

Arkema Group, United States

Code of Conduct

2023

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SECTION 1 – INTRODUCTION

From the President and CEO

Arkema strives to demonstrate world-class practices in the areas of safety, health, environmental protection and sustainable development. I am proud that we deliver great value and service to customers and to society as a whole, while consistently upholding high ethical standards. I like the fact that we never rest on our laurels, but instead work continually to improve at everything we do.

We must never stop working toward excellence in safety, health and the environment; in being a positive presence in our communities; and in maintaining high satisfaction among our customers and their customers. It is paramount that we ensure every employee goes home every day in the same condition as when he or she came to work. It is vital that we manage our operations in a way that keeps people and our environment healthy, so our neighbors feel secure about our presence in their community.

To be the kind of company we can feel good about, *every single employee* must be committed to these ideals, and committed to conducting business in a lawful and ethical manner. To help keep us focused and on track, Arkema has adopted an Ethics and Compliance Program and the following Code of Conduct – and I fully support them both. The Code of Conduct summarizes the most relevant laws and policies, and provides details on where to find the full version of each.

The Program includes an Ethics and Compliance Committee that I sit on, along with an Ethics and Compliance Officer, the Manager of the Responsible Care Management System, the General Counsel, and key leaders in Security, Environmental Health & Safety, Human Resources, Audit and Risk Management. Each of us is fully committed to running our organization in a lawful and ethical way.

As employees, each of us must comply with laws and policies, and must always demonstrate honesty, fairness and respect for others. Each of us must take individual responsibility for engaging in proper conduct. Our success depends on the integrity of every single employee.

Anthony O'Donovan
President & CEO, Arkema Inc. and Regional Leader, Arkema North America

SECTION 2 – INDIVIDUAL RESPONSIBILITY

Each employee has a responsibility to act ethically and lawfully in all of his or her business dealings. This means that in addition to complying with the Code of Conduct and the policies referenced in the Code, all employees are expected to perform their work with honesty and integrity in any areas not specifically addressed by the Code of Conduct. Arkema's commitment is to comply with applicable laws and uphold ethical standards in all our business activities. These standards apply to all of Arkema's activities in every market that it serves. The purpose of this Code of Conduct is to provide basic guidelines for situations in which ethical issues may arise. Failure to comply with any provision of this Code of Conduct subjects an employee to disciplinary measures up to and including termination.

This Code of Conduct, and the more general requirement to conduct all business lawfully and ethically, applies to all employees of the Arkema Group in the United States, members of the Board of Directors, agents, consultants, contract labor and others when they are representing or acting for Arkema. Managers have the additional responsibility to take the necessary and appropriate measures to achieve full compliance with the law and this Code of Conduct and to ensure that every employee reporting to them receives adequate training. If an employee has a question about any section of this Code of Conduct, they should direct their questions to their supervisor, one of Arkema's lawyers, the Ethics and Compliance Officer or the Ethics and Compliance Helpline. If an employee becomes aware that another employee has violated this Code of Conduct, or if an employee has been solicited to act in ways that are proscribed by this Code of Conduct, he or she is obligated to report it through one of the mechanisms described above. No person has the authority to violate any law or to direct or encourage another employee or any other person to violate any law on behalf of the company. No one has the authority to retaliate against an employee who reports a possible violation or who participates in the investigation of a potential violation; anyone who does so will be subject to disciplinary action, up to and including termination of employment.

This Code of Conduct reflects general principles to guide employees in making ethical decisions and cannot and is not intended to address every specific situation. As such, nothing in this Code of Conduct prohibits or restricts the company from taking any disciplinary action on any matters pertaining to employee conduct, whether or not the conduct is expressly discussed in this Code of Conduct.

The Company strongly encourages dialogue and discussion among employees and their supervisors to facilitate lawful and ethical conduct, a greater understanding of Arkema's Code of Conduct, and Arkema's expectations for employees. Situations that may give rise to ethical questions should be identified, evaluated and discussed so that acceptable ways of handling those situations may be identified and implemented. In cases where there is any doubt, employees should discuss the matter with the Ethics and Compliance Officer, a member of the Law Department, or call the Ethics and Compliance Helpline.

