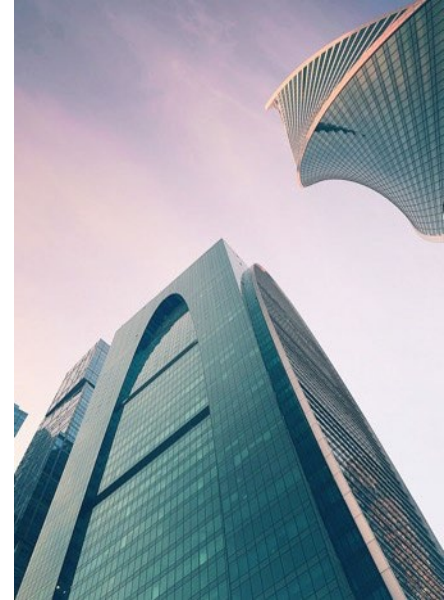




# Code of Business Conduct & Ethics

September 2023



# WHAT WE'LL COVER

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# Message from the CEO



# Message from the CEO

Axalta's (the "Company") most important asset is the trust of our customers and business partners, as well as the trust of our employees and our trust in each other, and it is up to each of us to safeguard that trust. This means that we do the right thing, as we have for the more than the 150 years that we have been in business. We act with integrity, and we hold ourselves to the very highest standards. We empower our people to do the right thing for our colleagues, our customers, and our communities.

We are operating in a world where the only constant is change. And we are subject to complex laws and regulations everywhere we operate. How we should respond to a given situation, what would be the right choice, or the right thing to do, may not always be clear. However, our core values and operating principles, which are embodied in this Code of Business Conduct and Ethics (the "Code") and Axalta's other policies, are enduring and should guide us in all situations and decisions.

The Code anchors our Compliance program and is supplemented by our policies and procedures, which together with the Code, should guide our conduct in all settings. Our Legal Department is always available to assist you in understanding your legal and ethical obligations. If you are unsure of what to do, reach out to local Human Resources, your manager, your Regional Compliance Officer, another member of the Legal Department, or the Chief Compliance Officer. Our Code has the full support of Axalta's leadership team and Board of Directors and must be adhered to by all Axalta employees, officers, and directors worldwide.

Thank you for always acting with integrity and helping us uphold our values and our reputation.

Sincerely,

A handwritten signature in black ink, appearing to be 'J. H. ...', written in a cursive style.

# Axalta's Values



# Axalta's Values

Our values are a commitment we make to ourselves and to everyone with whom we engage, from our customers to suppliers, from leaders in communities in which we live and work, to our newest colleagues. The languages and cultures in which we do business differ, but the values we share, as a global Company, remain the same.



As Axalta employees, we...

## Do what's right.

Do the right things for our customers, each other and the planet

- Lead with safety
- Drive for excellence
- Act with integrity

## Act boldly.

Take data-driven risks and actions

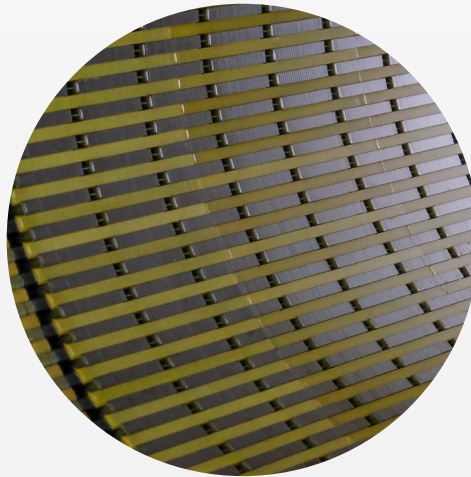
- Challenge the expected
- Take action
- Own it

## Win together.

Foster teamwork and collaboration

- Trust in one another
- Create belonging
- Celebrate success

This Code  
Applies to All  
of Us



## THIS CODE APPLIES TO ALL OF US.

This Code governs how all full-time and part-time employees, as well as members of the Board of Directors of Axalta or any Axalta majority-owned subsidiaries and joint ventures (collectively “Employees”), should conduct business. More specific rules and day-to-day procedures are outlined in Axalta’s policies and procedures, some of which are included in Appendix A to this Code. Appendix A is not a complete list of all of Axalta’s policies and procedures and does not include any new policies and procedures that may be created and implemented in the future.

Axalta expects its suppliers, contractors, consultants, and other business partners to follow the principles of the Code when providing goods and services to Axalta or acting on our behalf. Axalta also requires its suppliers to comply with its [Supplier Code of Conduct](#).





# THIS CODE APPLIES TO ALL OF US

## ADMINISTRATION OF THE CODE.

Our Board of Directors has established the standards set forth in, and has approved, this Code and, directly or through its Audit Committee, oversees its compliance. The Board of Directors has tasked senior management with ensuring that the Company's activities are conducted in accordance with this Code and other corporate policies and has delegated day-to-day responsibility for administering and interpreting the Code to our General Counsel.

