

Code of Conduct

***Our
Commitment
to Integrity***

Who We Are

Ecovyst is Your Catalyst for Positive ChangeSM. Our technologies play a critical role in supporting ecological health and propelling expansion and growth for our customers. We aren't just ready for change – we strive to lead it.

At Ecovyst, we are prioritizing and accelerating our growing and greening initiatives and are putting sustainability for a safer, cleaner, healthier world at the forefront of our forward strategy.

Our Charter

This Code of Conduct serves as our ethical charter and describes our Mission, our Strategic Vision and our Core Values. Setting the foundation for our decision-making, this Code describes who we are, what we do and what we stand for as an organization.

Our Mission is to create critical and tailored products that enable us to be partners in creating novel solutions that support ecological health and growth for our customers.

Our Strategic Vision is to be collaborative and nimble in adapting to rapidly changing economic environments, supporting our customers with solutions that grow and extend their business and sustainability goals.

Our Core Values

— We aspire to **SHINE** in everything we do by living our Core Values of **Stewardship, High Standards, INtegrity and Engagement**

Leadership

Our Leaders hold themselves accountable for promoting and modeling our Core Values, including putting safety and environmental stewardship first and making decisions with integrity. They make our people their priority and strive for excellence in delivering on our commitments.



A Message from Our CEO



KURT BITTING
Chief Executive Officer and Director

Dear Colleagues,

At Ecovyst, ethics and integrity aren't aspirations – they're an integral part of who we are and the way we do business. Just as we are a Catalyst for Positive Change for our customers, we also have a unique and important responsibility to SHINE by advancing our shared Core Values of **Stewardship, High Standards, INtegrity, and Engagement**.

I am proud to present to you this Code of Conduct, which contains the guiding principles of how we do business. In this document, you will see the promises we make to each other, our investors, our customers, and the communities where we operate. In short, we commit to:

- Provide safe workplaces and respect the environment in the communities where we operate;
- Compete fairly and never participate in corruption, fraud, bribery, kickbacks or other illegal activities;
- Avoid conflicts of interest;
- Respect human rights; and
- Deal only with persons, companies and countries that are not subject to national or international trade sanctions.

Operating honestly and with integrity are among my highest priorities for everybody at Ecovyst, and I ask that you make it part of your daily commitment as well.

This Code of Conduct is an important part of our Commitment to Integrity. Please read it thoroughly and take it seriously. It sets the standards for our conduct, and we will all be expected to adhere to these standards. It does not cover every situation, but the Code does make clear the many avenues available if you need guidance. It also explains how and where to report any concerns—without fear of retaliation—and, if you wish, without disclosing your identity.

If you see illegal or unethical activities by anybody within Ecovyst or anybody Ecovyst does business with, it is your responsibility to report it by contacting your supervisor, our ***Ecovyst EthicsPoint Helpline*** or Joe Koscinski, our **Chief Compliance Officer**. Each of us has an obligation to report, in good faith, any ethics or compliance concerns. All reports will be investigated, and the Code will be enforced fairly and consistently.

Thank you for always upholding Ecovyst's high standards of ethics and integrity.

A handwritten signature in black ink, appearing to read 'K. Bitting', with a stylized flourish at the end.

Chief Executive Officer and Director

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Our Commitment

At Ecovyst, we are committed to doing business the right way. We have carefully cultivated a well-earned reputation for conducting business honestly and with integrity. Each of us is responsible for preserving and advancing that culture. This global code of conduct is issued by Ecovyst Inc. to each director, officer and employee of Ecovyst and its subsidiaries. Therefore, this Code applies to all employees worldwide in the Ecovyst family of companies, and it is to be implemented by controlled affiliate. If you have any questions about it, please address them to your local human resources group or contact the legal compliance department of Ecovyst as described on the last page of this document.

All employees are required to adhere to ethical standards of conduct when dealing with each other and with the Company's customers, vendors, suppliers, competitors, and other third parties. Employees are expected to always act in a manner that reflects the Company's values and attitudes as a responsible member of the communities in which we operate. It is the Company's policy to be lawful, highly principled, and socially responsible in all of its business practices.

Our Commitment to Integrity

At Ecovyst, doing business ethically is a commitment as fundamental as the quality of our products and services. Our good reputation and commitment to integrity are precious assets, and we must work together to further cultivate a culture that reflects our Mission and Core Values.

It is the policy of Ecovyst to comply with all applicable laws, including legal standards relating to safety, protection of the environment, employment, competition, securities and human rights. No Ecovyst employee has the authority to violate any law or to direct another employee or any other person to violate any law.

Every Ecovyst employee, officer, and director must:

- Act in good faith in the performance of their duties;
- Comply with both the letter and the spirit of this Code of Conduct;
- Act in compliance with all applicable laws and regulations;
- Be honest in our business dealings, and be forthcoming and proactive if we find we cannot meet a commitment; and
- Treat colleagues, customers, business partners, suppliers, regulators, and our communities fairly and respectfully.

Even with clear Core Values, appropriate policies, and strong support from Ecovyst senior management, knowing what is right and doing what is right isn't always easy. Not everyone will see a situation in the same way, and every day we face conflicting pressures and points of view. The purpose of this Code of Conduct is to provide general and initial guidance for everyone.