Often common sense will dictate what is the ethical course to follow. Conducting work ethically simply means doing the right thing. Some warning signs to alert you that you may be entering questionable ethical territory include whenever you hear or think: “Well maybe just this once...” “No one will ever know...” “Everybody does it.” When in doubt, employees should ask themselves: How would I feel if my actions were reported in the paper tomorrow? Will my action stand the test of time? Am I being fair and honest? Will I sleep soundly tonight? What would I tell my child to do?

All employees are expected to:

- Perform their work in a lawful and ethical manner;
- Read and understand the compliance policies that may apply to their position and comply with those policies;
- Complete any required compliance training, including any Code of Conduct training, and acknowledge their commitment to abide by the Code of Conduct.
- Be truthful, accurate, and complete in maintaining records, submitting documents, and making statements and reports to company personnel, government agencies, and others.

Ethics and Compliance Helpline

If you are concerned about an ethical or compliance issue, talk to your supervisor or contact someone with management responsibility in your facility or group or at Corporate Headquarters. You may also call the Ethics and Compliance Officer or a member of the Law Department. If you would prefer to communicate anonymously, call the:

Ethics and Compliance Helpline at 800-775-0493

The Helpline is answered 24 hours a day by an independent answering service called the Network. Or, if you prefer to make a report online, you may do so at: tnwgrc.com/Arkema. Either way, you will be asked to give a description of the issue and the location. The Network will forward the information to Arkema, which will initiate an investigation. All information given to the Network will be handled on an anonymous basis if you so choose. Remember, you do not have to identify yourself to Helpline employees or online. You may request a follow-up report, and this too can be done without giving your name. If you do decide to identify yourself, you can request a direct follow-up report on the matter.

No individual employee or contractor may be discharged, disciplined, or in any other way retaliated against by reason of the fact that they have made a report to Arkema Inc., the Ethics and Compliance Helpline or have otherwise cooperated in the investigation of a report to Arkema or the Helpline.

SECTION 3 – Health, Environment and Safety

Arkema subscribes to the concepts of continuous improvement, product stewardship and sustainable development. Arkema is committed to managing its business activities to meet the requirements of all applicable laws and regulations relating to health, environment and safety and the guiding principles of Responsible Care® codes. Arkema will operate its facilities and manage related activities in a manner that protects the environment and the health, safety and security of employees and the public; Arkema places safety and the protection of human health and the environment at the center of its objectives. Upholding Arkema’s commitment to health, environment and safety matters is a core responsibility of each employee. This includes:

- a. Understanding your role in carrying out Arkema’s HES policies and procedures.
 - Arkema’s safety requirement and commitment to environmental protection shall never be compromised for any reason: every employee must stop an operation or report to the responsible party if it happens to be unsafe or is detrimental to the environment.
 - It is the duty of every individual to perform tasks as per the site safety and environmental rules. These rules apply to everyone including contractors, visitors and Arkema employees.
 - No critical operation can be performed without proper risk assessments and formal work permits.
- b. Conducting your day-to-day activities in a manner that complies with all applicable company and legal requirements.
 - All individuals have to feel responsible for their safety, the safety of their co-workers and the protection of the environment.
 - Everyone’s vigilance and action must be aimed at avoiding accidents and environmental incidents.
- c. Communicating immediately every accident or safety or environmental incident to proper supervision or other responsible parties or as appropriate.

The Company’s HES Policies can be found by clicking [here](#).

In addition, the requirements of federal law, such as the Toxic Substances Control Act (TSCA) and Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), work as an early warning mechanism for chemicals with harmful effects to human health or the environment. Employees are required to keep records, and possibly report to EPA, on any claims that a chemical that we manufacture, process, import or distribute in commerce has or may have caused such harm. The TSCA and FIFRA Policy may be found by clicking [here](#).