## EMPLOYEE RESPONSIBILITIES.

At Axalta, we conduct business ethically, honestly, with integrity, and in full compliance with all laws that apply to us wherever we do business. This Code sets forth the key ethical principles and rules that should govern our behavior. This Code is not intended to cover every law that applies to Axalta, or to address every ethical issue that might arise. It is also not a replacement for good judgment. This Code provides guidance and directs Employees to the appropriate resources.

At all times, we must conduct our business in an ethical manner that reflects favorably upon both Axalta and us. If you are ever unsure whether an act is ethical, ask yourself the following questions:

- Is the action legal?
- Does the action comply with the Code and all applicable Axalta policies and procedures?
- Would the action withstand public scrutiny if disclosed?
- Will the action reinforce Axalta's reputation as an ethical Company?

If you cannot answer these questions with an unqualified yes, then you should seek guidance by discussing the situation with local Human Resources, your manager, your Regional Compliance Officer, another member of the Legal Department or the Chief Compliance Officer before proceeding.

## ADDITIONAL RESPONSIBILITIES FOR MANAGERS.

All Employees who have supervisory authority over others have special responsibilities under this Code to lead by example, to escalate issues, and to maintain an ethical work environment at Axalta. They must ensure that the Employees they supervise understand and follow the Code and that they complete all required compliance training. In certain instances, they may be responsible for the failure by any such Employee to follow the Code.

Managers must encourage and create an environment that allows Employees to ask questions, make suggestions, and report wrongdoing. Managers have a responsibility to escalate appropriately any allegations of wrongdoing or violations of the Code, Axalta policies, or the law. Managers should report these allegations to local Human Resources, their supervisor, the Regional Compliance Officer, another member of the Legal Department, or the Chief Compliance Officer.

## SPEAK UP - REPORT CONCERNS AND VIOLATIONS.

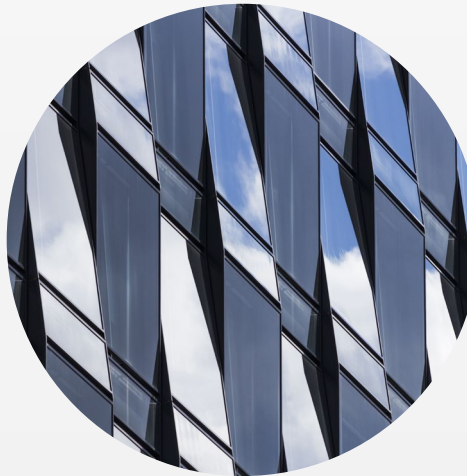
Axalta's Ethics Helpline is available 24 hours a day, 7 days a week, 365 days a year. At Axalta we have an open-door policy for reporting any and all concerns or potential issues. In addition to the Ethics Helpline, you may raise issues or concerns by reaching out to local Human Resources, your manager, your Regional Compliance Officer, another member of the Legal Department, or the Chief Compliance Officer.

If you are or become aware of any actual or potential violation of this Code, Axalta's policies, or the law, then it is your responsibility to report the violation immediately and without regard to the identity or position of any potential offender(s). Axalta does not tolerate retaliation against any Employee who makes a good faith report about a violation or possible violation of applicable law, the Code, or any other Axalta policy.

### AXALTA'S ETHICS HELPLINE

Axalta's Ethics Helpline: You can reach the helpline by going to [www.axalta.com/helpline](http://www.axalta.com/helpline) (for international dialing) or by calling toll free 1-800-461-9330 (for US, Mexico, and Canada) to speak to a representative. The call center supports multiple languages and international dialing instructions can be found by going to [www.axalta.com/helpline](http://www.axalta.com/helpline) where you can choose your location from a list of countries and find the international number assigned to your country.

We Live Our Values  
and Are Good  
Citizens of Our  
Communities



# We Live Our Values and Are Good Citizens of Our Communities

Axalta operates in an ethical manner and expects Employees to conduct themselves in a way that promotes accountability, integrity, and trust—for each other, as well as for our business partners, regulators, and customers. Below are some of Axalta's guiding principles that we expect Employees to follow as we interact with people both inside and outside of Axalta.

## WE DO WHAT'S RIGHT AND ACT WITH INTEGRITY.

Employees should always be mindful that their actions, whether intentional or inadvertent, could impact Axalta's reputation. Even more importantly, Axalta and its Employees have an obligation to each other, our customers, and third parties to act ethically. Employees at Axalta are responsible for being honest and truthful when interacting with others. Even when challenging situations arise, we expect Employees to rise to the occasion and make ethical decisions.

### SPEAKING UP!

If something does not look or feel right, then take action by using the appropriate channels and resources. If permitted under local law, then you can choose to remain anonymous when you report a concern. Your anonymity and the information you share will be kept confidential to the extent possible, and retaliation against you will not be tolerated.

