culture can flourish.

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How to Speak Up

The first and best place for employees to Speak Up is with their individual manager or supervisor. In fact, part of the manager/supervisor's job is to listen to employees, understand their questions and concerns, and act on them appropriately.

In addition, employees may seek help from:



any other manager or supervisor;



a member of the HR



a member of the Legal Department



the regional Compliance Officer



any member of the Internal Audit Department; or



their employees' representative

In cases of serious breach, employees may speak directly with the Chief Compliance Officer or the Group General Counsel. As an alternative, employees may wish to use the Ethics Helpline, maintained by a private third party and operated in accordance with local law.

No matter how concerns are reported – whether anonymously where legally permitted or by name, in person, or through the Syensqo Ethics Helpline – employees can be assured confidentiality will be maintained to every extent possible. Limited disclosures will be made only to facilitate investigation or where required by law. All reports will be investigated and all investigations will be conducted independently, in a manner that reflects Syensqo's values and will respect the rights of all parties involved and applicable laws.



No Retaliation

Adherence to Group values by employees implies adherence to this Code of Business Integrity. The Group encourages every employee to speak up for what is right when something is wrong.

In no event shall an employee who makes a report be subject to retaliation. No action will be taken against an employee who expresses a concern that is found to be inaccurate if the concern is expressed in good faith. On the other hand, false or abusive accusations will not be tolerated and may result in disciplinary action.

Independent Compliance Function

At Syensqo there is an independent department to manage and oversee the deployment of the Code of Business Integrity and the accompanying Ethics & Compliance program. This Ethics & Compliance department consists of regional compliance officers – who are in-house lawyers - under the direction of the Chief Compliance Officer. This department is responsible for investigating, either alone or with the assistance of other departments, all reports that have been brought to their attention. The Chief Compliance Officer reports to the Chief People Officer and annually reports all acts of non-compliance concerning the Syensqo Code of Business Integrity and the related policies and procedures, including Speak Up cases, to the Executive Committee and the Board of Directors Audit Committee.



Ethics and Integrity in the Workplace

Health and Safety in the Workplace

High safety standards and the constant improvement thereof are an integral part of the Syensqo work ethic and commitment. The Group provides safe and healthy working conditions on its sites for both its employees and contractors and recognizes the need for an appropriate work-life balance. Each employee is expected to contribute to the safety of the workplace by being alert and aware of the rules, policies, and procedures, and by reporting any unsafe condition.

Inclusion, Diversity, and Non-Discrimination

An inclusive workplace promotes openness, respect, and welcomes individual perspective. Syensqo values and respects all of its employees for their diversity, visible and invisible differences, thoughts and beliefs, experiences and backgrounds, and unique ability to contribute to a growing, sustainable, and winning enterprise. We are committed to a working environment that promotes equal opportunity and diversity and inclusion at every level of employment.

All employees should respect one another and fulfill the Group's objectives collectively and collaboratively without



Q: I have heard that a colleague on my team has a higher salary than I have, and I am worried that my gender plays a role in the pay disparity. Does Syensqo pay male and female employees the same?

A: Syensqo is committed to treating all employees equally without regard to race, ethnicity, religion, national origin, color, gender, gender identity, sexual orientation, disability, age, political opinion, family status, or any other basis. Syensqo's policy on fair pay falls within this commitment. Individual salaries even for similar job categories can vary based on experience and the individual's overall performance. Our human resource managers review job classifications and grade levels on a regular basis with members of management to ensure fairness in the Group's merit-based remuneration process.

regard to race, ethnicity, religion, national origin, color, gender, gender identity, sexual orientation, disability, age, political opinion, family status, or any other basis. Discrimination, which is the unfair treatment of employees based on prejudices, will not be tolerated.



Q: I have special needs and my boss assigns me certain activities that go beyond my physical and motor conditions to perform this activity. What should I do about this situation?

A: Speak with your manager and discuss a reasonable accommodation for your physical limitations. Should the issue not be resolved, you should follow the guidelines in the Code of Business Integrity and speak up to ensure that Syensqo's policy of non-discrimination is being honored.