Other Resources:

The following are available on ANNA under Departments> HES

- [HSE Corporate Manual](#)
- Additional Policies and Procedures on HES matters

Company Security

The security and protection of people is an overriding priority of all Arkema's business activity. It is the goal of the Company to protect persons, property, information and the environment from potential acts of violence, destruction or theft directed at the company, its employees or facilities. This commitment is guided by the Company's core values and ethical business practices. These core values include professionalism, respect for employees, neighbors and the public, and a concern for health, safety and the protection of the environment. The Arkema Security Policy may be found by clicking [here](#).

Section 4 – Respect for Our Employees

Harassment Free Workplace

Employees, vendors and customers are entitled to work in an environment free from unlawful harassment based on sex (with or without sexual conduct), race, color, religion, national origin, age, disability or sexual orientation or gender identity. Harassment or retaliation on the basis of an individual's opposition to unlawful discrimination, or opposition to any other unlawful act, also is strictly prohibited. The term "unlawful harassment" refers to any unwanted sexual attention or unwanted behavior engaged in because of a person's sex, race, color, religion, national origin, age, disability, sexual orientation or gender identity, that:

1. Involves a stated or implicit threat to the victim's employment status;
2. Has the purpose or effect of interfering with an individual's work performance; and/or
3. Creates an intimidating or offensive work environment.

Anyone believing that he or she has been subject to unlawful harassment should speak with their supervisor, the Ethics and Compliance Officer, Human Resources, members of the Law Department, or call the Ethics and Compliance Helpline. Those inflicting such behavior on others are subject to the full range of disciplinary actions, up to and including the termination of their employment. Likewise, acts of retaliation for reporting such conduct will be subject to the same range of disciplinary actions. The Harassment Free Workplace Policy may be found by clicking [here](#).

Confidential Employee Information

Records of current and former employees are uniformly maintained throughout Arkema in compliance with applicable law and standards of confidentiality. Arkema will request and retain only that information required for business, administrative or legal purposes. Information will be maintained in an accurate and current status, and may be maintained as hard copy or in electric format as the company deems appropriate. Strict limitations are placed on the internal availability of personal information to company management even with a clear need to know. Arkema will not, except in specific circumstances provided for in the Arkema Employee Records Policy, release information to outside sources without prior written approval from the employee. The Arkema Employee Records Policy may be found:

Equal Employment Opportunity

Arkema provides equal employment opportunity for all employees and prospective employees without regard to race, color, age, religion, national origin, sex, sexual orientation or status as a Vietnam Era Veteran and for qualified individuals with disabilities, with or without a reasonable accommodation. In this regard, Arkema ensures that all personnel actions such as compensation, benefits, transfers, layoffs, recalls, company sponsored training, education, educational assistance and social and recreation programs will be administered without regard to these factors. Arkema's Equal Employment Opportunity Policy may be found [here](#).

Family and Medical Leave

Eligible employees may be entitled to unpaid leave under the federal Family and Medical Leave Act (FMLA) for specified family and medical reasons. Arkema may require employees to substitute paid leave for unpaid leave in certain cases. FMLA leave will be granted to eligible individuals for up to twelve weeks. Employees returning from leave will generally be reinstated to the same or equivalent position, with equivalent pay, benefits, and other terms and conditions of employment. The Family and Medical Leave Policy may be found [here](#).

Immigration

Arkema is committed to complying with the immigration laws of the United States. Arkema will not discriminate against individuals who are legally permitted to work in the United States based on their country of origin or citizenship status. It is also Arkema's policy not to employ in any capacity any individual who is not authorized to work in the United States. All new employees must complete a Form I-9 at the commencement of employment. In addition, no Arkema location or facility may employ

a foreign national in the H-1B nonimmigrant classification without the prior written approval of the Vice President of Human Resources and Communications.

Wage and Hour

Arkema fully complies with the Fair Labor Standards Act. Accordingly, each position will be evaluated as to whether it is exempt or non-exempt from the requirement to pay overtime. Every employee in a non-exempt position will be paid one and a half times their regular rate for every hour over forty they work in a work week. Compensatory time off may not be substituted for overtime pay. Employees are responsible for obtaining approval from their supervisor in advance of working overtime and for ensuring that their time sheets correctly reflect the number of hours they have worked.