## WE VALUE DIVERSITY AND INCLUSION.

The diversity of our workforce is among our greatest assets. We respect the unique attributes and perspectives of every Employee and believe that our Employees' diverse perspectives bring significant value to Axalta. We are committed to providing equal opportunity in all aspects of employment. Providing people with equal opportunities to develop their full potential encourages higher quality and more productive work, reduces Employee turnover, and increases Employee morale and engagement. Subject to applicable law, we make all employment-related decisions and actions without regard to personal characteristics, such as race, gender, gender identity, religion, national origin, sexual orientation, disability, or any other characteristic protected under applicable law, and we do not tolerate discrimination in our selection, training, and promotion processes.

We will not tolerate harassment—whether by words, actions, or behavior—or unlawful behaviors of any kind, including derogatory comments based on race or ethnicity, offensive jokes, or display of materials that offend a particular characteristic protected by applicable law, or sexual harassment. Sexual harassment includes unwelcome touching, sexual advances or any conduct which is either of a sexual nature or which is directed at an individual because of that individual's gender, gender expression, gender identity, and/or the status of being transgender. Sexual harassment is against the law and will not be tolerated. For more information, visit the applicable policy for your locality or country. For US employees, see Axalta's [US Equal Employment Opportunity and Workplace Harassment Policy](#).



# WE LIVE OUR VALUES AND ARE GOOD CITIZENS OF OUR COMMUNITIES

## WE CREATE A WORKPLACE THAT IS SAFE AND SECURE.

Nothing is more important than the safety and health of our Employees and contractors, our customers, and the communities in which we operate. At Axalta, it is every Employee's responsibility, at all levels, to create a safe and healthy environment. Employees are required to perform their work in accordance with applicable safety standards and practices, as well as Axalta's policies. We do not tolerate violence in the workplace, which may include physical intimidation, direct or implied threats to physically harm others, bullying, stalking, or violent outbursts. Employees are entitled to a safe, secure, clean, and healthy working environment that complies with all relevant laws, rules, regulations, and policies, as well as Axalta's own standards and guidelines. All business activities must be conducted with all necessary permits, approvals, and controls. Axalta Employees are responsible for understanding and complying with Axalta's [Environmental, Health and Safety Policy](#), as well as the relevant policies and procedures of the facilities where they work.

Employees must report any unsafe conditions or behavior immediately to local Human Resources, the local Environmental, Health and Safety team, and/or their manager. In the event of imminent physical harm, Employees should immediately contact local law enforcement and report the situation to local Human Resources, the local Environmental, Health and Safety team, and/or their manager.

## WE RESPECT HUMAN RIGHTS.

At Axalta, we conduct our business in a manner that respects human rights. We support fundamental human rights for all people. We do not use slave, child, forced, bonded, indentured, or involuntary prison labor. We do not engage in human trafficking or exploitation, or import goods tainted by slavery or human trafficking. We will not do business with any third party engaging in the use of forced or involuntary labor, human trafficking, or child labor. We prohibit physical punishment or abuse. We respect the right of Employees to associate or not to associate with any group, as permitted by and in accordance with applicable laws and regulations. Axalta, and any supplier, vendor, intermediary, or service provider working with Axalta, must comply with all labor laws in the jurisdictions where it operates.

## WE ARE GOOD STEWARDS OF THE ENVIRONMENT.

We are committed to environmental stewardship and protecting environmental resources for future generations. To that end, we must follow all environmental rules and regulations established by local, regional, or national authorities, as well as Axalta's own policies, including the Axalta's [Environmental, Health and Safety Policy](#), and its reporting obligations.

## MUTUAL RESPECT.

We treat people with dignity and respect, and we set high standards for professional and ethical conduct that govern how we interact with customers, suppliers, colleagues, and members of the public. This includes extending courtesy and respect to individuals; respecting Axalta property and that of others; acting fairly and honestly at all times; working together to achieve better results and taking steps to understand the laws and customs of the different countries in which we operate.

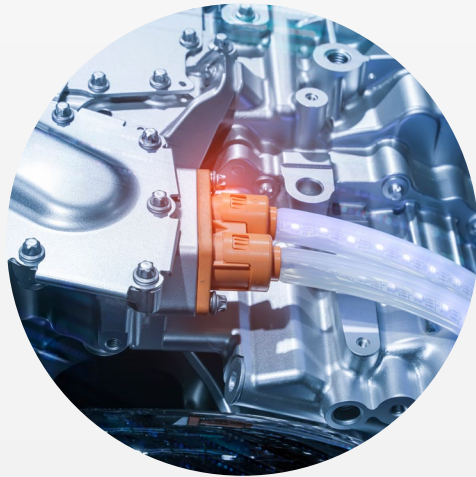
## DISCIPLINARY ACTION AND COUNSELING.

Axalta maintains standards of performance and conduct in the workplace through the appropriate use of informal counseling, Employee training, formal counseling, and disciplinary actions, which may result in penalties up to, and including, dismissal.

## WORKPLACE SAFETY:

Follow Axalta's safety procedures and practices at all times. **Stop work** if an actual or potential safety or quality problem is identified. Report any unsafe working conditions, injuries, or potential injuries to a supervisor immediately. Wear all required personal protective equipment and ensure all equipment is used and maintained safely. Be aware of and follow applicable emergency procedures.