Q: The manager of the GBU I work in continually demonstrates a hostile attitude toward the women in our department. When assigning tasks he passes the highly complex activities to the men in the department and saves the more routine, simple tasks for the women. I've heard him say that "women do not have the capacity for complex assignments." What should I do in this situation?

A: Comments showing gender-based bias must be brought to the attention of management. If your manager is the person making the comments, go to your Human Resources representative or use the Syensqo Helpline to report your claim directly to your Regional Compliance Officer. Statements or comments showing preference for a particular gender in the work of Syensqo is not tolerated. Work assignments must be made fairly and without regard to any belief about a person's limitations based on his or her protected status.

Q: I have often been the target of offensive comments related to my sexual identity and feel embarrassed. What should I do in this situation?

A: Syensqo does not tolerate this type of behavior and strives to maintain a harassment-free work environment for all its employees without regard to ethnicity, age, function, gender, gender identity, appearance, religion, country of origin, sexual orientation, marital status, dependents, disability, social class, or political views. Any conduct that conflicts with this policy must be reported. You may speak with your manager, your Human Resources Representative, or your Regional Compliance Officer.

Harassment-Free Environment

We strive to maintain a safe, stimulating, and harassment-free workplace. Harassment is any conduct with the purpose or effect of violating the dignity of a person or creating an intimidating, hostile, degrading, humiliating, bullying, or offensive work environment. Harassment can be moral or sexual in nature.

Moral harassment can be defined as any repeated abusive conduct, in particular behavior, words, actions, gestures, texts, or images, capable of violating the personality, dignity, or physical or psychological integrity of a person, jeopardizing their employment, or deteriorating the working environment.

Sexual harassment can be defined as any unwelcome sexual advance, unwelcome request for sexual favors or other unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated, where a reasonable person would anticipate that reaction in the circumstances.

Any form of harassment in the workplace, whether moral or sexual, physical, verbal, or non-verbal, is strictly prohibited.

Harassment can take the following forms:



Verbal forms

of harassment, such as intimidating, demeaning, inappropriate, aggressive, or offensive comments or jokes, insults, or threats.



Physical forms

of harassment, such as physical attacks including hitting, kicking, shoving, pushing, impeding or blocking movement; threatening behavior or unwanted contact or sexual advances, ranging from unsolicited touching, caressing, hugging, or kissing to assault or rape.



Non-verbal forms

of harassment such as offensive, intimidating, or inappropriate gestures, indecent exposure, and lascivious looks. It also includes the unwelcome display of suggestive materials and objects, screen savers, or posters as well as suggestive e-mails, notes, or text messages, or threatening images.



Q: I am interested in asking a colleague out on a date, but am concerned that it will be construed as harassment if the person is not interested in me. Is it allowable to ask another employee on a date without being in violation of the Code of Business Integrity?

A: Syensqo does not prohibit its employees from dating unless one of the employees directly supervises and/or manages the other employee. If you ask a colleague out on a date, be sure that you do so in a respectful manner. Should the person decline, accept the answer as final and leave the thought behind. Harassment occurs when repeated requests for personal relations are made to a person who has already articulated non-interest.

Q: My boss recently asked me to go out on a date after work. I am up for a promotion soon, and I am worried that if I do not go out on the date, I will not get my promotion. What should I do?

A: Syensqo does not approve of dating between managers and members of their teams for several reasons. You have articulated Syensqo's primary concern with such liaisons. An employee should never feel that he or she must acquiesce to a request to engage in a personal relationship with his or her manager in order to progress within the Group. All managers receive this training and should not place you in such a position. You should decline the invitation, and you should bring the matter to the attention of your Human Resources representative expressing your concern. Your manager will be reminded of our policies, including our non-retaliation policy for speaking up.



Q: Is physical contact necessary to characterize sexual harassment?