Workplace Violence

Arkema provides a work environment that is free from violence, threats of violence or intimidation for all personnel. Violence, threats of violence or intimidation of another individual in the workplace are never appropriate and will not be tolerated. All employees who observe or experience an act or threat of violence or intimidation should report it immediately to one of the following: any supervisor, the Site Manager, Human Resources Manager, or a member of the Threat Assessment Team. All reports of incidents regarding acts or threats of violence will be taken seriously and dealt with immediately and appropriately. Arkema's Workplace Violence Policy can be found [here](#).

Section 5 – Business Practices

Access And Use of Electronic Data And Communications Systems Policy

Arkema provides computer and other electronic data and communication equipment and systems for its employees for business purposes. The Access and Use Policy covers the authorized use, unauthorized use, disclosure, loss, and damage of Arkema Inc. electronic data and Systems. It applies to the security, integrity and confidentiality of information created, obtained, or maintained by Arkema employees. Employees with questions concerning their rights and responsibilities when accessing electronic data and communication equipment and systems should review the full policy, which may be found [here](#).

Antitrust

The United States has enacted antitrust laws to protect and promote free and open competition for the benefit of consumers. In general, antitrust laws prohibit certain monopolies and agreements that unreasonably restrain trade. Arkema requires full compliance with all applicable federal and state antitrust and competition laws and those of foreign jurisdictions. Certain employees are also required to complete periodic antitrust training.

Antitrust laws are very complex. Questions about these laws and how these laws apply to specific business transactions must be discussed with the Law Department. In particular, employees who are involved in sales, marketing, pricing, or who meet with competitors in venues such as trade association meetings, need to be especially aware of the rules relating to antitrust.

The antitrust compliance policy may be found [here](#). This policy, and the applicable law, prohibits such activities as:

- *Price Fixing (including informing competitors of future price increases)*
- *Bid Rigging*
- *Minimum Resale Price Maintenance*
- *Market Allocation*
- *Tying Arrangements*
- *Predatory pricing or conduct*
- *Unfair or deceptive acts or practices*
- *Boycotts*

In addition, you should consult with the Law Department if you are contemplating:

- *Distributor and Customer Terminations*
- *Exclusive Dealing*
- *Restrictions on resale or use*
- *Price Discrimination*
- *Joint ventures, mergers and acquisitions, and licensing of technology*
- *swap agreements*

Other Resources

The following antitrust guides are available on ANNA under Departments>Law:

- **Antitrust Compliance Guide**
- **Price Signaling**
- **Resale Price Maintenance**
- **Participation in Trade Associations**
- **Joint Procurement Arrangements Among Competitors**

Business Ethics

It is the policy of the company to conduct its business activities honestly and ethically. Arkema's Business Ethics Policy sets forth certain ethical standards to be applied by all employees in the conduct of the business of the company. In addition to legal, ethical and respectful behavior, all employees are expected to protect and safeguard Arkema's assets. The Business Ethics Policy may be found [here](#).

Key Elements of the Business Ethics Policy include:

- ***Conflict of Interest***

A conflict of interest may arise in any situation in which an employee's loyalties are divided between business interests that, to some degree, are incompatible with the interests of the company. All such conflicts should be avoided. An employee should not perform work outside the company that (a) is incompatible with their employment with the company; (b) competes with the company; or (c) uses Arkema's assets for any non-Arkema purpose.

- ***Gifts and Favors***

The purpose of gifts and entertainment in business is to create goodwill. An employee may not accept a gift, favor or service of more than modest value. If an employee believes that refusal of a gift of more than modest value might adversely affect Arkema's interests, the matter should be referred to the employee's supervisor, the Ethics and Compliance Officer, or the Law Department. Likewise, an employee also may not give a payment, gift or service to anyone for the purpose of unduly influencing the recipient or to secure preferential treatment.