# We Conduct Business Ethically



# WE CONDUCT BUSINESS ETHICALLY

## WE COMPLY WITH ALL APPLICABLE LAWS AND REGULATIONS.

Obedying the law is one of the foundational elements of this Code. Axalta operates in many different countries and jurisdictions, and Employees are required to comply with the applicable laws in all countries to which they travel and any location where Axalta does business. Although Employees may not know the details of all laws, rules, and regulations, it is important to know enough to determine when to seek advice.

## WE DO NOT PAY BRIBES – TO ANYONE, AT ANY TIME, FOR ANY REASON.

Axalta is committed to complying with applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act, and the anti-corruption laws of all other countries where we do business. It is never appropriate to offer, give, request, or accept bribes, kickbacks, or any other type of improper preferential benefit to or from anyone whether they are a government official, political candidate, party official, customer, supplier, business partner, or third-party intermediary. In addition to cash, be aware that gifts, business entertainment (such as meals, travel, or other hospitality), offers of employment or internships (even if unpaid), political contributions, or charitable donations may also constitute a bribe, kickback, or other type of unlawful benefit. Axalta is committed to doing business only with business partners that share our ethical values and commitment to anti-corruption compliance. For more information, see the Axalta [Anti-Corruption Policy](#) and [Gifts & Business Entertainment Policy](#).



## WE COMPLY WITH ALL IMPORT-EXPORT & GLOBAL TRADE LAWS.

Axalta's ability to conduct business around the world is a privilege that must be carefully safeguarded. We transfer products, supplies, and raw materials to and from countries all over the world every day. In so doing, we must comply with all laws, rules, and regulations that govern these activities. These laws include trade laws and export controls and anti-boycott regulations that apply whether an Employee is based in, or a citizen of, the United States or another country. The United States and many other countries also impose and enforce sanctions against certain individuals and businesses worldwide, and the scope of these sanctions can vary widely. Axalta does not do business with sanctioned individuals or businesses. Employees are required to help ensure that Axalta complies with all applicable trade laws in the jurisdictions where we do business and ensure that information provided to customs or other relevant authorities, as may be required from time to time, is current, accurate, and complete. For more information, see the Axalta [Global Trade Compliance Policy](#).

### CODE OF CONDUCT IN ACTION:

**Q:** Construction of Axalta's new factory in a foreign country is complete. However, the factory cannot open until the government safety inspector has visited the factory to inspect it and issue a safety certificate. The safety inspector wants Axalta to pay all of the expenses for the visit to the factory. Specifically, this inspector is expecting first-class air travel and lodging at a five-star hotel. Should you book a first-class ticket and five-star hotel for the safety inspector?

**A:** No, you should not. This would be a violation of Axalta's Anti-Corruption Policy and Axalta's Gift & Business Entertainment Policy. You should reach out to a member of the Legal Department for further guidance.





# WE CONDUCT BUSINESS ETHICALLY

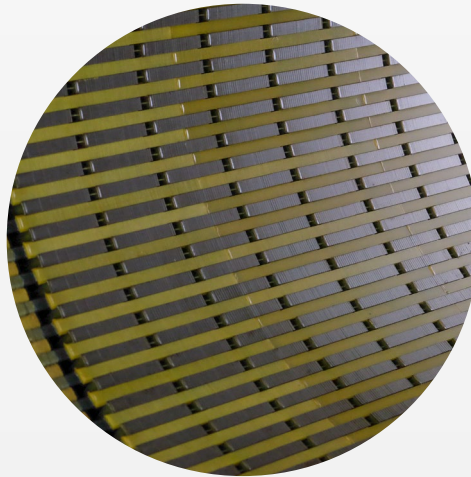
## WE COMPLY WITH ANTI-MONEY LAUNDERING LAWS.

We comply with all applicable anti-money laundering and counter-terrorism financing laws and regulations. We will not attempt to conceal or “launder” illegally received funds or make the source of the funds appear legitimate. Employees must follow all Company payment procedures. In addition, Employees should be on the alert for and immediately report any irregular payments or requests, unusual payment methods, refund requests, or other suspicious transactions.

## WE DO NOT TRADE ON INSIDE INFORMATION.

From time to time, Employees may have or receive material information about Axalta or other companies that has not been disclosed publicly. It is illegal to trade in a public company's stock or other securities with non-public, material information about the company (“Inside Information”). Inside Information is likely to be considered material if a reasonable investor would consider the information important in deciding whether to buy, sell, or hold a stock or other security. If you have Inside Information about Axalta or any other company, you must not trade in Axalta's or that company's stock, advise anyone else to do so, or communicate the information to anyone (i.e., “tipping”) until the information is disseminated to and absorbed by the public or is no longer material. Members of the Board of Directors, Executive Officers, and certain other Employees may have additional restrictions on trading in Axalta securities. For more information, see Axalta's [Insider Trading Policy](#).