A: Sexual harassment can take on many forms and does not require physical contact. The conduct may be explicit or subtle, including verbal and non-verbal forms of harassment, as well as physical contact. It can be spoken or be conveyed in written expressions via various types of media, including emails, chats, comments on social networks, or videos. Gestures, gag gifts, or even gifts such as candy and flowers could amount to sexual harassment if they cause the recipient anxiety or discomfort. Should you have additional questions please see your Human Resources representative.

Q: During team meetings my boss often sits with her back toward me and makes faces when I'm talking. Does this constitute moral harassment?

A: Moral harassment can be defined as any repeated abusive conduct, in particular behavior, words, actions, gestures, texts, or images capable of violating the personality, dignity, or physical or psychological integrity of a person, jeopardizing their employment, or deteriorating the working environment. A manager should never engage in conduct which could be reasonably interpreted as constituting moral harassment. The conduct described appears to be in this vein. However, a full investigation of the incident(s) would be necessary to understand the totality of the situation. Use the guidelines in the Code of Business Integrity to Speak Up to your Human Resources representative.

Q: My boss yelled at me in front of everyone in the department during a meeting. This has never happened before, and I found it to be very upsetting. Is this bullying?

A: Syensqo strives to maintain a professional level of dignity and integrity in the work environment. Though everyone may have a bad day on the job, that does not excuse behavior that is intentionally humiliating, embarrassing, psychologically disruptive, or degrading. Tell your manager how you felt. Feedback is meant to be constructive and not to be delivered in a disrespectful manner.

Conflicts of Interest

Principle

Employees shall exercise fair, objective, and impartial judgment in all business dealings, placing the interests of Syensqo over any personal interests in matters relating to the business of the Group. A conflict of interest arises when our own personal interests influence our duty to act in the best interests of Syensqo. We must avoid any situation which creates an actual or potential conflict of interest. Moreover, we are obligated to disclose any potential or actual conflict of interest immediately to our manager, Human Resources, or the Ethics & Compliance department, and we must withdraw from any decision-making process that creates or could be perceived as creating a conflict of interest.

Outside Positions

Although Syensqo respects our personal and private affairs and activities, we should never engage in activities that compete against Syensqo even in our personal time outside of work. We must also exercise caution if we are asked to serve as a director, trustee, or officer for another company or organization, and prior approval must be obtained from our direct manager. No prior approval is required for positions in not-for-profit, charitable, or sports organizations.

Outside Relationships

Doing business on behalf of Syensqo with family members, whether the family member is an actual or potential customer, competitor, or vendor, can create a conflict of interest that must be disclosed immediately. Likewise, we must ensure that any friendships we have outside the Group do not affect our ability to act in the best interest of Syensqo.

Intimate or Familial Relationships

Intimate or familial relationships among colleagues can also create actual or potential conflicts of interest. To avoid these issues, we must avoid having a reporting relationship with a family member or anyone with whom we have been involved in a romantic way. If the situation nevertheless arises, it should be disclosed to Human Resources, and the Group will do its best to take steps to remove any real or perceived situation of conflict of interest.



Q: My brother-in-law owns a company that is bidding on a Syensqo construction project. I am the person in charge of selecting the vendor, and I want to pick my brother-in-law's company because I believe his company will do the best job. Is this a conflict of interest if I have Syensqo's best interest in mind when making the selection?

A: While you may have the best intentions to serve Syensqo's interests, the appearance of a conflict of interest exists in the situation you described. Due to your relationship with the prospective vendor, it may appear that you cannot be objective in the selection process. Remove yourself from the selection process and disclose the relationship to your manager or someone in Compliance or Human Resources.

Q: I have been offered an opportunity to serve on the Board of Directors for a start-up company. The company is not in the chemical industry and does not compete against Syensqo. Am I allowed to serve on the Board of another company?

A: Syensqo does not prohibit its employees from serving on outside Boards of Directors in non-competitive industries, provided prior approval is obtained from the manager and the time required to serve does not interfere with the employee's ability to competently perform the duties of his or her job with Syensqo. You should discuss this appointment with your manager to ensure that the business is, in fact, non-competitive, and that your obligations to Syensqo will not be adversely impacted by your service on the Board.