- ***Personal or Family Interest***

Employees should promptly disclose to the Ethics and Compliance Officer any personal interest of the employee or any immediate family member of the employee in any company that does business with the company. Employees should use the Business Ethics Disclosure form on ANNIE under Departments>Law>Code of Conduct to disclose this information. Employees may not, without the prior approval of the Ethics and Compliance Officer, have a financial interest in, be employed by, hold office in, or be director of any supplier or customer of Arkema, or in any organization with which Arkema is doing business, excluding publicly traded stock in an amount equal to less than 5% of value of the issuing company.

- ***Misappropriation of Company Assets***

Employees are responsible to use Arkema assets for legitimate company business purposes only. Employees may not use or direct Arkema assets to benefit the employee, or a family member of the employee.

- ***Political Contributions***

Employees may not make or solicit contributions in Arkema's name or with any company assets to any political party, campaign, group or candidate. Employees may make contributions to the Political Action Committee organized by Arkema employees.

- ***Books and Records***

Employees must reflect all financial transactions accurately in the books and records of the company. This includes such records as accounting records, financial reports, sales reports, inventory reports, expense accounts, time sheets and other documents reflecting any other type of business transaction. If an employee believes that information may not be accurately reflected in Arkema's books or records, the employee must bring this information to the attention of their supervisor, the Ethics and Compliance Officer, a member of the Law Department, or make a report on the Ethics and Compliance Helpline immediately.

- ***Negotiation for Future Employment***

Employees representing the Company in its dealings with any other company or person shall not negotiate for their future employment with that company or person.

Other Resources

The following additional resources are available on ANNIE under Departments>Law.

- Business Ethics Disclosure Form

Government Procurement

Arkema from time to time enters into transactions with the United States Government. For example, Arkema may sell product to the Government or submit a bid or proposal to the Government with the objective of obtaining business from the Government. In its dealings with the Government, it is critical that employees and agents of the company exercise a high level of integrity and ethical behavior and avoid conduct or practices that may give rise to even an appearance of impropriety. All cost and pricing information must be accurate. Costs submitted for reimbursement must be reported accurately. No payments or gratuities may be offered or received in any dealing with the Government. The Government Procurement policy may be found [here](#).

Human Trafficking, Forced Labor and Child Labor

Arkema is committed to protecting human rights and preventing human trafficking by promoting and complying with human rights laws and standards in our locations worldwide. Arkema does not tolerate slavery, child labor, forced labor, or human trafficking. Arkema

requires all employees, vendors, suppliers, contractors, temporary workers, and service providers to follow this policy:

- Do not engage in any slavery, child labor, forced labor, or human trafficking-related activities
- Employees are required to report to their manager, the Chief Compliance Officer, any member of the Law Department, or to the Doing What's Right Hotline, any suspected slavery, child labor, forced labor and/or human trafficking-related activities by suppliers, customers, service providers, or Arkema.
- Adhere to Section 307 of the U.S. Tariff Act of 1930 that presumes that the importation of any goods, wares, articles, and merchandise mined produced, or manufactured wholly or in part in Xinjiang Uyghur, or produced by certain entities, is produced by forced labor and therefore prohibited from being imported into the United States.
- Ensure our vendors and employees have certified that they follow import policies, processes and procedures, including those related to human trafficking, forced and child labor, to ensure there is visibility and traceability of the supply chain.

Lobbying

Arkema is engaged in a dialogue with federal and state elected and senior administrative officials on a host of public policy issues that impact the economic health and competitiveness of the company. While these discussions are entirely appropriate and help to inform those in government with policy-making authority, the public has an interest in understanding the nonpublic communications that occur between the business community and government officials. Federal, and some state, laws require Arkema to report all lobbying activity directed to "covered officials," as well as all relevant expenses, and to specify the legislative or regulatory issue(s) discussed.