We Operate with  
Transparency



# WE OPERATE WITH TRANSPARENCY

## WE AVOID CONFLICTS OF INTEREST.

Axalta respects the right of our Employees to manage their personal affairs. Nevertheless, our personal interests must never interfere (or appear to interfere) with the interests of Axalta. A conflict of interest is a situation in which we have a personal or private interest that interferes with (or appears to interfere with) our ability to make sound, objective decisions for Axalta. Employees must avoid apparent or actual conflicts of interest and must disclose potential conflicts of interest in writing as soon as possible to local Human Resources, their manager, their Regional Compliance Officer, another member of the Legal Department, or the Chief Compliance Officer so that Axalta can work with the Employee to find a solution. Executive Officers and members of the Board of Directors should report apparent or actual conflicts of interest to the General Counsel, and should be mindful of the requirements imposed by the [Related Person Transaction Policy](#).

## PERSONAL AND FAMILY RELATIONSHIPS.

All of our business decisions must be made in a fair and impartial way, based on sound management and business practices and not influenced by family or personal concerns. Accordingly, we must avoid family or personal considerations when making decisions related to Axalta business matters. We may not hire or supervise those with whom we have a familial or personal, non-work relationship. We must also ensure that those with whom we have a familial or personal, non-work relationship are reasonably separated from our scope of influence in the areas of job evaluations, pay, and benefits. We may not have direct involvement in any business decision affecting those with whom we have a familial or personal, non-work relationship. In addition, we must disclose situations where family members or someone living in our household is working for a competitor, supplier, or vendor.

When in doubt, err on the side of disclosing conflicts of interest in writing to Human Resources or the Legal Department. Did you know that there are three different types of conflicts of interests?

1. Potential Conflict of Interest: A potential conflict of interest involves a situation that may develop into an actual conflict of interest.
2. Apparent Conflict of Interest: An apparent conflict of interest arises when a reasonable person would think someone's judgment is likely to be compromised, even though it may not be.
3. Actual Conflict of Interest: An actual conflict of interest occurs when financial, personal, or professional considerations compromise someone's judgment or integrity.

## GIFTS & BUSINESS ENTERTAINMENT.

Providing and receiving modest gifts or entertainment can be beneficial to long-term business relationships, provided they are reasonable and appropriate for the situation, not offered to improperly influence a business decision, and are permissible under laws and policies that apply to both the contributor and the recipient. Gifts and entertainment should always be in good taste, should not be lavish, and should be considered courtesies, not regular practices. Gifts in cash, or cash equivalents, such as gift cards, are strictly prohibited. Any type of gift, hospitality, or entertainment is unacceptable if it could create a feeling of obligation or could compromise your business judgment. Giving or offering gifts and hospitality to government officials presents enhanced risk. For further guidance on gifts and entertainment, see the Axalta [Gifts & Business Entertainment Policy](#) and the Axalta [Anti-Corruption Policy](#).

## OUTSIDE EMPLOYMENT.

Full-time Employees must have prior written approval from their manager before providing services to another business in exchange for compensation, unless otherwise allowed under the terms of their employment or local law. Employees may never provide services to a competitor while they are employed by Axalta.

## POLITICAL ACTIVITIES.

We should keep our political activities separate from our work for Axalta. Accordingly, it is inappropriate to use Company resources (including time, property, or equipment) for such activities. Employees should notify their manager before accepting a public office. Any political activities being conducted on Axalta's behalf must be approved in accordance with Axalta's policies and procedures. Donations to political organizations on Axalta's behalf of any kind are prohibited. Those who wish to provide support to political institutions may do so on their own time or with their personal financial contributions. Employees should review Axalta's [Corporate Giving & Contributions Policy](#) for additional guidance.

### TAKE NOTE:

"Gifts" and "Business Entertainment" include anything of value provided for free or for less than fair market value. Examples include travel, lodging, meals, attendance at sporting events or concerts, gift baskets, and product samples.



## CORPORATE OPPORTUNITIES.

Employees are prohibited from (a) taking opportunities that are discovered through the use of Axalta property, information, or position; (b) using Axalta property, information, or position for personal gain; and (c) competing with Axalta. All Employees owe a duty to Axalta to advance its business interests when the opportunity to do so arises.



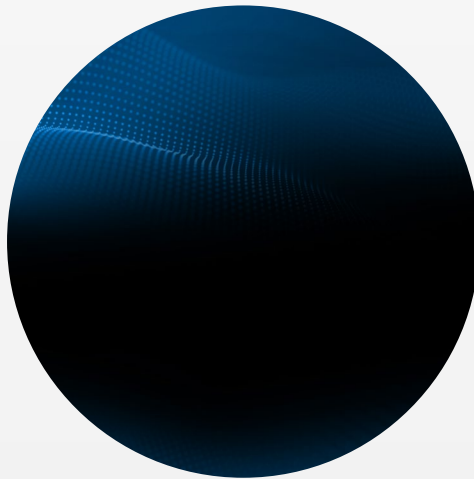
## WE MAKE & KEEP ACCURATE BOOKS, RECORDS, ACCOUNTS AND DISCLOSURES

Accurate information is essential to Axalta's ability to meet legal and regulatory obligations and to compete effectively. Axalta's books and records must meet the highest standards and accurately reflect the true nature of the transactions they record. Destruction of any books and records, or other documents (except in accordance with applicable law, regulation, or Axalta's [Record Retention Policy](#)) is strictly prohibited.