Q: I am part of the Syensqo engineering team, and I have noted that a department colleague has consistently been late in finishing his tasks and has been away from the workplace for hours without any justification. Invariably I hear him on the telephone buying and selling products that have no relationship to his role at Syensqo. He is jeopardizing the whole team because we depend on him to complete his tasks. What should I do?

A: Your observations about the employee's work habits and their impact on the team's efforts should be raised to your manager. He or she may be aware of some temporary personal situation that requires the employee's absence, the reasons for which have not been shared with the rest of the team. In other words, the absence may have been pre-approved. Your manager should be informed that the repeated absences are adversely affecting the team's performance. The telephone conversations you describe appear to amount to a direct conflict of interest since this work is occurring on Syensqo time using Syensqo equipment, but has no bearing to Syensqo products or business. You should report the matter using the guidelines in the Code of Business Integrity to Speak Up.

Use of Group Assets

Syensqo's success depends on the preservation and integrity of our assets. These assets can be defined as all tangible and intangible things owned by Syensqo and include physical assets (such as facilities, equipment, supplies, inventory, and information technology), intangible assets (such as proprietary information and intellectual property), and resource assets (such as employees' working time). Syensqo's assets may only be used for legitimate business purposes and be dedicated to the pursuit of the Group's interest. Incidental use of certain Syensqo assets for personal purposes is permitted under relevant Group policies if it is not excessive or inappropriate and does not unreasonably restrict the use of the same assets for Syensqo business.

Information Technology

Syensqo provides appropriate Information Technology ("IT"), including computer hardware and mobile devices, in order for us to work in an efficient, secure, and compliant manner. We may use Syensqo's IT for personal use so long as that use is legal, appropriate for the workplace, occasional, not for personal gain, and does not interfere with our job responsibilities. Syensqo prohibits the use of its IT to communicate, view, or access sexually explicit, pornographic, offensive, or unlawful materials or activities (such as terrorism), even if those materials are unsolicited and have been sent to the employee by a third party. Syensqo may, in certain circumstances, in accordance with applicable privacy laws, monitor IT use and may disclose IT use to regulatory agencies or to law enforcement.



Q: Am I allowed to surf the internet on my work computer and mobile device?

A: Incidental use of Syensqo's assets (your Syensqo issued computer and mobile device, for example) for personal purposes is permitted if it is not excessive or inappropriate and does not unreasonably restrict the use of the same assets for Syensqo business.

Confidential Information

We must safeguard Syensqo's Confidential Information, whether it is business sensitive information or intellectual property, as it is vital to the Group's success. Confidential information is any non-public information that, if disclosed, may be helpful to our competitors or may be harmful to Syensqo, our employees, or our customers and business partners. Examples of confidential information include, but are not limited to, sales and marketing data, business and strategic plans, and financial information, as well as know-how or scientific or technical information.

We must take precautions to guard Syensqo's confidential information from disclosure to competitors and other unauthorized third parties. We also must take care to protect the confidential information of third parties (for example, customers and suppliers) which comes into our possession by reason of our positions within Syensqo. We must not disclose any confidential information unless disclosure is authorized or legally mandated.

Should our employment with Syensqo come to an end, we remain bound by our confidentiality obligations.



Q: A former employee contacted me in order to get access to some marketing information she had created while working at Syensqo. I don't feel comfortable sharing this information with her since she is no longer an employee. What should I do?

A: You should tell her that Syensqo's confidential information cannot be shared with non-Syensqo employees even if the same persons were once Syensqo employees and created the work. The work product created during a person's employment with Syensqo belongs to Syensqo both during and after the employment relationship. You should not share this information under any circumstances.

Data Privacy

Syensqo respects the privacy of its customers, suppliers, employees, and all other individuals with whom Syensqo has business interactions. Syensqo complies with all applicable national laws that protect privacy of personal information, including the European Union General Data Protection Regulation and all laws and regulations in the jurisdictions in which Syensqo conducts its business.

