

Ampacet

Managing the Elements of Success™

Global Code of Conduct

April 2024

**AMPACET CORPORATION
GLOBAL CODE OF CONDUCT
TABLE OF CONTENTS**

I. Purpose of this Code.....	2
Why Do We Have This Code.....	2
Who Does This Code Apply To.....	2
Where to Find the Most Recent Code	2
What to Do If You Have Questions	2
Possible Disciplinary Action.....	3
No Retaliation	3
II. Integrity and Confidentiality	5
III. Integrity and Your Duty to Ampacet	7
Documentation and Scope of Authority.....	8
Communications and Media	8
IV. Integrity and Government.....	9
Political Activities	9
Lobbying.....	9
Public Official Visits and Speaking Engagements	9
V. Integrity and the Law	10
VI. Integrity in the Marketplace: Anti-Corruption Policy	13
VII. Integrity and the Community	14
The Environment	14
Health and Safety.....	14
Community Involvement.....	14
VIII. Receipt, Compliance and Employment.....	14

GLOBAL CODE OF CONDUCT
AMPACET CORPORATION
*(“Ampacet” or the “Company” which
references include its subsidiaries and affiliates)*

I. PURPOSE OF THIS CODE

Why Do We Have This Code

This Code contains a description of our basic principles of business ethics and related business activities. This Code is intended to clarify the Company’s rights and expectations as an employer, but does not add to, or subtract from, the employer rights or in any way create any contractual employment rights for employees. Because a corporation acts only through its agents or employees, an employee might possibly be held personally liable under civil or criminal law for wrongful acts committed at the Company. For example, under some circumstances, a supervisor might be found liable for certain wrongful actions of an employee acting within the scope of his or her responsibility, even if the supervisor had no knowledge of the wrong doing. Accordingly, this Code is for your protection as well as to maintain Ampacet’s sterling reputation.

Who Does This Code Apply To

The Code is applicable to all officers, directors, employees (part time, full time and contract employees) no matter what your position, and all distributors, agents, consultants, lobbyists, joint venture partners and other representatives acting on behalf of Ampacet Corporation and its subsidiaries and affiliates. A violation of U.S. laws can arise out of activity conducted by Ampacet employees and representatives in and outside the U.S. The same might apply to laws and regulations of other countries where Ampacet operates and activities outside those countries. So no matter where in the world you live or work and no matter which Ampacet entity you are employed by, this Code applies to you and strict adherence is required.

Where to Find the Most Recent Code

This Code will evolve as laws and customs change in the areas where Ampacet conducts business and as Ampacet continues to expand into new countries around the globe. In certain cases, the Company may deem it necessary to supplement this Code to address specific topics or certain areas of the world. A copy of the most current and complete Code is available from Human Resources at our global headquarters in Tarrytown, New York, in the United States. Please contact David Gilbert, Executive Director, Human Resources, email: david.gilbert@ampacet.com and phone (914) 333-1651. A copy of the Code is also available for your review on our intranet site, Sharepoint. The provisions of this Code may be modified or eliminated at any time, with or without prior notice to you, in the Company’s sole discretion.

What to Do If You Have Questions

The purpose of this Code is to provide a general direction and guidelines so that you and all of Ampacet’s employees can seek further clarification on issues related to the subject of acceptable standards of conduct and operation. This Code is general in nature and cannot possibly cover every type of individual situation. In difficult or questionable situations, it is your responsibility to

ask for guidance. General questions should be addressed to David Gilbert, Executive Director, Human Resources, email: david.gilbert@ampacet.com and phone (914) 333-1651. However, all questions with respect to government investigations and government relations, the laws of the US or any country where Ampacet operates, and Ampacet's **Global Anti-Corruption Policy** referred to below in Part VI Integrity in the Marketplace, should be addressed to Ampacet's Chief Compliance Officer Gary Justiniano, email: gary.justiniano@ampacet.com and phone (914) 332-7309. Please also note and follow the reporting procedures in Appendix A to said **Global Anti-Corruption Policy**.