Employees must not create, use, or accept false or misleading documents, accountings, or financial or electronic records for any purpose relating to Axalta, and no one may direct anyone else to do so. Employees are responsible for the accuracy of their records, time sheets, and reports. For example, expense reports must accurately document expenses actually incurred in accordance with Axalta policies. Employees must not obtain or create "false" invoices or other misleading documentation or invent or use fictitious entities, sales, purchases, services, loans, or other financial arrangements for any purpose relating to Axalta. Employees are also responsible for accurately reporting time worked as may be required. Supervisors are responsible for reviewing expenses and confirming they comply with Axalta's [Global Travel and Entertainment Policy](#).

No undisclosed or unrecorded account or fund may be established for any purpose. No disbursement of Axalta funds or other Axalta property may be made without adequate supporting documentation or for any purpose other than as described in the documents. All Employees must comply with generally accepted accounting principles and Axalta's internal controls. We must also follow Axalta's system of internal controls and disclosure controls and ensure that all securities filings and public disclosures are timely, legitimate, and accurate. Employees should never facilitate or participate in any third-party attempts to defraud Axalta.

We Act with Integrity  
in Our Business  
Relationships





# WE ACT WITH INTEGRITY IN OUR BUSINESS RELATIONSHIPS

## GATHERING COMPETITIVE INFORMATION.

Obtaining and using information about competitors can be a legitimate part of the competitive process if gathered properly. Information should be gathered from publicly available sources or otherwise properly obtained. If you believe someone is improperly giving you confidential information, then politely decline to continue the conversation and report the incident to a member of the Legal Department.

### CODE OF CONDUCT IN ACTION:

**Q:** You are out to lunch at a local restaurant with your team. You notice that sitting directly in front of you at another table is an employee at a rival company, who is reviewing emails on a computer while eating lunch. The employee gets up to use the restroom and you now have a clear view of the rival employee's computer screen. The computer screen is showing an email with the rival company's new trade secret for a special coating that could revolutionize the industry. Should you attempt to read the email to gain a competitive advantage?

**A: *No.*** *Doing so would be unethical and possibly illegal depending on applicable laws. While we should compete vigorously with our competitors, we should always do so in an ethical way.*

## WE COMPLY WITH COMPETITION, ANTITRUST, AND FAIR DEALING LAWS.

We comply with all antitrust and competition laws wherever we do business. These laws are designed to ensure a fair and level playing field. We should always deal fairly with our customers, suppliers, and Employees. We should not take unfair advantage of anyone through manipulation, concealment, abuse of confidential or privileged information, misrepresentation of material facts, or other unfair dealing practices. Fair dealing laws and antitrust and competition laws protect industry competition by generally prohibiting formal or informal agreements that would restrain trade, such as agreements between competitors seeking to manipulate or fix prices, divide markets, or unfairly impact competitors. If you learn of or are involved in discussions where these topics arise, then you should immediately contact the Chief Compliance Officer. For more information, see Axalta's [Antitrust and Competition Law Policy](#).

We Manage  
Information and  
Assets Responsibly





# WE MANAGE INFORMATION AND ASSETS RESPONSIBLY

## WE PROTECT OUR ASSETS AND CONFIDENTIAL INFORMATION.

We must protect and exercise good judgment when using Axalta's assets. Personal use of Company assets (such as technology resources) should be minimal and not interfere with job performance. We may not use Axalta's email or electronic or physical assets to send or access offensive or inappropriate content. Also, Employees should be careful to protect Axalta's intellectual property from improper disclosure to or use by a third-party. Axalta may be entrusted with property and/or valuable information belonging to our business partners. We must use the same care to protect any property or valuable information entrusted to Axalta by others. We should maintain the confidentiality of our own information and information entrusted to us by others, except when disclosure is authorized or legally mandated.

"Confidential Information" includes all non-public information that might be of use to competitors, or harmful to the Company, its employees, or its customers or other business partners, if disclosed. This includes, but is not limited to, marketing plans, sales data, financial performance data, personal data of Employees or customers, strategies, intellectual property, and any legally privileged materials. To protect this Confidential Information, we must follow all relevant laws and respect the privacy of information when collecting, keeping, and transferring confidential or otherwise private information. We are prohibited from using Axalta's Confidential Information for personal gain or to compete with Axalta. In certain instances, we may have a duty to disclose confidential information publicly pursuant to U.S. federal securities laws; see Axalta's [Regulation Fair Disclosure Policy](#) for details regarding the disclosure obligations and considerations under such laws.