If ever you have a question or concern about our commitment to compliance with this Code of Conduct—or how a particular commitment in this Code applies to something you or another Ecovyst employee or business partner are doing—please bring your question or concern to your supervisor, any other member of Ecovyst management, Human Resources, our Chief Compliance Officer, or another member of our Executive Leadership Team, or please feel free to use our *Ecovyst EthicsPoint Helpline* (by telephone or through the internet), as described more fully below, in the section entitled, “Our Duty to Speak Up.”

Ecovyst’s Ethics & Compliance Program

Chief Compliance Officer Joe Koscinski, who reports to the CEO and routinely provides updates to the Board of Directors, leads Ecovyst’s corporate ethics and compliance initiatives. A Ecovyst's Chief Compliance Officer, he assesses Ecovyst’s overall compliance with applicable law and this Code of Conduct, oversees the compliance training program and other elements of the Ethics & Compliance Program, and considers and oversees the appropriate response to compliance matters and legal developments.

Each suspected or alleged allegation of noncompliance is thoroughly and impartially reviewed using either internal or external resources and appropriate corrective actions are implemented based on the results of each review.



Our Core Values – “SHINE”

Our cornerstone values — **Stewardship, High Standards, INtegrity, Engagement** — are reflected across our people and our culture. These principles and the pride they foster benefit our customers, our suppliers, our employees, and the communities where we live and work.

Stewardship

Careful and thoughtful stewardship of our products and facilities supports our customers and communities while promoting long-term value for our shareholders.

We seek new solutions to develop better and more sustainable products and services in our ever-changing world. We are committed to continually improving the way we conduct our business, from finding the most sustainable and cost-effective sourcing and manufacturing techniques to providing the highest-quality products and services.

We earn and retain the loyalty of our customers by adapting to their needs, exceeding their expectations, and supporting ecological health and their sustainability goals.

High Standards

Ecovyst strives to set and outperform high standards across all of our operations. This leads us to challenge ourselves and the status quo by making continuous improvements to deliver world-class results that benefit our stakeholders.

We know that doing business according to these Core Values means that sometimes we must make difficult decisions or make suggestions that challenge the *status quo*.

To this end, we promote a working environment that encourages offering new ideas, asking for help, being accountable for our actions, setting high expectations, and learning from experience.

INtegrity

Integrity is at the foundation of everything that we do at Ecovyst. Our valued relationships with our customers, suppliers, employees, and other stakeholders are built on our reputation of integrity. Integrity requires us to always have the courage to make the honest and correct choice regardless of the difficulty of the situation.

We expect all employees to make decisions and behave in a way that always promotes the long-term value of our Company and its stakeholders. Each of us is responsible for protecting Ecovyst’s global reputation for being a good corporate citizen and for doing business ethically and lawfully.

We earn trust by treating each other, our business partners, communities, and regulators with dignity and by communicating openly and transparently.

Engagement

At Ecovyst we bring a high level of engagement to our work and relationships, which enables us to act deliberately and decisively. We strive for a diverse workforce that works collaboratively to share perspectives and insights that sparks the creativity and innovation that benefit our customers and help to create a better world.

We strive for a diverse and inclusive workforce and work collaboratively to share perspectives and insights. Our collective creativity and innovation are the sparks that help to create a better world.

Our personal growth is accelerated by learning from the breadth and diversity of individual experiences, strengths, and creativity across Ecovyst.

Our Duty to Speak Up

Each of us is a member of the Ecovyst compliance team, and upholding our global reputation as an ethical company is key to what we all do every day. The worst thing any of us can do is ignore—or cover up—a potential problem and allow it to grow.

Our success depends on each of us feeling responsible and comfortable about sharing ideas and raising concerns, even when we might be challenging the *status quo*, because that is how we can drive our continual improvement as a team and as an organization. To that end, we must speak freely whenever we have an idea, a question or concern and we must not pass judgment or take retribution against a colleague who raises a concern or question in good faith.

Raising Concerns, Asking Questions and Reporting Potential Violations

It is in our best interest as individuals, as well as the best interest of Ecovyst, to speak up and let the appropriate people know if there is—or appears to be—a problem. And we have an obligation to speak up if:

- We are unsure what action to take and need guidance; or
- We have a good-faith belief that any employee, officer, director—or someone acting on behalf of Ecovyst—has done, is doing, or may be about to do something that is unethical or violates the law, the Ecovyst Code of Conduct, or Company policy.



i We must:

- Immediately report any suspected violation of this Code of Conduct by using one of the channels described below;
- Seek guidance from our supervisor, a manager, Human Resources, the Chief Compliance Officer or another member of senior management if we are ever unsure about the right thing to do in any situation;
- Use the union or works council processes available to us, when applicable, to address concerns or report violations; and
- Keep asking questions until we get an answer that gives us confidence that our course of action is appropriate.

Ecovyst is committed to impartially and confidentially reviewing all concerns that are raised and is committed to ensuring that no acts of retribution or retaliation will be taken against anyone for making a report or raising a concern in good faith.

Resources for Asking Questions and Reporting Concerns

In addition to raising any questions or concerns with your manager, we have several resources available to you among senior management for seeking guidance or reporting issues.