Possible Disciplinary Action

Each employee has the personal responsibility to ensure that his or her actions comply with this Code, the **Global Anti-Corruption Policy** and all applicable U.S. laws and regulations and other applicable laws and regulations in the location where business is conducted. Any reference to "applicable laws" or similar phrases shall mean and include applicable laws, rules and regulations of the appropriate jurisdiction. Please understand that violations of the ethical principles set forth in this Code or any applicable law may subject you to legal and disciplinary action, which might include, among other things (and in no particular order), suspension, reduction in salary, demotion or dismissal or termination, depending upon management's exercise of discretion under the circumstances and applicable laws.

Your Duty to Report

All persons covered by the Code have an affirmative duty and responsibility to report violations, actual or suspected, of this Code, the **Global Anti-Corruption Policy** and other Ampacet policies and procedures or of any applicable laws or regulations regarding Ampacet or its business by anyone covered by the Code. Failure to report known violations may result in disciplinary action up to and including dismissal or termination.

No Retaliation

No one making a good faith report of a violation will be subject to reprisals for such reporting. Ampacet will not tolerate any form of retaliation against anyone who brings a good faith complaint or makes a good faith report under this policy, or cooperates or participates in any compliance investigation. Violating Ampacet's no retaliation provision may result in disciplinary action, up to and including termination or dismissal.

How to Report

In general, you should report the violation to your supervisor. When this is not appropriate you should contact Human Resources or the highest ranking management official at your location or in your region. Again, if that is not appropriate or if you feel uncomfortable doing so, you should contact any of the following members of senior management at Ampacet's headquarters in Tarrytown, New York, in the United States set forth below. You will be instructed with respect to any notes or other relevant records or files you may have or should assemble and preserve.

NOTE: Due to variations in applicable laws, reporting procedures in Luxembourg are different. Accordingly, if you live in Luxembourg or work at any of Ampacet's facilities in Luxembourg and are reporting a violation or suspected violation of any Ampacet policies or procedures or applicable laws or regulations, you should refer to the reporting procedures set forth in "Appendix A: Reporting Corporate Governance Concerns" to the **Anti-Corruption Policy: Luxembourg** which is also available from Human Resources and on Sharepoint.

Specifically, for all matters or questions dealing with government relations and investigations, laws and regulations and Ampacet's **Global Anti-Corruption Policy** and otherwise, as appropriate:

Chief Compliance Officer

Gary Justiniano

Chief Financial Officer

Email: gary.justiniano@ampacet.com

Phone: (914) 332-7309

President and Chief Executive Officer

Alvaro Mendoza

Email: Alvaro.mendoza@ampacet.com

Phone: (914) 332-7356

Human Resources (corporate headquarters)

David Gilbert

Executive Director, Human Resources

Email: david.gilbert@ampacet.com

Phone: (914) 333-1651

Outside General Counsel

Smith, Gambrell & Russell, LLP

Neal Dorman, Esq.

Email: ndorman@sgrlaw.com

Phone: (212) 907-9700

For additional details regarding reporting, please refer to the "**Global Anti-Corruption Policy**," Appendix A "Reporting Corporate Governance Concerns" which is available from Human Resources and on Sharepoint (except as noted above regarding Luxembourg with respect to which you should refer to the **Anti-Corruption Policy: Luxembourg**).

Every incident reported will be investigated immediately and in a discreet manner. We recognize that every investigation requires a determination based on all the facts in the matter, as well as the serious impact a false accusation can have. Ampacet trusts that all employees will continue to act responsibly when reporting.

Ampacet will also take reasonable steps to keep an individual's identity and the information he or she submits confidential if so requested by the reporting person, and will only disclose said information on a need-to-know basis where that disclosure is:

- Necessary or appropriate in order to conduct an effective investigation and take appropriate action or,
- Otherwise required by applicable law.

II. INTEGRITY AND CONFIDENTIALITY

Protecting Ampacet Information

The protection of confidential business information and trade secrets are vital to the interests and the success of Ampacet. What constitutes confidential information or a trade secret may vary from country to country, however, confidential information generally includes, but is not limited to, the following examples (or any parts thereof):

Customer lists

Formulas

Pricing of products

Customer preferences

Processes

Financial information including financial statements, reports, budgets and projections

Methods

Marketing strategies

Machines and other equipment

Materials research

Manufacturing techniques

Pending projects and proposals

Proprietary production processes

Inventions

Research and development strategies and materials

Scientific data

Sales strategies

Company reports

Or any such data in any form that is strategic in nature

All employees are required to sign a standard form of "Employee Patent and Confidentiality Agreement" as a condition of employment and to recognize and agree to Ampacet's Intellectual Property Policy which is referred to and incorporated into the Employee Patent and Confidentiality Agreement. This agreement also provides that, to the extent permitted under applicable laws, all inventions, discoveries, improvements, products, formulae and the like are "work for hire" developed for and belonging to Ampacet and the Company has the unrestricted right to use and exploit all such intellectual property.

