

**Kemira Group**

# **Code of Conduct**

**Approved by the Board of Directors on June 7, 2017**

# Integrity starts with me



**At Kemira, our vision is to be the first choice in chemistry for water intensive industries. This means we must provide expertise, application know-how and chemicals that improve our customers' product quality as well as their process and resource efficiency. It also means that we must operate efficiently, safely and in a responsible way, while employing the best people with the right service attitude and a passion for our business.**

Our Code of Conduct (the Code) is the foundation for our business conduct in Kemira. Our values are embedded in our corporate culture and connect each of us around the world. Our Code puts a framework around our values and reflects our commitments towards our key stakeholders.

## **It's about doing things the right way**

We believe that how we do things is even more important than what we do. We have the Code to ensure you have the answers you need to do your job in a lawful and ethical manner. It doesn't just tell us how to work, but how to live our values and the Code principles in every decision and action we take. So, it's about doing things the right way. It's about making decisions guided by integrity and ethics. It's about keeping our promises and treating each other and our business partners fairly, and with respect.

## **Guided by internationally defined principles**

Being a responsible business means supporting internationally defined principles on human rights, labor conditions, the environment and anti-corruption. We have committed to these principles by signing The United Nations Global Compact and by reflecting those principles in our Code. Kemira is a signatory of Responsible Care, the voluntary initiative of the global chemical industry.

## **It's our personal responsibility**

We are all personally responsible for ensuring that our actions and decisions reflect our values and the Code principles. Also the third parties working as part of our operations must commit to the principles expressed in our Code. You are expected to raise concerns and ask questions when you see or hear something that could be against our values or the Code. That's the only way we can live up to our commitment to integrity.

Our success is closely related to our reputation, it's up to all of us to protect that reputation. Please take the responsibility to communicate with each other and our partners about the standards we've put in place with the goal of ensuring our company remains one of the best.

A handwritten signature in black ink, which appears to read 'Jari Rosendal'. The signature is fluid and cursive.

**Jari Rosendal**  
President & CEO

## Purpose of the Code

At Kemira, we believe acting ethically and responsibly is not only the right thing to do, but also the right thing for our business. Kemira Group Code of Conduct (“Code”) is the foundation for doing business the right way. The Code reflects Kemira’s values and the principles set out in the OECD Guidelines for Multinational Enterprises.

Our Code provides us with the guidance and principles to adhere to the highest standards of integrity, legal compliance and ethical conduct. Our 19 Code Principles reflect our commitments towards our key stakeholders:

1. our work community
2. our customers, suppliers and markets
3. society and
4. investors.

These Principles are set out in the following chapters.

Each of us at Kemira must act in accordance with our company values and the Code Principles and comply with company policies, laws and regulations. Our values and Code Principles are an expression of who we are and how we want to be perceived by our stakeholders. Laid down in this Code and in company policies and procedures, they are expected to be put into practice by all employees on a daily basis.

This Code applies to every employee and manager, and to our Board of Directors; it governs every decision we make as part of our daily work. We are all encouraged to raise questions relating to this Code with the line managers and it is the responsibility of all Kemira managers to support their teams in matters relating to this Code.

## CORE PRINCIPLES

# Working together

### Our commitments to the work community

The guiding principles of our values include putting safety first in all our actions, respecting others and succeeding together. Our success can be achieved only when we treat everyone, both within and outside our company, with respect.

### Safety and wellbeing

## 1 CODE PRINCIPLE

**We are committed to provide safe and healthy working conditions in all our locations for both our employees and contractors.**

No matter where we work or what we do for our company, we put safety first in all our actions. All of us must contribute to the safety and wellbeing of the workplace by encouraging behavior based safety culture, being alert and aware of the policies, standards and procedures and by reporting any incident and unsafe condition.

We support the physical and mental wellbeing of our employees and recognize the need for an appropriate balance between work and private life.

### Diversity and inclusion

## 2 CODE PRINCIPLE

**We respect the diversity, talent and abilities of others.**

We at Kemira define “diversity” as all the unique characteristics that make up each of us: personality, lifestyle, work experience, ethnicity, religion, gender, sexual orientation, age, national origin, ability and other characteristics. We focus our efforts to attract, develop and retain a workforce that is diverse, and to ensure an inclusive work environment that embraces the strength of our differences. We do not discriminate or treat employees or job applicants unfairly in matters that involve recruiting, hiring, training, promoting, compensation or any other term or condition of employment.