Employees whose work activity brings them into contact with government officials on policy issues must be familiar with the company's reporting responsibilities. *If you are uncertain as to whether or not your "contact" with a government official qualifies as reportable, report the meeting and describe the subject matter or purpose of the meeting as required by the Monthly Lobbying Activity Report form. Government Affairs will determine whether or not the meeting or "contact" qualifies for reporting and will review the matter with you should further clarification be needed.* The Lobbying Disclosure/Compliance Reporting Policy can be found [here](#).

Records Retention

Arkema has adopted a Records Management Program to guide employees in managing the company's business records in a timely and cost-effective manner. Arkema business records include all written, recorded or graphic material created or received by the company in the course of business. All records vital for the ongoing operations of the business, or required to be retained by law, shall be identified, appropriately safeguarded and maintained. All records not necessary for legal or business reasons and not required to be retained by law shall be destroyed in accordance with the Records Management Program in order to reduce the high cost of storing, indexing and handling the vast amount of documents that would otherwise accumulate. The Corporate Records Management Program and the Records Retention Schedule can be found [here](#).

Record retention policies related to Health, Environment and Safety records may be found [here](#).

Any employee who has reason to believe a Record subject to a Record Preservation Directive is in danger of being discarded, destroyed, altered, mutilated, concealed, covered up, falsified, deleted, removed or otherwise disposed of must **immediately** take steps to prevent such action from occurring and report the matter to Arkema's General Counsel. Employees should know that a Record Preservation Director supercedes, and has precedent over, the records retention policy. *Any person violating this policy may be subject to (1) criminal prosecution for obstruction of justice, contempt of court or other criminal violations, which may be punishable by substantial fine, imprisonment or both; (2) civil liability to third parties and/or the company; and/or (3) disciplinary action by the company, including termination of employment. Disciplinary action, including termination of employment, may also result for failure to honor a Record Preservation Directive.*

Securities Trading

The United States has insider trading laws that prohibit trading in a company's stock while in possession of material, nonpublic information about that company. You may learn of material inside information about Arkema, its parent company, or one of its affiliates or another company before this information is known publicly. It is against the law to buy or sell stock in any company while possessing material nonpublic information about that company, or to pass this information on to someone else who then buys or sells stock. Material information is information that a reasonable investor would consider important in deciding whether to buy, hold or sell the security. Nonpublic information is information that has not been made generally available to the investing public. Insider information may include among other things, knowledge about new products, financial data, acquisitions or divestitures, or business strategies. The Insider Trading Policy and Guidelines may be found [here](#).

Section 6 – International Trade

Import and Export Compliance

The Arkema Group is committed to compliance with laws and regulations applicable to imports, exports and re-exports. U.S. and International trade laws govern our activities. In conducting our international business, we are committed to adhering to both U.S. and international trade laws. Some of our products, technologies and data may have a dual use. In the hands of the wrong company or individual these products, technologies or data could be used to for improper purposes, such as to develop weapons or other defense related articles. There are various regulations and other requirements that apply to international shipments and sales. All employees involved with the sale or shipment of goods, **including samples**, destined for any foreign country must be familiar with and comply with these requirements. The Export Compliance Policy may be found [here](#). To facilitate compliance, Arkema has also developed an Export Procedures Manual and appointed Export Control Personnel. All employees must secure advice from the Export Control Personnel whenever there are questions concerning the proper application of the laws and regulations applicable to exports and re-exports. Arkema must also comply with import regulations and duty laws. This includes compliance with Section 307 of the U.S. Tariff Act of 1930 that establishes a presumption that the importation of any goods, wares, articles, and merchandise mined produced, or manufactured wholly or in part in Xinjiang Uyghur, or produced by certain entities, is produced by forced labor and is prohibited from being imported into the United States.

Arkema employees involved with international trade must remain aware of the Parties listed on the U.S. Government’s Denied & Debarred Parties List and must not do business with those entities. Employees are prohibited from conducting business with U.S.-sanctioned countries, directly or indirectly, including providing military products or services to a sanctioned country.