It should also be noted that confidential information can be overheard or observed so employees are also cautioned to (a) not discuss Ampacet matters in public places or anywhere they could be overheard by non-Ampacet personnel, (b) not remove any Ampacet materials from Ampacet

offices, (c) safeguard all laptops, computers, tablets and cell phones used to conduct any Ampacet business and (d) not leave Ampacet materials out in the open, even in Ampacet offices or facilities, if those materials could be observed by unauthorized persons, including visitors and non-Ampacet personnel. Reasonable care must be taken at all times to protect Ampacet's confidential information.

Ampacet strictly prohibits unauthorized release or disclosure of any confidential information or trade secrets through any means. Any employee who improperly uses or discloses confidential business information or trade secrets or does not take reasonable precautions to safeguard such information will be subject to disciplinary action, up to and including termination of employment or dismissal and legal action, even if he or she does not actually benefit from the disclosure of information. Employees also have a continuing obligation, beyond their term of employment with Ampacet, to refrain from disclosing or inappropriately using Ampacet's trade secrets or confidential business information.

No Infringement of Third Party Intellectual Property

Ampacet employees will respect the patents, trademarks, and copyrights of others. Ampacet's global reputation for integrity has been built over our many years. This reputation is crucial for each business transaction we enter into. Ampacet will not tolerate devious tactics that undermine the confidence that others have in us and the high regard and consideration we hold for our relationships with everyone with whom we conduct business.

You should not accept any confidential information of a competitor or any other third party without prior written authorization from the owner.

Licensing of Third Party Tools

Ampacet licenses third party confidential software and other information system tools that are the intellectual property of the author and/or supplier, and are protected by law. You are responsible for ensuring that all software and information system tools you load and/or use on your workstation are licensed for your use, and used in a manner consistent with the applicable license and intended use.

Inside Information

It is against Ampacet policy for you to profit directly or indirectly from inside, non-public information about the Company, its affiliates or any company, whether a customer, supplier or other third party, with whom Ampacet does business. Securities laws prohibit the purchase or sale of securities based on material, non-public information about a publicly traded company that is not available to the public. If you have this kind of information, you should not trade in the securities of said company, nor provide the information to others for that purpose, as this is a conflict of interest and illegal and could result in criminal prosecution.

III. INTEGRITY AND YOUR DUTY TO AMPACET

Avoiding Conflicts of Interest

Employees have an obligation to avoid actual, potential or perceived conflicts of interest. A conflict of interest arises when personal, family, social, financial or political activities or business relationships interfere with an employee's objectivity and loyalty to Ampacet.

Transactions with outside firms must be conducted within an acceptable business framework established and controlled by the senior management of Ampacet.

If you or a family member or other party with whom you have a personal, social, financial, political, business or other similar relationship have or may have any influence on transactions involving purchases, sales, contracts, leases, licenses or any other aspect of Ampacet's operations, it is imperative that you immediately disclose to the Chief Compliance Officer (or any other person(s) he may from time to time authorize to receive any such disclosure) the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties.

It is not feasible to present an exhaustive list of situations to which this rule applies. The following are among the types of actions or activities which may create an actual conflict of interest, or give the appearance of a conflict:

- Engaging in any outside employment which detracts from the efficiency of your duties as an employee of Ampacet;
- Engaging in any activity which conflicts with the business interests or purpose of Ampacet;
- Engaging in any personal financial, business or other relationships with present or potential suppliers, contractors, competitors or clients of Ampacet;
- Accepting gifts, bonuses, hospitality or anything of value (other than those which are infrequent and are of nominal value and offered as part of a normal business courtesy) from any present or potential supplier, contractor, competitor or customer of Ampacet;
- Using the position held or the knowledge gained in your position with Ampacet for personal gain or advantage, for you or for any family member or other any third party.