Chief Compliance Officer	Joe Koscinski	+1 484-617-1270
Director of Human Resources	Andy Kripp	+1 484-617-1223
Director Internal Audit	Tony Albrecht	+1 484-617-1272

The *Ecovyst EthicsPoint Helpline* and Web Portal

The *Ecovyst EthicsPoint Helpline* and its web portal are operated by an independent provider and allow you to anonymously communicate your questions or concerns 24 hours a day, 7 days a week. You may register your concern via a secure and confidential internet portal or by calling the *Ecovyst EthicsPoint Helpline*, where trained personnel will collect your question or concern and relay it on a confidential basis to the Ecovyst Compliance Team.

To raise a concern via the secure and confidential *Ecovyst EthicsPoint Helpline* internet portal:

- Go to www.ecovyst.ethicspoint.com and click on the "Make a Report" link at the top of the page.

To call the *Ecovyst EthicsPoint Helpline*:

- North America: dial 844-733-0067
- Netherlands: dial 0800 022 9941
- United Kingdom: dial 0800 048 5521

Help us put integrity into action — do the right thing.

If you have a question or concern, or if you see or suspect misconduct, please speak up.

Prohibition Against Retaliation

We value the input of each Ecovyst colleague, and we encourage communication and candor in order to be sure issues are raised freely, without fear of retaliation for doing so. Any employee who, in good faith, seeks advice, raises a concern, or reports misconduct is following this Code of Conduct and is doing the right thing.

We take seriously our policy against retaliation. If you feel you have been the target of retribution for raising a concern in good faith, please contact the Chief Compliance Officer, Human Resources, or the *Ecovyst EthicsPoint Helpline* (by telephone or through its web portal), and we will address the situation accordingly.

Ecovyst will not tolerate retaliation in any form against any person who speaks up and will take appropriate action, based on the facts and circumstances, against individuals who retaliate—up to and including termination of their employment.

Additional Responsibilities for Supervisors and Managers

By virtue of their positions of authority, leaders must be role models of ethical behavior. An important part of a leader's responsibility is to exemplify our values and exhibit the highest standards of integrity. In these efforts, leaders should seek and will receive guidance and support from the Chief Compliance Officer, Human Resources, or other members of the senior management to ensure they have the resources needed to fulfill these responsibilities.

① Leaders must:

- Communicate our expectations for ethical conduct by holding everyone—including themselves and their peers—accountable for making sound ethical decisions;
- Ensure that employees understand that business performance is never more important than ethical business conduct;
- Make sure that all Ecovyst employees understand our Code of Conduct, policies and the laws and regulations that affect our workplace and their job responsibilities;
- Encourage employees to raise concerns, ask for guidance, and share ideas that promote and enhance our culture of integrity and compliance;
- Be alert to any situations or actions that may be unethical or illegal and take prompt and appropriate action to address such situations;
- Create an environment in which employees feel comfortable raising issues and concerns without fear of retaliation; and
- Take prompt and appropriate action to address and correct any concerns raised.



We SHINE through Our Workplace Commitments

We believe that each of our team members can be catalysts for positive change. As a company with a global reach, complemented by strong local presence, we help our customers solve complex challenges — always with an unflinching focus on safety, environmental stewardship and ethics.

Our values, policies, and practices are designed to establish and protect the high standards that are applicable to all employees everywhere we do business. In the sections that follow, we detail these shared commitments.

1. A Safe and Healthy Working Environment

Ecovyst is committed to operating in a safe and environmentally responsible manner that safeguards our colleagues, customers, communities, and other stakeholders. This is our overriding focus as we make decisions and take actions.

Working safely and with environmental protection is of the utmost importance. It is our responsibility to always be safe and environmentally sound and to require the same from our colleagues.



HSE PERFECT DAYS
Stop. Think. Act.

At Ecovyst, we strive to make every day an HSE Perfect Day. We intend to complete each day without any significant safety injuries or environmental incidents. We measure our progress toward that goal and tirelessly drive continuous improvement in health, safety and environmental performance.

An “HSE Perfect Day” is a day that is free from:

- OSHA recordable injuries
- First aids incidents requiring professional assistance
- Level 1 or greater environmental releases
- Deviations from environmental permits and/or HSE legal requirements
- HSE Notices of Violation
- Deviations from Life-Saving Behaviors
- Failure to immediately report a workplace incident

When none of these things happen, it isn't just a good day, it's an Ecovyst HSE Perfect Day.

As an organization, we have set annual Perfect Day and Total Recordable Incident Rate goals and targets that link to performance and drive accountability.

① We must:

- Act in accordance with the established Ecovyst policies and Company's governing safety and environmental stewardship.
- Make a personal commitment to Stop before performing any task; Think about the work at hand and the safest and most environmentally responsible way to do it; and then Act to reduce risk.

① We must not:

- Compromise safety for any reason. No work is so important that it supersedes our well-being.

In short, we all must follow and ensure that our colleagues comply with all applicable health, safety and environment laws and regulations, permit requirements and Ecovyst HSE policies.



2. An Inclusive, Non-Discriminatory Workplace

Ecovyst is committed to equal employment opportunity and inclusion. Both the law and Company policy require that equal opportunities be provided to all qualified individuals, without regard to race, color, religion, sex, sexual orientation, pregnancy, gender identity and expression, national origin, age, disability, ancestry, veteran status, genetic information, marital status, or any other characteristic or status protected by federal, state or local law.