- Employees involved with international sales or shipments should be familiar with the following, and be sure that they follow developments for changes or new/modified versions:
 - The Bureau of Business of Industry and Security (BIS)’s export and re-export regulations, including those applicable to Arkema’s exports or re-exports of dual use commodities, technology, defense articles and technical data. (see www.bis.doc.gov and Arkema’s Export Manual);
 - US Bureau of Customs and Border Protections (CBP) regulations applicable to exports (see <https://www.cbp.gov>)
 - International Traffic in Arms Regulations (ITAR) of the Department of State (see <https://www.pmddtc.state.gov> and the Company’s Export Manual);
 - Denied & Debarred Parties List (see <https://www.bis.doc.gov>)

- Export Clearance Requirements promulgated and administered by the US Census Bureau (see <https://www.census.gov/foreign-trade/regulations/index.html>).
- Office of Foreign Asset Control (OFAC) <https://home.treasury.gov/policy-issues/office-of-foreign-assets-control-sanctions-programs-and-information>
- The Uyghur Forced Labor Prevention Act <https://www.cbp.gov/trade/forced-labor/UFLPA#:~:text=The%20Act%20requires%20CBP%20to,in%20part%20by%20forced%20labor.>

Foreign Corrupt Practices Act

Arkema manufactures, distributes and sells products outside the U.S. through a variety of arrangements, including subsidiaries, joint ventures, and licensees. All employees, and others acting on behalf of the company, who are engaged in any activity that relates directly or indirectly, to sales to, or contacts with, foreign government officials on behalf of the company, must be knowledgeable about the requirements of the Foreign Corrupt Practices Act (FCPA) and the Anti-Bribery Act. A company employee, an agent or consultant cannot offer anything of value to a government official anywhere in the world to obtain or keep business. If you are in doubt about whether a payment is a permissible business expense or a payment prohibited by the FCPA, consult with the Law Department. Arkema and its employees are required to keep accurate books and records regarding payments to government agencies and officials. Even small permissible payments to government officials must be recorded properly. The Arkema Foreign Corrupt Practices Act may be found [here](#).

U.S. Antiboycott Laws

Arkema and its worldwide affiliates over which Arkema has control, or in which Arkema owns, directly or indirectly, an interest of 10% or more, and their employees, shall comply with all applicable antiboycott laws of the United States. Generally, the laws prohibit any action which has the effect of furthering or supporting a restrictive trade practice or boycott against a country friendly to the United States or against any U.S. person (including United States companies). In addition, the laws require that certain requests that Arkema participate in a boycott be reported by the company to certain federal agencies. Further, the laws impose fines for participating in a boycott, or for failing to report boycott related requests, and also impose criminal penalties for willful violations. Reportable requests that the company engage in boycott-related actions most often involve requests to participate in or cooperate with the Arab boycott of Israel. The Arkema Antiboycott Policy may be found [here](#).

Section 7 – Intellectual Property

Copyright

It is the policy of Arkema to comply with the provisions of the copyright laws and to observe the rights of others in respect of copyright. Particular attention is to be paid to prevent unauthorized copying of books and periodicals and to avoid unauthorized use of computer software. Use of unlicensed software and unauthorized copying of licensed software are prohibited. The complete Copyright Policy may be found [here](#).

Trade Secrets

Arkema operates in many different and extremely competitive markets. Every employee should be aware that in any competitive environment, proprietary information and trade secrets must be safeguarded in the same way that all other Arkema assets are protected. Trade secrets are protected by international laws such as NAFTA and GATT. Under the federal Economic Espionage Act, criminal penalties may be imposed for the theft of trade secrets. In addition, most states have laws that impose civil or criminal penalties for trade secret theft.

In order to be able to invoke the protection of these laws, Arkema employees are required to take reasonable steps to maintain the secrecy of confidential and proprietary information. In a similar vein, Arkema employees are also required to use only ethical and legal means for collecting information relating to our competitors.

The Trade Secret Policy, which can be found [here](#), and the Information Security and Protection Policy, which can be found [here](#) provide additional guidance on protecting the company's confidential information and respecting the confidential information of other companies.