Ampacet employees are under a continuing obligation to make full disclosure to the Company of all situations involving either actual or potential conflicts of interest, whenever such situations may arise. If the Company determines that a conflict of interest or appearance of such a conflict exists, the employee will be asked to correct or to remedy the situation immediately and Ampacet may take whatever disciplinary action it deems appropriate.

Corporate Opportunity

You cannot take for yourself, your family or anyone else a business opportunity that could benefit Ampacet. As an employee of the Company, your loyalty is to the Company. This principle goes

beyond the ideas that you cannot use Ampacet information and that you cannot compete with the Company's business.

Accounting and Financial Reporting

All Company payments, receipts and other transactions must be accurately, completely and promptly recorded on the Company's books and records. All transactions must also be adequately supported with sufficient details to ascertain the nature and business purpose of each transaction. Without limiting the foregoing, Ampacet's expense reimbursement policy should be observed and standard expense forms should be utilized (*see* Ampacet's **Global Anti-Corruption Policy** referred to below in Part VI Integrity in the Marketplace, for certain important expense and approval forms). You are expected to adhere to Ampacet's internal financial reporting and record keeping requirements that conform with generally accepted accounting principles. You may not make any false, incomplete or misleading entries, nor may you establish, for any purpose, a secret or unrecorded fund of Ampacet monies or other assets. Also, you may not administer an account or fund for the benefit of others that may create a conflict of interest. Any actual or perceived financial irregularities should be promptly reported to your supervisor or any other appropriate Company representative.

Documentation and Scope of Authority

Most commercial transactions should be reflected in complete written agreements. These include real estate transactions, research and development projects, intellectual property transfers, supplier, distributor, and agent arrangements, joint ventures, acquisitions and divestitures. You should avoid oral contracts, handshake deals, and "gentlemen's" agreements. You should always act within your level of authority and never make unauthorized promises, commitments, or assurances to others. When terminating Ampacet's relationship with a supplier, distributor, or agent you should discuss the situation thoroughly with your supervisor before any decision is made. Material contracts may require review by our outside general counsel, Smith, Gambrell & Russell, LLP, or by local counsel. This also should be discussed with your supervisor, the Chief Compliance Officer or any other person(s) from time to time authorized by the Chief Compliance Officer to discuss any such matter.

Communications and Media

All communications with customers, suppliers and other third parties are to be professional, respectful, polite and straightforward. Ampacet will not tolerate any communication that has the effect of defaming or making derogatory remarks about anyone, creates an atmosphere of discrimination (on gender, religious, cast, cultural, racial or other grounds) or incites violence. Bear in mind that your communications with third parties are not generally confidential. Anything you say, write, text, post or email relating to Ampacet or its business could become public and could be used to negatively impact Ampacet.

Ampacet's policy is that all communications to the public, including financial information, news releases, and speeches, must be accurate and timely. You may also be asked by an outsider for a statement concerning Ampacet's position on a public issue, certain Company activities or a legal matter. All such inquiries are to be handled through the highest ranking Company official at the

location. No public releases concerning Ampacet's financial information may be made except through Ampacet's President and Chief Executive Officer, Alvaro Mendoza or Ampacet's Chief Financial Officer Gary Justiniano. Public speaking engagements and presentations by or on behalf of Ampacet (unless an integral and regular part of your job at Ampacet) should be preapproved in writing by and coordinated with Corporate Communications.

IV. INTEGRITY AND GOVERNMENT

While we encourage you to become politically involved and express your views as a citizen, you must be aware of regulations applicable to Ampacet's activities and to your own activities in your status as a Company representative.

Political Activities

U.S. Federal law and many applicable local laws prohibit Company contributions to political candidates or parties. Accordingly, no Ampacet employees or representatives may make any political contribution on Ampacet's behalf. If you engage in personal political activity on your own time, you must take care not to imply that you are acting on the Company's behalf. Ampacet facilities, property or logo identities may not be used for personal political activity.