① We must:

- Conduct all employment practices in a legal and non-discriminatory manner, including activities relating to recruiting, hiring, benefits, leaves of absence, training, transfer, promotion, job assignments, compensation, corrective action and dismissal.
- Help ensure that all employees have the opportunity to work in a barrier-free, non-discriminatory environment.

① We must not:

- Engage in or tolerate discrimination in the workplace.

If you observe or experience any form of discrimination, the Company encourages you to report it to Human Resources, your supervisor, the Chief Compliance Officer, or by using the *Ecovyst EthicsPoint Helpline*, so that allegations can be investigated and appropriately addressed.

3. A Workplace Free from Harassment and Hostility

We all deserve a workplace where we are treated with dignity and respect. Ecovyst is committed to maintaining an environment free from abusive, offensive or harassing behavior that creates a hostile work environment.

① We must:

- Treat our colleagues with dignity and in a manner that respects the rights of our coworkers to work in a safe and inclusive environment.

① We must not:

- Tolerate any form of harassment, such as slurs, derogatory gestures, inappropriate pictures and e-mails, bullying or the display of objects that create a hostile work environment.
- Tolerate threats, acts of violence and physical intimidation in our workplaces.



4. Protection of Human Rights

It is Ecovyst policy to comply with all applicable laws and regulations in each jurisdiction in which we operate in order to provide appropriate working conditions for our colleagues. This means that we comply with applicable laws regarding the employment relationship including those that (1) prohibit child labor; (2) set acceptable working conditions and working hours; (3) provide for fair wages, including

minimum wages and overtime; (4) prohibit forced or bonded labor; (5) permit freedom of association and collective bargaining; and (6) prohibit discrimination, harassment, and other forms of degrading or inhumane treatment. Using tools such as our Supplier Code of Conduct and contractual provisions, we also hold our business partners to the same high standards.

① We must:

- Comply with all applicable laws related to the employment relationship.
- Report any actual or suspected violations of law or Company policy to management, Human Resources, the Chief Compliance Officer, or through the *Ecovyst EthicsPoint Helpline*.

① We must not:

- Request that anyone work under conditions that violate applicable laws.

5. Protecting Company Assets

As Ecovyst employees, each of us is a steward of Company assets, both physical (such as cash, equipment, facilities, supplies) and virtual (such as financial data, product information, marketing strategies and intellectual property—including trademarks, patents, and expertise).

① We must:

- Use Company assets only to conduct legitimate Ecovyst business and ensure their efficient use, including through efforts to control costs.
- Report the loss of, or any observed misuse of, Company property or assets.

① We must not:

- Use Company assets for personal gain or in any way that does not further the best interests of the Company.
- Take advantage of an opportunity that is discovered in the course of our employment or by using corporate property, information, or position.
- Submit an expense report which is falsified, inaccurate or otherwise seeks reimbursement for a personal, unapproved, or otherwise inappropriate expense.

Misuse or theft of Company assets may result in disciplinary action, up to and including termination from employment and referral for prosecution.



6. Information Protection and Data Privacy

Each of us creates, receives, handles, and stores information through the course of our work. We must manage and protect the information that we handle or create in compliance with all applicable laws and Company policies.

At Ecovyst, we respect the privacy of our employees, former employees, and job applicants. We hold ourselves accountable

for safeguarding the personal and private information of our colleagues. Similarly, we comply with all laws and regulations regarding the collection, storage and use of personally identifiable information of our employees and anyone with whom we do business.

The Company has established information management and retention policies and procedures for ensuring that business information and records are kept for legally and contractually determined timeframes. We are all responsible for complying with these policies and procedures.

① We must:

- Ensure that all of the information we create or receive is managed and protected in accordance with applicable laws and Company policies to safeguard sensitive, personal, competitive or confidential information.
- Comply with information confidentiality requirements, even after our employment with Ecovyst ends.
- Report information security incidents as soon as we become aware of them.

① We must not:

- Share any information related to Ecovyst business outside the Company, unless authorized to do so or it has been released in authorized public documents.
- Access information we are not authorized to obtain.
- Seek or provide access to personal employee information, other than to those who have a legal right to see the information, and then only on a need-to-know basis for the performance of their job.

7. Financial Integrity

Reporting accurate, complete, and understandable information about our business, earnings and financial condition is an essential responsibility of everyone within Ecovyst. Our customers, suppliers, investors, regulators, and business partners rely on us for accurate information.

Accurate and complete financial records and reports are important for both business and regulatory reasons. Failure to comply with laws and regulations regarding financial recordkeeping and reporting can result in severe penalties for the Company and disciplinary action against employees, up to and including termination.



① We must:

- Ensure that the accounting and financial records of Ecovyst meet the highest standards of accuracy and completeness.
- Retain all financial records in accordance with the Company's policies and applicable laws.
- Raise a concern if we feel that we are being pressured to prepare, alter, conceal, or destroy documents or other financial records in violation of Ecovyst policy.
- Raise a concern if we have any reason to believe that someone has made a misleading, incomplete, or false statement in connection with an investigation, audit, examination, or filing, either internally or externally.

① We must not:

- Create or share any false or misleading financial record or tolerate such actions by any Ecovyst employee.