An Open Dialogue with Employees

Syensqo is committed to maintaining trusting and constructive relations between its employees and their representatives. This exchange is particularly important as the employees are the key players in Syensqo's responsible performance. Syensqo encourages dialogue between employees, their representatives, and management to assist employees in identifying actual or potential situations that might lead to a violation of the Code and finding solutions to prevent such situations.

Communication with the Public / Use of Social Media

Although Syensqo respects the private lives and social relations of its employees, any public reference to the Group or its employees, personally or through any social media, must be consistent with the terms of this Code of Business Integrity and the Group's policies, including its Social Media Policy.



Ethics and Integrity in doing Business

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Anti-Bribery and Anti-Corruption

Syensqo commits to conducting its business in an ethical, fair, and honest way. At Syensqo, we compete in our markets based on the quality and value of our products and services, and we do not use corruption to gain an unfair competitive advantage. Syensqo prohibits corruption in any form, including bribery. Bribery is the offering, giving, soliciting, or receiving of an item of value (or any other advantage) in order to improperly influence the judgment or conduct of a person in a position of authority. We shall not give or receive

bribes in order to obtain or retain business. Facilitation payments, which are small payments made to low-level government officials to encourage them to perform their job duties, are also prohibited. Syensqo employees shall never use a third party, such as an agent or a consultant, to pay bribes or make facilitation payments.



Q: In order to get a needed license for a plant expansion, a government official has requested that we pay his airfare and all other travel expenses to visit our site. Should we do it?

A: Paying for the travel expenses and accommodations of a government official so that he/she may perform the duties of his/her job at a remote location may be permissible under limited circumstances. However, any such payment should be cleared with the government official's management and authorized in writing on the relevant agency's letterhead. Many government officials are not permitted to accept gifts or entertainment above a statutory amount. In any situation of doubt, you should consult your Regional Compliance Officer. However, if this is a legitimate business expense that is essential to the business' ability to operate, it should be permissible. If you are routinely interacting with government officials in your employment capacity with Syensqo, you should familiarize yourself with regulations governing gifts and entertainment and/or facilitation payments. Also, be sure to report any such entertainment on the Gifts and Entertainment Tracking System ("GETS"), which seeks your manager's pre-approval for such payments.

Q: We need government approval to do a project in a country where Syensqo does not currently have any facilities, and the government suggested that we use a certain consulting firm to help us with the process. When I asked the firm for a quote for the consulting work, I was surprised at how high it was compared to other consulting firms in the country. I am inclined to engage the firm, despite the high price, because I think it has better connections with the government than other consultants. Is there any reason for me to be concerned?



A: Being asked to use the government's preferred consultant in a country in which the Group has no facilities may be totally innocent or may be a cover for a hidden kick-back. Before reaching out to the referred consultant, find out what exactly the firm will be doing for Syensqo and compare the services to the other potential firms. It may be that the firm will deliver fewer or no additional services than other firms, and the increase in price is meant to be paid over to the referring government official as a kick-back. This type of payment would be a violation of anti-corruption laws in various parts of the world where Syensqo conducts business. Consult with your Regional Compliance Officer if you need further clarity.

Gifts and Entertainment

As a general principle, gifts and entertainment may be given or accepted only if it serves to improve Syensqo's image, better present Syensqo products, or establish cordial business relations. While we want to encourage our employees to build business relationships with our business partners, we must not influence or appear to influence independent judgment. The exchange of business gifts and entertainment, whether to business partners or government officials, must always comply with our Gifts, Entertainment and Anti-Bribery Policy and the applicable local laws.

Syensqo employees cannot solicit business partners for business gifts and entertainment, and business partners should never feel obligated to give gifts or entertainment to any Syensqo employee. Cash and cash equivalents, such as shopping vouchers and gift cards, cannot be given or accepted. Any exceptions must be presented in advance and approved by the Ethics & Compliance department. Where business gifts and entertainment exceed the acceptable reasonable value limits set forth in our Gifts, Entertainment and Anti-Bribery Policy, prior approval must be obtained from your manager through our Gifts and Entertainment Tracking System ("GETS").