Lobbying

Ampacet is permitted by law to undertake lobbying activities or to support or oppose public issues, but all such action must be approved in writing by and coordinated through the Chief Compliance Officer or any person(s) he may from time to time authorize to approve and coordinate any lobbying activity. Any contact with government personnel for the purpose of influencing legislation or rule making, including such activity in connection with marketing or procurement matters, is considered lobbying. Certain laws define lobbying even more broadly to include normal marketing activities. You are responsible for knowing and adhering to all the relevant lobbying laws and associated gift laws, if applicable, and for compliance with all reporting requirements. Bear in mind that lobbying practices, while common in some countries where Ampacet operates, may be illegal in other countries where Ampacet operates (such as Brazil). Any questions, regarding lobbying activity and applicable laws should be brought to the attention of the Chief Compliance Officer or any person(s) he may from time to time authorize to review lobbying activity. No employee shall take part in any lobbying activity on his or her own behalf while on Company time.

Public Official Visits and Speaking Engagements

Occasions may arise where public officials are requested to make non-partisan visits to Ampacet locations to better understand our products, programs and our views on public policy issues. However, such visits should not be permitted within 90 days of an election in which the official is a candidate. Political campaigning is not allowed on Ampacet property. Any exceptions must be approved in writing by the Chief Compliance Officer or any person(s) he may from time to time authorize to review such activity.

Likewise, public officials, candidates and prominent former officials may request to be invited or may be invited by Ampacet to speak at various Ampacet events. We generally do not pay honoraria

or travel expenses since in many instances such a payment would not be lawful. You must get the written approval of the Chief Compliance Officer (or any person(s) he may from time to time authorize to review such activity) before inviting these speakers.

Government Investigations

It is Ampacet's policy to cooperate with any appropriate governmental investigation. Inquiries, investigations, subpoenas, and other request for information must be immediately sent to the highest ranking company official at the respective location or to the Chief Compliance Officer or any person(s) he may from time to time authorize to act on Ampacet's behalf with respect to the foregoing. If you are personally approached by government investigators, explain that the Company policy is to cooperate and request sufficient time to consult with the Chief Compliance Officer or any person(s) he may from time to time authorize to act on Ampacet's behalf with respect to the foregoing. You should immediately notify your supervisor and regional management as well as Ampacet's Chief Compliance Officer. Always remember that there are civil and criminal penalties for you and the Company if you fail to promptly respond or furnish untrue or misleading information, destroy or alter records, or do anything to obstruct a government investigation or court order.

Dealing with Government Officials

Relations with officials of any national, federal, state, province or local government must be ethical and above board in all respects. Gifts, meals, travel and entertainment of any government officials may impugn the integrity and reputation of Ampacet, regardless of the amount, value or motive involved. Ampacet has a separate **Global Anti-Corruption Policy** described generally in Part VI Integrity in the Marketplace below and more specifically in the policy itself.

V. INTEGRITY AND THE LAW

Compliance with Laws and Regulations

The policy of Ampacet is to conduct its business in full compliance of all applicable national, federal, state, provincial and local laws and regulations. You should not take any action that you know or believe would violate any applicable laws or regulations. You will not be rewarded or supported by Ampacet for circumventing any laws even if such actions result in a profit to the Company. If a local law conflicts with this Code, you must comply with the local law. A violation of U.S. laws can occur as a result of activity outside the U.S.; similarly laws of any other country could be broken by activity outside that country. Accordingly, all laws and regulations should be complied with. Violations of the laws of any country where Ampacet operates could result in fines and even imprisonment.

In the event you perceive any possible conflict between the laws and regulations of different countries, or if you have the slightest doubt about whether your proposed actions are lawful, you must seek guidance from the Chief Compliance Officer.

Fair Trade

Ampacet has an unwavering commitment to the principle that free and open competition is the cornerstone of any free enterprise system. Many countries have enacted trade regulations to protect their competitive system from collusion, coercion, deception or favoritism. These laws may pertain to virtually every phase of the Company's operations. They affect our relationships with suppliers, distributors, customers, competitors, cooperatives, franchisees and almost all others with whom we deal in our day-to-day business.

If you have responsibilities in areas affected by trade regulation or antitrust laws, you must be sufficiently knowledgeable of applicable local and foreign laws. This will enable you to avoid potentially unlawful conduct and to identify any possible unlawful conduct of another having detrimental impact on the Company. If you have questions regarding any specific practices, contact the Chief Compliance Officer.