We SHINE through our Relationships with Customers and Business Partners

We are part of a complex global network that encompasses customers, sales prospects, suppliers, business partners, regulators, government officials in multiple countries, and the communities in which we work. When we take responsibility for legal compliance and ethical behavior as outlined in this Code of Conduct, our decisions have a powerful impact on others, which in turn reflects back on us. The sections that follow describe how we must act in relation to those outside of the Company.

1. Avoiding Conflicts of Interest

Personal relationships, interests or investments can cause us to make decisions that put our own interests ahead of the Company's. While we might think we can be objective in the face of such a potential conflict of interest, even the perception of a conflict can negatively affect the Company or us. It is the Company's policy that no employee places himself or herself in a position where their actions, personal interests, or activities are in conflict with the interests of the Company.

A conflict of interest arises when an employee's judgment on behalf of the Company is or may be influenced by actual or potential receipt of a personal benefit by the employee or a member of their family or household.

There are numerous situations that could give rise to a conflict of interest. The most common are accepting gifts from suppliers, offer of employment by another company, ownership of a significant part of another company or business, close or family relationships with outside suppliers, and inappropriate communications with competitors. A potential conflict of interest exists for employees who make decisions in their roles with the Company that would allow them to give preference or favor to a customer, supplier or other third party that does business or potentially does business with the Company in exchange for anything of personal benefit to themselves or their friends or families. Any actual or potential conflict between your personal interests and the Company is prohibited unless specifically approved or waived in writing by your supervisor, who must first consult with the Chief Compliance Officer.

In addition, employees may not have any direct or indirect interest (as an investor, lender, employee or other service provider) in any enterprise that competes with the Company or which has current or prospective business with the Company, except when the interest has been fully disclosed to and approved in advance by the Chief Compliance Officer and/or the Board of Directors of the Company. Employees also owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises. Employee may not take advantage of an opportunity that is discovered in the course of their employment or through the use of Company property, information or position.

① We must:

- Be transparent about actual or potential conflicts of interest and promptly disclose them to our supervisor for appropriate resolution, to avoid even the appearance of impropriety.
- Disclose promptly any new or changed circumstances that present an actual or potential conflict of interest.

① We must not:

- Allow our personal relationships or interests to influence the performance of our responsibilities to the Company.
- Use the Company's property, funds, or influence for personal gain.

2. Gifts and Entertainment

Modest gifts, favors, and entertainment are often used to strengthen business relationships. However, giving or accepting inappropriate, lavish, or repeated gifts or other benefits is prohibited, even if acceptable under local custom. These restrictions also extend to an Ecovyst employee's family members.

The only permitted exceptions are: (i) items approved by the Board of Directors in the proper exercise of its business judgment; (ii) providing (or accepting) normal sales promotion items, occasional but not extravagant meals, or other non-cash items, provided that the value of the gift is in line with accepted business practices (generally USD\$100 or less) and could not be construed as improperly influencing our good business judgment or any business relationship; or (iii) contributions or donations to recognized charitable and non-profit organizations.

① We must:

- Report to our supervisor the receipt of any unsolicited gift prohibited by these guidelines and either return it to the person making the gift or, in the case of a perishable gift, give it to a non-profit charitable organization.
- Comply with customers' and suppliers' ethical requirements when giving gifts or providing meals or entertainment, when we have been advised of such policies.

① We must not:

- Provide a gift, favor or entertainment to a customer, supplier, or others if it will obligate or appear to obligate them to behave or make a decision in a certain way, or if it might be perceived as an attempt to influence their fair judgment.
- Receive any gift, favor or entertainment from customers, suppliers or others that might be perceived as an attempt to influence our fair judgment or how we carry out our job responsibilities.

3. Preventing Corruption and Bribery

In short, “Bribery” is:

- Offering, promising, giving, receiving, or soliciting...
- Anything of value...
- Directly or indirectly...
- With the intent to influence...
- How someone carries out a public, commercial, or legal duty.

It is the policy of Ecovyst that we do not engage in or permit others to engage in bribery or other corrupt activities to benefit our business. All employees must conduct business in a way which will assure compliance with the United States Foreign Corrupt Practices Act and the UK Bribery Act, both of which are laws that prohibit giving money or other things of value to a government official with the intention of corruptly influencing the official’s actions. In addition, the UK Bribery Act prohibits the giving of things of value to private persons for the purpose of obtaining or retaining business. Payments or acceptance of bribes to influence government officials is strictly prohibited. Any offer of a bribe or other corrupt influence should be immediately reported to the Chief Compliance Officer or through the Ecovyst *EthicsPoint* Helpline. If you are uncertain about offering, paying, or receiving any payment—or a payment that is being made on our behalf by any third party—consult the Chief Compliance Officer.

① We must:

- Use special care in Appointing Sales Representatives, Distributors, and Consultants.
 - Commission or fee arrangements may be made only with firms or persons serving as bona fide commercial sales representatives, distributors, or consultants, but these arrangements may not be entered into with any person or company in which a government official or employee is known or believed to have an interest, if Ecovyst conducts or may seek to conduct business with the government agency to which the official or employee is connected.
 - We pay our representatives by above-board means.
 - All commission and fee arrangements with representatives must be covered by a detailed, written agreement.