## Respect and harassment-free environment

### 3 CODE PRINCIPLE

**We treat people with dignity, decency and respect.**

All of us at Kemira must maintain a work environment in which people are treated with dignity, decency and respect. That environment is characterized by mutual trust and the absence of harassment, intimidation, oppression and exploitation. We do not use any form of forced or child labor.

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## Freedom of association

### 4 CODE PRINCIPLE

**We respect freedom of association and collective bargaining.**

Kemira employees have the right to choose whether or not to be represented by a trade union for the purpose of collective bargaining.

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## Privacy

### 5 CODE PRINCIPLE

**We respect the privacy of our employees and other stakeholders.**

We respect the privacy of the personal information to which we have access. We collect, process and retain personal information only for legitimate business purposes and in compliance with applicable laws.

All of us at Kemira who have access to personal information are responsible for handling such information with due care and safeguard it from unauthorized access and use.

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# Doing business

## Our commitments to customers, suppliers and markets

We comply with all applicable laws wherever we do business and treat all those in the marketplace with whom we come into contact with fairness and integrity. This includes our customers, agents, distributors, competitors, suppliers and contractors.

### Product safety, quality and information

#### 6 CODE PRINCIPLE

**We aim to ensure that our products are made and developed to the highest ethical and safety standards and delivered to our customers according to our promises.**

We follow the applicable laws and regulations on chemical product safety, including the communication of the hazards and information on the safe use of chemicals. We all must follow the applicable instructions regarding safe use of chemicals as part of our daily work.

We are committed to providing product and service quality to our customers. This means delivering the right product and service to the right customer, in time and safely, aiming to meet the promised resource efficiencies or customer product quality improvements.

We follow highest ethical standards in acquiring and using information in our research and development processes.

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### Fair competition

#### 7 CODE PRINCIPLE

**We compete fairly.**

We compete vigorously, yet fairly and ethically, and within the framework of applicable competition laws. Each Kemira employee must adhere to competition laws, regulations and Kemira policies.

We respect the valid intellectual property and confidential information of others.

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## Trade compliance

### 8 CODE PRINCIPLE

**We conduct our business according to applicable trade compliance laws and regulations.**

We operate our business in an international trade environment which requires importing and exporting of products, other goods, service and information, from one country to another.

We comply with applicable laws and regulations that affect our operations. Regulations include, but are not limited to embargoes and sanctions, customs import and export regulations, export controls, customs valuation, country of origin and preferential trade.

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## Anti-corruption, gifts and entertainment

### 9 CODE PRINCIPLE

**We earn our business on merit and act with integrity wherever we operate. Our actions and decisions must always be made in the best interests of customers, our business and society.**

We do not tolerate improper or corrupt payments made directly or indirectly to a customer, government official or third party, including facilitation payments, improper gifts, entertainment, gratuities, favors, donations or any other improper transfer of value. We engage only

reputable sales representatives and other third parties who share the same commitment.

We make sure that gifts and hospitality always support a clear business objective and are accurately recorded, of reasonable value and appropriate to the nature of the business relationship.

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## Business partners

### 10 CODE PRINCIPLE

**We deal only with business partners who conduct business ethically and responsibly.**

We seek productive, ethical and transparent relationships with our suppliers, agents, distributors, customers and contractors. We expect our partners to follow all applicable laws and regulations, and share the principles expressed in our Code.

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## Anti-money laundering

### 11 CODE PRINCIPLE

**We do not accept, facilitate or support money laundering.**

We comply with all laws that prohibit money laundering or financing for illegal or illegitimate purposes.

# Being a good corporate citizen

## Our commitments to the society

We stand with our employees ready to respond ethically and with integrity to the needs of our surrounding communities and society.

### Human rights

## 12

CODE  
PRINCIPLE

**We respect the fundamental human rights.**

We are committed to the principles of The Universal Declaration of Human Rights and the United Nations' Global Compact, and we expect our suppliers and business partners to share these principles.

We seek to ensure that materials used in our products come from socially responsible sources. We do not tolerate, contribute to, or facilitate any activity that fuels conflict or violates human rights.