## WE SAFEGUARD OUR INTELLECTUAL PROPERTY.

Intellectual property is one of Axalta's most valuable assets and, thus, protection of our IP is a core responsibility for every Employee. Each of us is responsible for safeguarding Axalta's trademarks, patents, copyrights, trade secrets and proprietary know-how, methods, and processes. It is critical that we never disclose to unauthorized individuals—whether inside or outside of Axalta—any information that may compromise Axalta's proprietary technology or trade secrets. It is equally important that we respect the valid intellectual property rights of third parties. Unauthorized or improper use of third-party intellectual property may expose Axalta and individual Employees to civil damages and criminal penalties.

## PERSONAL DATA.

Axalta is committed to protecting the personal data of our Employees, customers, and others who entrust it to us. If you create, discover, use, access, receive, or otherwise handle personal data, then you should follow applicable privacy laws and Axalta's data privacy policies and procedures, including Axalta's [Global Privacy Statement](#).

## DATA SECURITY.

Keeping Axalta's data safe strengthens our business by building trust between our Employees, customers, and business partners. Employees must comply with all of Axalta's data security policies, including the [Global Data Classification Policy](#). Specifically, we must protect all passwords, user IDs, access cards, and encryption or authentication keys. We must safeguard all confidential and non-public information, including, but not limited to, trade secrets, contracts, manufacturing, customer, Employee, and pricing data.

## DOCUMENT RETENTION.

Employees must comply with Axalta's records management policies and legal hold notices. These policies apply to retention and destruction of all records created by Axalta, including hard copies, electronic files, emails, instant messages, videos, and backup tapes. For more information, see Axalta's [Record Retention Policy](#).

## SPEAKING ON AXALTA'S BEHALF AND CAREFUL COMMUNICATIONS.

Unless specifically authorized, Employees should refrain from speaking publicly on Axalta's behalf or publicly disclosing proprietary or Confidential Information about Axalta. Only Employees who have been given permission to speak publicly on Axalta's behalf are permitted to do so. Those individuals permitted to speak on Axalta's behalf must always be truthful, accurate, and respectful in their communications. For more information, see Axalta's [Public Statements and Press Release Policy](#).

## GENERATIVE ARTIFICIAL INTELLIGENCE TOOLS.

Although generative artificial intelligence tools can increase employee productivity through document drafting and text editing, these tools can also give rise to certain risks. Do not share Axalta's propriety, valuable, sensitive, or confidential information with any generative artificial intelligence tools unless you receive prior approval from the IT Security Team. Generative artificial intelligence tools may share account information, communicated information, and user content with other users and third parties without prior notice. These tools often store user content within information banks that do not distinguish between confidential and public information.

## SUBPOENAS AND GOVERNMENT INQUIRIES.

Axalta cooperates with government agencies and authorities. Forward all requests for information from any governmental agency or authority to the Legal Department immediately to ensure that Axalta may respond appropriately. All information provided must be truthful and accurate. Never mislead any investigator or governmental personnel, and never alter or destroy documents or records subject to an investigation.

### TAKE NOTE:

While generative artificial intelligence can be a valuable tool, there are risks with using such tools for work, including but not limited to:

- **Inaccurate Results:** Generative artificial intelligence tools can produce inaccurate results and, therefore, users must always verify the content.
- **Customer Data Risks:** Sharing customers' confidential information with generative artificial intelligence tools may violate contractual provisions with customers regarding the purposes for which their data can be used.
- **Privacy Risks:** Never share personal information about customers, clients, or employees with generative artificial intelligence tools unless you receive prior approval from the IT Security Team.
- **Intellectual Property Risks:** If employees use generative artificial intelligence tools to generate software code or other content, then that content may not be protectable by copyright because it was not authored by a person.





# WE MANAGE INFORMATION AND ASSETS RESPONSIBLY

## SOCIAL MEDIA.

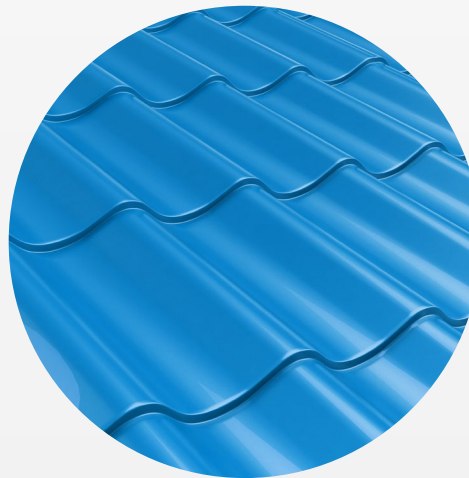
We should be thoughtful in our online communications and ensure that we follow the below guidance, as well as anything included in the Axalta [Social Media Policy](#):

- Do not disclose any Confidential Information or trade secrets;
- Do not comment on legal matters;
- If discussing the Company or Axalta products, then be transparent about your relationship with the Company and be clear that your statements are your own opinion, not those of the Company;
- Do not post anything that might be viewed as a threat, harassment, or bullying; and
- Do not post anything that may be perceived as disrespectful to our customers, clients, suppliers, partners, or competitors.