① We must not:

- Offer, pay, or accept bribes or improper payments in the course of doing business, and we must not engage others or allow others to do so on our behalf.
- Offer any direct or indirect payments—including Ecovyst funds, personal funds or anything else of value—to any government



official, employee, political party, or candidate of any country, nor to any private entity or party—in order to:

- obtain or retain business for Ecovyst or any of its subsidiaries or affiliates; or
- direct business to any other person or entity.
- Authorize such payments to be made through a third person, if we know or have reason to suspect that any portion of the payment will be used to do so.
- Engage in commercial bribery.
 - We do not directly or indirectly pay bribes, kickbacks, or similar payments or gratuities (which includes certain gifts or entertainment beyond those that are appropriate under Ecovyst policy)—directly or indirectly--to people or organizations in order to gain or keep business or to direct business to any other person or company. This policy applies both to payments made directly and to payments made through a third party.
- Pay Bribes or Kickbacks to Government Agencies, Employees, or Officials.
 - We do not directly or indirectly offer or give any money, gift, favor, entertainment, loan, gratuity, or other item of value to any employee of any country, state or local agency that regulates or does business with Ecovyst.

4. Preventing Money Laundering

Money laundering is conduct designed to disguise proceeds of criminal activity by individuals or entities. We must not condone, facilitate, or support money laundering.

Two areas that deserve special attention are:

- Unusual ways in which payments may be requested; and
- Customers who appear to lack integrity in their operations.

① We must be alert for:

- Requests for cash payment, travelers' checks or checks from an unknown third party.
- Complex payment patterns.
- Unusual transfers to or from countries not related to the transaction.
- Customers or suppliers who seem eager to avoid recordkeeping requirements.
- Transactions involving locations previously associated with money laundering or tax evasion.
- Transactions which are inconsistent with usual business practices, or which do not match the customer's or client's normal pattern of activity.
- Potential suppliers who provide false information in attempting to obtain contracts with Ecovyst.

5. Protecting Intellectual Property

Our intellectual property is important to the success of our business. “Intellectual property” includes copyrights, patents, trademarks, trade secrets, design rights, logos, expertise, and other intangible industrial or commercial property. We must protect and, when appropriate, enforce our intellectual property rights.

We must:

- Protect intellectual property from illegal or other misuse by making sure it is identified by appropriate trademark, service mark, copyright notice or patent marking.
- Disclose to management any innovation developed on Company time or using Company information or resources, so that the Company can decide whether to seek formal protection.
- Obtain licenses to use intellectual property belonging to someone else or purchase the outright ownership of the property. In the case of property rights with an expiration date, such as patents, we must be sure that this date has passed if licensing or outright purchase is not feasible.

We must not:

- Knowingly infringe upon the intellectual property rights of others.
- Use Company resources or time to create or invent something unrelated to our business.
- Use a previous employer's intellectual property without that company's permission.
- Make copies of software or licensed information, except as specified in the licensing agreement.
- Photocopy magazine/journal articles or other publications unless we have the authority or license to do so.
- Hire a competitor's employee to obtain that competitor's trade secrets.
- Use the trademark of another company without authorization.
- Erroneously allege patent infringement or mark a product with an untrue patent notice.

6. Competition and Fair Dealing

Ecovyst's policy is to comply with all antitrust and competition laws that apply to its activities. Although competition laws around the world differ, most are similar in key respects: to ensure that markets for goods and services operate competitively and efficiently so customers enjoy the benefit of open competition among their suppliers. In the United States and some other jurisdictions, violations of competition laws can lead to substantial civil liability – triple the actual economic damages. Moreover, violations of competition laws may be treated as criminal acts that can result in criminal liability for both corporations and individuals.

The Company supports competition based on high quality, responsive service and competitive price. We conduct our affairs honestly, directly and fairly. Gaining a competitive advantage by selling better products or operating more efficiently is lawful and an appropriate goal for any competitor. However, we must be mindful of the appropriate boundaries for our competitive behavior.

① We must:

- Always deal fairly with Company customers, suppliers, competitors, and employees.
- Comply with each country's laws prohibiting improper interference with a competitor's, customer's, or supplier's business relationships.
- Be accurate and truthful in all advertisements, marketing materials and dealings with customers and be careful to accurately represent the quality, features and availability of Company products and services.
- Resist any possible efforts by competitors to engage in anti-competitive activities.

① We must not:

- Take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practices.
- Arbitrarily refuse to deal with or purchase goods and services from others simply because they are competitors in other respects.
- Require others to buy from us before we will buy from them.
- Require customers to take from us a product or service they don't want just so they can get one they do want.

- Discuss with competitors any matter directly involved in competition between us and the competitor (e.g., sales price, marketing strategies, market shares and sales policies). Agree with a competitor to restrict competition by fixing prices, production



volumes or capacity, who to sell to or where to sell. allocating markets, or other means. To "agree" with a competitor in this context can mean not only formal contracts, but also oral agreements and informal understandings. Even casual discussions with a competitor may be used as evidence that there was an agreement on the topic that was discussed.

If you have any questions regarding competitive practices, it is important to discuss them with the Chief Compliance Officer in order to avoid any violation or appearance of any violation of competition laws.