Antitrust Laws

As a company with global operations, Ampacet is subject to the anti-trust and fair trade laws of each country where it conducts business. Generally these laws embody the idea that the economy and the public good will be fostered best by a free and competitive economic system. All individuals and companies have the absolute right to compete lawfully for business as long as their actions and activities do not unlawfully interfere with the rights of others to compete.

Antitrust laws generally provide that any contract, combination or conspiracy that is an unreasonable restraint of trade is illegal and that it is a crime for any person (individual or corporation) to monopolize, attempt to monopolize, or combine or conspire with any other persons to monopolize, any part of a relevant market. Under these laws, companies may not enter into agreements with other companies, including their distributors and remarketers, however informally, that unreasonably restrict the functioning of the competitive system.

Price Fixing

Two or more competitors may not agree to fix prices. Furthermore, there must not be any discussion with competitors with regard to prices or rates in U.S. domestic or import/export trades. These prohibitions also apply in some of the other countries where Ampacet operates. Never propose or enter into any agreement with a competitor to fix prices, terms and conditions of sale, costs, profits or profit margins, product, production or sales volume, production capacity, market share, decisions to quote or not to quote, sales territories, distribution methods, or other aspects of competition between Ampacet and competitors. Even where there are perfectly legitimate reasons to communicate with the competition, (for example, where customer or supplier issues arise from a genuine buyer-seller relationship, or for the exploration of a potential joint venture) take care to avoid the appearance of improper conduct and make sure there is a legitimate business reason for all such communication. Do not enter into any agreements or understandings with customers or vendors to restrict the price at which the customer or Ampacet may resell a product.

Division of Markets

Two or more competitors may not agree among themselves as to the markets or areas that each will serve. This prohibition includes agreements to restrict the amount of service each is to render in the same market.

Tying Devices

A tying device or arrangement involves an agreement under which a customer is forced by a seller to buy a product or service it might not otherwise wish to buy, as a condition of buying a different product or service from the seller which the customer wants to obtain and cannot obtain elsewhere at a competitive price. With regard to joint product promotions, all such promotions must be cleared through the Chief Compliance Officer or any other person(s) he may from time to time authorize to review such activity.

Anti-boycott Laws

Ampacet will comply with the laws that prohibit activities associated with organized foreign economic boycotts, including refusing to do business with boycotted countries, their nationals or blacklisted companies or providing information about the Company or any individuals who work for the Company.

U.S. law prohibits U.S. firms and persons (and their controlled foreign subsidiaries) from complying with foreign countries' boycotts against countries friendly to the United States, and from providing information concerning business relationships with boycotted countries. Furthermore, under U.S. anti-boycott legislation Ampacet is required to report to U.S. government officials the receipts of any requests to participate in an antitrust boycott.

Ampacet employees and other representatives will not engage in any discussions with representatives of other companies, agencies, or governments regarding possible "restraint of trade" or anti-boycott activities. You must immediately report to the Chief Compliance Officer or any other person(s) he may from time to time authorize to receive such reports any such discussions initiated by any customer or potential customer.

Anti-money Laundering

Ampacet employees and other representatives will not engage in and Ampacet does not condone any activity by customers, suppliers, agents and others that conceals or attempts to disguise the source of illegal funds to look legitimate.

Truth in Advertising

Ampacet does not engage in false advertising. Our marketing and promotional efforts should not overstate or misrepresent our products and should not mislead our customers. This is the very foundation of our reputation for product and service excellence in the masterbatch and plastics industry: we deliver on what we promise.

VI. INTEGRITY IN THE MARKETPLACE: ANTI-CORRUPTION POLICY

Ampacet strives to conduct business with customers, suppliers, competitors and other third parties, with honesty and integrity. Ampacet expects employees to eagerly service clients and contend with competitors in a professional and ethical manner. You are encouraged to maintain cordial business relationships with everyone you encounter in the performance of your job with Ampacet.

Ampacet strictly prohibits bribery in any form by anyone and to anyone. All employees and representatives are strictly prohibited from offering to pay, paying, promising to pay, or authorizing the payment of money or anything of value to anyone in order to influence any act or decision or to secure any other improper advantage in order to obtain or retain business or secure an improper advantage in conducting business.

Ampacet will not tolerate any employees or representatives who engage in bribery or corruption involving any private, commercial, governmental or official person or entity, even if Ampacet were to benefit from such activity or if such activity may be accepted local custom.