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### Dealing with governments

## 13

CODE  
PRINCIPLE

**We follow high ethical standards and act in a transparent manner when interacting with governments and public officials.**

We are honest and accurate and follow Kemira's policies and procedures and any applicable laws in our dealings with governments and public officials.

### Environmental responsibility

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CODE  
PRINCIPLE

**We seek to lower the environmental footprint in our value chain.**

We identify and look for opportunities to reduce any negative environmental impacts of our manufacturing or our products during production as well as during their lifecycle.

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### Political activity

## 15

CODE  
PRINCIPLE

**We observe neutrality with regard to political parties and candidates for public office.**

We do not take part in political activities nor make corporate donations to political parties or candidates. Neither the names nor the assets of Kemira shall be used to promote the interests of political parties or candidates.



# Creating sustainable growth

## Our commitments to the investors

Acting with responsibility and transparency goes hand-in-hand with protecting shareholder value. Each employee creates value for our shareholders and other investors by putting our company's interests first, maintaining accurate business records, and protecting and properly using company resources, information and property.

## Company assets and information

### 16 CODE PRINCIPLE

#### **We use company assets and information with due care.**

All of us at Kemira must use company resources honestly, efficiently and only for legitimate business purposes.

We must protect our resources from theft, loss, damage, or misuse. Resources include physical property, such as facilities, supplies, equipment, machinery, raw materials, finished products, vehicles and company funds. They also include intangible assets, such as company time, confidential information, intellectual property and information systems.

All of us must manage, use, disclose and distribute Kemira's proprietary or confidential information according to our policies and actively protect our intellectual property. Any non-public information

that suppliers, customers or other business partners entrust to Kemira must be managed in accordance with applicable legal and contractual requirements.

## Conflict of interests

### 17 CODE PRINCIPLE

#### **We make sure our decisions are taken independently of private interests or divided loyalties.**

All of us at Kemira must make business decisions and conduct all business activities in the best interests of Kemira, not based on our own personal interests.

All of us must recognize and avoid conflicts of interest and abstain from any decision making that involves potential or actual conflict of interest. We must always disclose any potential or actual conflict of interest situation to the relevant management.

## Transparency and reliable financial records

### 18 CODE PRINCIPLE

**We apply high quality standards with regard to disclosure of financial and non-financial information.**

All business transactions conducted on behalf of Kemira must be reflected accurately and fairly in the accounts of the company. As a listed company we have an explicit obligation to disclose without delay any significant information which might affect the value of our shares.

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## Inside information and insider dealing

### 19 CODE PRINCIPLE

**We pursue the highest ethical standards with respect to inside.**

We protect confidential business information, especially when its disclosure could influence the share price of Kemira or another company. All Kemira employees must comply with all applicable laws, rules and Kemira policies relating to inside information and insider dealing.

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## LIVING WITH OUR CODE

### Applying the Code Principles

Kemira's Ethics and Compliance function is accountable for promoting and enforcing this Code. However, the ultimate responsibility for following the Code and for maintaining our ethical culture rests with each one of us individually.

If you have any questions about how to interpret or apply the Code, or any other company policies, please consult your manager or Ethics & Compliance function.

### Speaking up

We support a culture that encourages every individual to speak freely. We provide a safe, secure and confidential way to express concerns and questions when the usual ways are unavailable or inappropriate.

Every employee must raise up any concern or activity which could be in violation of this Code, company policy or law:

- to the relevant line management
- to Kemira's Ethics & Compliance function (e-mail: [compliance@kemira.com](mailto:compliance@kemira.com)); or
- via the Kemira Ethics and Compliance Hotline (links and local numbers are available in intranet)

Each line manager must forward all reports made to the line management to Ethics & Compliance function without any delay. A person, who in good faith reports misconduct, will not be retaliated against for making such a report. Any person, regardless of position, who engages in retaliatory behavior will be subject to disciplinary action.

## **Investigating Code violations**

All allegations of potential violations of this Code made in good faith will receive a fair and comprehensive investigation conducted with the relevant internal and/or external assistance.

Any reporting of potential Code violations will be treated strictly confidentially and anonymously to the extent possible.

Violations of our Code, including failure to promptly report a known Code violation, or making a false report of a violation, may result in disciplinary action up to, and including, termination of employment.

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