7. Gathering Business Information Ethically and Lawfully

As part of the daily execution of our business, we gather information about competitors, suppliers, and customers, and we must do so in ethical and lawful ways. Most useful information is available from public sources through hard work and persistence.

In the United States and other jurisdictions, individuals and companies

who improperly take the trade secrets of another are subject to civil lawsuits for damages and injunctions, as well as potential criminal liability.

① We must:

- Protect information provided to Ecovyst on a confidential basis by adhering to confidentiality agreements relating to the information.
- Report the receipt of any erroneous communications or those that contain proprietary or sensitive information to the Chief Compliance Officer so that appropriate action can be taken.

① We must not:

- Seek, obtain, or use any information from non-public sources if it would violate any applicable law, including competition laws, trade secret, industrial espionage, or other confidential information laws, and laws relating to data privacy.
- Improperly take confidential information from others or bring any confidential information from a previous employer to the Company.
- Accept or misdirect communications not meant for us.

8. Insider Trading

It is against this Code of Conduct and Ecovyst policy for any employee or director, either personally or on behalf of others, to violate insider trading laws by trading in Ecovyst's or another party's securities while in possession of material nonpublic information about Ecovyst or that other party. It is also illegal and a violation of this Code of Conduct to communicate (or "tip") material nonpublic information to another person who trades in securities on the basis of the information or who in turn passes that information on to someone who trades.

The Ecovyst Insider Trading Policy provides additional details about our responsibilities to avoid insider trading.

9. Complying with Trade Sanctions and Controls

It is Ecovyst policy to comply with all laws governing the import and export of our products, technologies and raw materials. The United States and other countries maintain laws and regulations that restrict exports of certain products, services, and technologies to certain countries or buyers. Such restrictions can range from almost total bans on the sales to certain embargoed countries to prohibitions on selling certain items to specified individuals or organizations. In addition, it is Ecovyst policy not to participate in secondary boycotts such as the policy of certain countries to refrain from doing business with Israel.

The severity of the controls varies greatly, depending on the nature of the goods and data and their ultimate destinations. The sanctions for violating these controls, even when inadvertent, can be severe and can result in fines, imprisonment, and even the denial of all export privileges to a company or individual employee.

① We must:

- Operate our business in compliance with all applicable trade-related laws, including import, export, sanctions, and embargoes.
- Direct any inquiries to the Chief Compliance Officer regarding whether a transaction on behalf of the Company complies with applicable sanction and trade embargo programs in effect.

① We must not:

- Comply with requests to export goods, services or technologies to countries or persons who are subject to US or applicable international trade restrictions.
- Report to the Chief Compliance Officer every request for delivery of a product, service or technology to a country or person who is subject to US or applicable international trade restrictions.



We SHINE in our Relationships with our Communities, Regulators, and the Public

Each of us must share in the responsibility for protecting Ecovyst's reputation as a good corporate citizen and neighbor. We have tirelessly worked to earn this trust and maintaining it is essential to our Company's long-term success. The following sections describe our commitment to maintaining that trust with communities, regulators and the public.

1. Environmental Protection

At Ecovyst, we strive to be safer, healthier and greener while also creating meaningful sustainability impact for a better tomorrow.

We strive to manufacture, market and distribute products in a responsible manner that protects the environment and safeguards the health, safety and security of employees, contractors, customers and the community.

Our **Guiding Principles** focus on safety, personal accountability and HSE performance. We center on continual improvement and voluntary participation in Responsible Care®, RC14001® and ISO14001.

We are committed to protecting the environment and the health and safety of our communities and the public, just as we are with the health and safety of our employees and our own families. We live up to this commitment through compliance with all applicable laws and continuous improvement of our performance on environmental, health and safety matters.

To meet these standards, every Ecovyst facility must demonstrate compliance with all public health and environmental laws pertaining to its operations and, consistent with applicable law, maintain an open dialogue with local communities on the nature and hazards of the materials that it manufactures or handles.

2. Sustainability

Our engagement in sustainability is a natural part of our daily business and is reinforced through our strategy and living our Core Values.

We create sustainable products that are safe for the environment, reduce waste and increase efficiencies for our customers and stakeholders. Our products contribute to lower emissions and cleaner air, advance the global transition to clean energy, support the circular plastics economy and ensure clean, purified drinking water.

Our key businesses, Ecoservices and Catalyst Technologies, are each advancing sustainability through their business practices.

We are continually improving the way we conduct our business, adapting to the changing demands of the global marketplace, by bringing our creativity and innovation to meeting and exceeding our stakeholders' expectations for reducing our environmental footprint.

This commitment includes seeking more sustainable manufacturing techniques that reduce our impact on the environment. Our goals for energy reduction, as well as our water, waste, and emissions goals, are also aligned with supporting our customers' commitments to achieving their own sustainability goals.

3. Political Activity and Community Engagement

It is Ecovyst policy to comply with all laws regulating corporate and employee participation in political activities and public affairs. Ecovyst encourages employees to exercise their rights and assume their obligations as citizens, however:

❗ We must not:

- Make political contributions on behalf of the Company without obtaining prior written approval by the Chief Compliance Officer.
- Be reimbursed by expense accounts or otherwise for personal political contributions.

4. Interacting with Regulators and Other Government Personnel

We are committed to maintaining an open, constructive, and professional relationship with regulators on matters of regulatory policy, as well as being respectful and cooperative when interacting with any other government personnel.