Ampacet's abhorrence of corruption and bribery in all forms and its desire to maintain its high ethical standards is so passionate that the Board has directed the development and implementation of a separate, in-depth **Global Anti-Corruption Policy**. The provisions of that Policy, like this Code may even exceed the requirements of laws and regulations in various areas where Ampacet operates. The **Anti-Corruption Policies** address among other things:

- Gifts, meals, business hospitality and travel
- General prohibitions on bribery and other corrupt activity
- Charitable donations
- Political contributions
- Sponsorships
- Due diligence with respect to agents, representatives and other parties that the Company may do business with regarding their compliance with anti-corruption and bribery laws
- Reporting

If a copy is not provided to you, you must make sure you obtain a copy of Ampacet's **Global Anti-Corruption Policy** and that you review it and understand it. A copy of the most current and complete **Global Anti-Corruption Policy** is available from Human Resources at our global headquarters in Tarrytown, New York, in the United States. Please contact David Gilbert, Executive Director, Human Resources, email: david.gilbert@ampacet.com and phone (914) 333-1651. A copy of the **Global Anti-Corruption Policy** is also available for your review on our intranet site, Sharepoint. NOTE that due to variations in local law, there are separate **Anti-Corruption Policies** for Brazil and for Luxembourg, each of which is also available from Human Resources and on Sharepoint.

VII. INTEGRITY AND THE COMMUNITY

The Environment

Ampacet is committed to protecting the environment and health of our employees and any others who come into our facilities. Our commitment includes full compliance with all applicable laws and regulations and, in addition, observing sound environmental management practices that will allow us to operate without damage to the environment.

To further this policy, we will attempt to:

- Design, build and maintain our facilities to ensure operational safety;
- Explain our environmental policies to everyone and enforce compliance;
- Provide our employees with adequate training, enabling them to perform their work with minimum risk to themselves, to the environment or the public;
- Make environmental conservation and sound environmental practices an integral part of our business decisions; and
- Involve our employees in the overall environmental effort on an ongoing basis.
- Reduce waste and utilities consumption

If you are responsible for any Company activities and operations, you must be aware of the law related to your area of responsibility, of Ampacet policies and procedures relative to such activities and operations so you can ensure compliance with applicable laws and Company policies.

Health and Safety

All of Ampacet's employees around the world are an integral part of the Ampacet team. It is of paramount importance to Ampacet that we protect our employees and create a safe workplace and reduce work related injuries, illnesses and safety incidents. Hazardous or potentially harmful conditions should be reported immediately to your supervisor and suggestions for improvements in clean, safe and healthy working conditions should be conveyed to your regional Human Resources Administrator and Safety Coordinator.

Community Involvement

We respect human rights and recognize that the welfare of the global communities where Ampacet operates is important to our success. We encourage investing in our communities and contributing both time and resources to promote the quality of life and welfare of the people who live there. It is one of our goals to establish a connection with our local communities built on trust and esteem.

VIII. RECEIPT, COMPLIANCE AND EMPLOYMENT

All employees are required to acknowledge that they have received a copy of this Global Code of Conduct and the **Global Anti-Corruption Policy** and that they will comply with both of them by signing the attached receipt or completing the electronic receipt and acknowledgment process. This acknowledgment will be retained in your local personnel file. The form of Receipt and Acknowledgment is attached. Depending on the level and the nature of an employee's specific

position and responsibilities, some employees will be required to sign the certificate on an annual basis.

Neither this Code or the **Global Anti-Corruption Policy**, nor your acknowledgment of receipt thereof nor your agreement to comply with this Code and the **Global Anti-Corruption Policy**, nor any representations made by an Ampacet representative, at the time of hire or subsequently, are to be interpreted as a contract between Ampacet and any of its employees. Your rights as an employee and the Company's rights as an employer are governed by the laws of the state and/or country of employment and the work rules of your employing unit. This Code is intended to clarify the Company's rights and expectations as an employer, but does not add to, or subtract from, employees' rights or in any way create any contractual employment rights for employees. In the United States and many other countries, employment by Ampacet is generally employment-at-will. This means that you have the right to terminate your employment at any time and for any reason, with or without notice or cause to the extent permitted by law, and the Company may exercise the same right, subject to applicable law