When dealing with government officials, Syensqo employees must be very cautious about giving or receiving gifts and entertainment, as even an appearance of impropriety could cause significant damage to Syensqo's reputation. Syensqo employees shall not give any gifts to government officials unless such gifts are promotional in nature and of nominal value bearing Syensqo's logo and endorsed by Syensqo employees may entertain a government official only if prior approval from the employee's manager has been obtained through GETS, or if such entertainment is part of a business event and does not give rise to an appearance of impropriety.

Disguising gifts or entertainment as charitable donations is a violation of this Code and the applicable Group policy and is not accepted.



Q: During the holidays a supplier I regularly interact with sent me a nice gift that I really want to keep. Am I violating the Code of Business Integrity if I keep the gift?

A: Please refer to the Syensqo Gifts and Entertainment Policy to understand the value of gifts and entertainment that are permissible between Syensqo employees and third-parties. You should use the Gift and Entertainment Tracking System ("GETS") to record the value of the gift and to obtain the approval of your manager, if the value exceeds the amount set forth in the Policy for your region.



Fair Competition

Syensqo values fair and open competition and wants to succeed ethically and with the highest integrity. The Group does not enter into business arrangements that distort, eliminate or discourage competition, or that provide improper competitive advantages.

Financial Records and Accounting

Syensqo accurately informs its shareholders of all actions, events or decisions reasonably likely to have a significant effect on their investment decisions. Syensqo's books and records must always reflect actual financial information consistent with International Financial Reporting Standards. Employees must ensure that the records are accurate and properly retained in accordance with applicable laws and regulations.

Insider Trading

Employees who have access to inside information shall not buy or sell any securities based on that information or communicate it to someone else. This concerns securities of Syensqo, of companies belonging to the Syensqo Group and of third parties. Inside information in particular means information that has not yet been made public and which, if it were made public, would likely have a significant impact on the trading price of the securities. Syensqo strongly opposes any form of insider trading and all employees must strictly comply with the applicable laws and Group policy on Insider Trading.

International Trade

Syensqo observes and supports all laws and regulations governing the export and import of products, technologies, services, and information throughout the world. In particular, the Group respects regulations that govern doing business in embargoed countries or with embargoed persons or embargoed organizations. In doing business, we must comply with the Group Export Compliance policy.

Supply Chain

Syensqo respects its business partners and honors its binding commitments. The Group expects its vendors, suppliers and customers to comply with all laws and regulations governing their activities, both within their own worksites and the Group's. They are also encouraged to adhere to the spirit of this Code of Business Integrity in their operations.

Syensqo applies a worldwide structured, fair and ethical process to select and evaluate its suppliers in order to build a mutually beneficial relationship with them. Our suppliers are selected on the basis of objective criteria such as quality, reliability, competitive pricing and ethical behavior.



Ethics and Integrity in Society as a Corporate Citizen

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Human Rights

Syensqo is committed to respecting and supporting human rights with regard to its employees, the communities in which it operates and its business partners as expressed in the internationally recognized standards including the U.N. Universal Declaration of Human Rights and UN Guiding Principles on Business and Human Rights. We do not employ people against their will or deprive them of their protected rights.



We expressly condemn any and all forms of exploitation of children. We adhere to the legal minimum age requirements as outlined in the relevant International Labour Organization (“ILO”) conventions and the laws of the countries where we operate.



We ensure that working hours and remuneration comply with laws and are fair and just. We respect individual rights to freedom of opinion and association. Syensqo takes seriously any indication that human rights are not properly protected within our sphere of influence. We are expected to understand the human rights issues that may be at stake in our work - places and should prevent any violation of these rights.



We expect our business partners to apply equivalent principles and actively support them in their implementation where needed.



Sustainability

Responsibility is a fundamental part of Syensqo's identity - so much so that it manifests itself in our key choices and actions. In an effort to guide our Group - and society at large - toward a more sustainable tomorrow, Syensqo has created Syensqo Way, a program that turns our ambitions into concrete measurable actions, and we have also developed the Sustainable Portfolio Management tool to link together strategy and sustainability.