When dealing with public officials, we adhere to the highest ethical standards of business conduct. When we seek the resolution of regulatory or political issues affecting the Company's interests, we must do so solely based on the merits and pursuant to proper procedures in dealing with such officials.

❗ We must:

- Be alert to any changes in the law or new requirements that may affect our business.
- Notify our manager or the Chief Compliance Officer if we become aware of any regulatory or legal concerns, including investigations.
- Contact the General Counsel if we are contacted by any regulatory agency or government official seeking information regarding the Company or its employees.
- Contact the General Counsel immediately if we receive any communication, subpoena, summons or other inquiry as a representative of the Company from a law enforcement official, court, sheriff, or lawyer.

❗ We must not:

- Offer, provide, or solicit—directly or indirectly—any special treatment or favor in return for anything of economic value or the promise or expectation of future value or gain.

Conclusion: Deciding what is Right

Making Ethical Decisions

How do we decide what is “right,” when the rules or policies are not clear? Or when doing the “right” thing might require challenging the *status quo*?

① **When you find yourself confronted by a compliance challenge or an ethical dilemma and you aren’t sure whether your plan of action (or someone else’s) is right, ask yourself the following:**

- **Law, Code, or Company Policies:** Would the planned action violate applicable law, the Code of Conduct or a Company policy? If so, then the plan of action should be clear and you should act in the ethical and compliant manner.
- **Core Values:** If there is no clear rule that applies to the situation, would the planned action violate any of our Core Values? Remember, our Core Values set our ethical standards and go beyond just doing what is legally required.
- **Other Perspectives:** Have you discussed your decision with a trusted colleague or appropriate member of the management team? Usually, getting other perspectives can help ensure that your reasoning is thorough. Our Value of Learning and Imagination reminds us that sharing ideas could lead to a stronger affirmation of the solution we were considering; or it could give us an idea that we had not even considered. In either case, we will come to a better decision.
- **Take Accountability:** When you have finally made your decision about the action to take, would you be comfortable taking accountability for your decision and your rationale?

If you feel that you’re unable to make the right decision, you aren’t comfortable that you or others are doing the right thing or you fear retaliation if you do what you think is right, please seek help from the resources that are available to you and contact the Chief Compliance Officer, Human Resources or the *Ecovyst EthicsPoint Helpline*.

Resources for Asking Questions and Reporting Concerns

In addition to raising any questions or concerns with your manager, we have several resources available to you among senior management for seeking guidance or reporting issues.

Chief Compliance Officer	Joe Koscinski	+1 484-617-1270
Director of Human Resources	Andy Kripp	+1 484-617-1223
Director Internal Audit	Tony Albrecht	+1 484-617-1272

To raise a concern via a secure and confidential internet portal go to www.ecovyst.ethicspoint.com and click on the “Make a Report” link at the top of the page.

To call the *Ecovyst EthicsPoint Helpline*:

- North America: dial 844-733-0067
- Netherlands: dial 0800 022 9941
- United Kingdom: dial 0800 048 5521

Applicability and Enforcement

Applicability of this Code of Conduct

The obligations in the Code apply to the entities, directors, officers and employees of Ecovyst, its subsidiaries, controlled affiliates, joint ventures and all other entities that are directly or indirectly controlled or managed by Ecovyst. Each of us will be asked to certify to this commitment periodically.

No director, officer, manager, supervisor, or employee has the authority to violate—or require conduct by others that violates—the Code, other Ecovyst Policies, or applicable laws.

Waivers of this Code with respect to any member of the Company's Board of Directors or any executive officer of the Company may be made only by the Company's Board of Directors or a committee thereof and will be disclosed in accordance with applicable law and rules promulgated by the Securities and Exchange Commission and the New York Stock Exchange.

Suppliers, contractors, and other third parties must behave in accordance with Ecovyst's Core Values in their work on behalf of Ecovyst through compliance with this Code of Conduct and the Ecovyst Supplier Code of Conduct, to which they may be asked to periodically certify their compliance.

Discipline for Non-Compliance

Failure to comply with laws, the Code of Conduct or Company policies may result in disciplinary action, up to and including termination of the relationship with the Company. Civil or criminal violations may also be prosecuted.

Investigation of Non-Compliance

It is Ecovyst's policy and intent to investigate any reported violation of the Code of Conduct, other Ecovyst Policy or applicable law and to take appropriate action based on the results of the investigation. Reports of violations of accounting, accounting controls, and audit matters will be investigated under the supervision of the Audit Committee of the Board of Directors. All other violations will be investigated under the supervision of the Chief Compliance Officer. Employees are expected to cooperate in the investigation of reported violations. The investigators will not disclose the identity of anyone who reports a suspected violation or who participates in the investigation, unless required to do so by applicable law.

Disclosures

Employees should be aware that the Chief Compliance Officer and the Audit Committee are obligated to act in the best interests of Ecovyst and do not act as personal representatives or lawyers for Company employees.

This Code does not create a contract, nor does it alter the terms and conditions of our employment; rather, it helps each of us to know what is expected of us—and what we can expect of one another—to make sure we always act with integrity.

This Code was adopted by the Board of Directors of Ecovyst on October 26, 2022.