Syensqo is committed to safeguarding People and the Environment by continuously improving its environmental, health, and safety performance; the security of facilities, processes, and technologies; and chemical product safety and stewardship through the supply chain, in line with Syensqo's signature of the International Council of Chemical Association's Responsible Care Global Charter. We continue to focus on the UN Sustainable Development Goals where we can have a material impact, either positive or negative. We are a signatory to the UN Global Compact and support the ten principles with respect to human rights, labor, environment, and anti-corruption. We are also a signatory to the Global Framework Agreement with IndustriALL Global Union.

We commit to fostering an open, challenging, and constructive dialogue with our employees and their representatives.



Q: During a CSR assessment conducted in the frame of a tender process with potential suppliers, I realize that one of the suppliers is not scoring very high in its compliance with local labor conditions. Can I engage this supplier, knowing that the price it offers is much better than the price of its competitors?

A: Syensqois committed to being a leader in Corporate Social Responsibility with regard to its own business and that of its suppliers. When we evaluate a potential supplier price is but one factor, and no more important than the supplier's CSR commitment. If the supplier is scoring low in labor compliance there could be unforeseen costs resulting from accidents, labor unrest, and other problems directly flowing from its approach to the treatment of its employees, that could affect its price in the future. You should reconsider this supplier and seek out one that is slightly more expensive, but which has a demonstrated commitment to Corporate Social Responsibility.

Political Contributions

The Group does not take part in party political activities nor does it make corporate donations to political parties or candidates. However, the Group will engage in a constructive debate with public authorities on subjects of legitimate interest to Syensqo. Only those employees specifically authorized to do so will carry out these activities. In this respect, the Group may support non-governmental organizations. Syensqo respects the freedom of its employees to make their own political decisions. Any personal participation or involvement by an employee in the political process must be on an individual basis, in the employee's own time and at the employee's personal expense.

Charitable Activities and Corporate Philanthropy

Syensqo strives to make positive contributions in the communities in which it operates and encourages its employees to do the same. Syensqo's corporate philanthropy is principally directed at educational, scientific, and humanitarian endeavors across the globe. Employees wishing to make donations in the name of Syensqo – whether by financial contributions or volunteer activities – must receive pre-approval from the appropriate management representative.



Enforcement

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Violations of this Code of Business Integrity or the related policies and procedures will not be tolerated. Syensqo encourages everyone to Speak Up when behavior inconsistent with the Code is observed. Managers and leaders are expected to handle such reports and to refer them to the appropriate member of management and/or the Ethics & Compliance department. Violations can lead to disciplinary action consistent with applicable laws and regulations, up to and including dismissal. In some cases, Syensqo may report violations to the relevant authorities.



Q: What kind of situations can be reported on Syensqo Ethics Helpline and what kind of evidence should I submit?

A: Syensqo Ethics Helpline should be used to report issues of misconduct such as fraud, corruption, discrimination, harassment, wrongdoing, and non-compliance with Code of Business Integrity, internal policies, and regulations. Although we recommend that you report your questions and concerns first to your manager or to the competent area (such as Human Resources, Legal, Audit, and others) if you do not feel comfortable speaking up in this way or if you prefer to remain anonymous, use Syensqo Ethics Helpline. Matters strictly related to salary, extra hours, promotion, and/or benefits should be reported to Human Resources.

When reporting a complaint try to provide as much detail as possible (e.g., what,

when, who, how, how much, where, and why), including formal evidence and the names of witnesses. Vague reports may make the investigation difficult or even impossible to conduct.

You should not use the helpline channel to report cases where there is an immediate threat to life or property. Reports submitted through this service may not receive an immediate response. If you require emergency assistance, please contact your local authorities.

IMPORTANT: The Reporter is responsible for the accuracy of the reported information and is subject to appropriate penalties if he/she misuses the channel.



Syensqo SA

Rue de la Fusée, 98

1130 Brussels

T: +32 2 264 2111

www.syensqo.com