### PROTECTING CONFIDENTIAL INFORMATION

Don't forget the basics! Protect physical files with locks and protect electronic files with passwords. Transmit confidential information securely through encryption and password protection. When working remotely or traveling, always password protect portable devices and never leave documents or portable devices unattended.

# Reports, Investigations, and Potential Violations



## CONSEQUENCES FOR VIOLATING THE CODE.

Violation of any law or this Code is a serious matter. Any Employee who compromises or violates any applicable law or this Code may be subject to disciplinary action, up to, and including, termination; loss of employment-related benefits, including compensation; and, if applicable, criminal, or civil proceedings.

## COOPERATING IN INVESTIGATIONS.

You may be asked to cooperate or provide information in an investigation. Your full cooperation and assistance are required and the failure to do so will be considered a violation of this Code and Axalta policy.

## NON-RETALIATION.

We will not tolerate retaliation against any Employee who makes a good faith report about a violation or possible violation of applicable law or the Code, or who participates in any investigation conducted internally or by a government enforcement agency. If you believe you have been retaliated against, then you should promptly report it to one of the resources listed on page 32.

## WAIVERS.

Waivers or exceptions to this Code for any Employee generally will not be granted. Only under exceptional circumstances will a waiver be granted, in advance, by the Chief Compliance Officer. A waiver of this Code for any Executive Officer or member of the Board of Directors may be made only by the Board of Directors or a committee of the Board of Directors. Members of the Board of Directors are required to obtain a waiver of this Code when seeking a waiver regarding conduct to be performed pursuant to that Director's role as a member of the Board of Directors.



# REPORTS, INVESTIGATIONS, AND POTENTIAL VIOLATIONS

## TO ASK A QUESTION, RAISE A CONCERN, OR REPORT A VIOLATION.

Except where prohibited by law, any Employee who becomes aware of a violation of this Code, any Axalta policy, or the law is expected to report the violation immediately to one of the channels listed below. Any Employee who would like guidance on how to comply with this Code or applicable law is also invited to ask questions or seek guidance through any of the following channels:

- Axalta's Ethics Helpline ([www.axalta.com/helpline](http://www.axalta.com/helpline); see page 10 for more information on the Helpline)
- Your manager
- The Regional Compliance Officer
- Any member of the Axalta Legal Department
- Local Human Resources
- The Chief Compliance Officer, who can be reached at:

Axalta Coating Systems  
Attn: Chief Compliance Officer  
50 Applied Bank Boulevard, Suite 300  
Glen Mills, PA 19342



Except where prohibited by local law, Employees may make reports anonymously and Axalta will take steps to maintain the confidentiality of reports. Third parties may report potential business misconduct by contacting the Axalta Employee with whom the person has a working relationship, or by submitting their report to the Chief Compliance Officer.

Where local law allows, third parties may also report business misconduct through the Ethics Helpline, Axalta's website, or through regular mail.

## INVESTIGATING AND RESOLVING REPORTED VIOLATIONS.

Axalta has established procedures for the receipt, investigation, and resolution of whistleblower reports. All reports of possible violations of this Code or applicable laws will be evaluated promptly and investigated, where appropriate. For further information, see the Axalta [Whistleblower and Non-Retaliation Policy](#).

Employees should be aware that the Chief Compliance Officer and other members of the Legal Department, as well as other Employees that may be participating in any investigation, are obligated to act in the best interests of Axalta and do not act as personal representatives or lawyers for Employees.

# Appendix A: Our Policies and Procedures

## LEGAL AND COMPLIANCE POLICIES:

- [Anti-Corruption Policy](#)
- [Gifts & Business Entertainment Policy](#)
- [Regulation Fair Disclosure Policy](#)
- [Related Person Transaction Policy](#)
- [Whistleblower and Non-Retaliation Policy](#)
- [Insider Trading Policy](#)
- [Legal Hold Policy](#)
- [Global Trade Compliance Policy](#)
- [Antitrust and Competition Law Policy](#)
- [Antitrust and Competition Law Guidelines](#)
- [U.S. Equal Employment Opportunity and Workplace Harassment Policy](#)

## IT POLICIES:

- [Global Workstation Privilege Restriction](#)
- [Global Mobile Device Policy](#)
- [Global Data Classification Policy](#)
- [Global Data Governance Policy](#)
- [Global Granting Access to Electronic Records Policy](#)
- [Global Acceptable Use Policy](#)
- [Global Encryption Policy](#)
- [Global Account Management Policy](#)
- [Global Computer Security Incident Response Policy](#)
- [Global Network Security Policy](#)
- [Global Password Management Policy](#)

# Appendix A: Our Policies and Procedures

## SUSTAINABILITY POLICIES:

- [Supplier Code of Conduct](#)
- [Environmental, Health and Safety Policy](#)
- [Conflict Minerals Policy](#)

## RECORDS MANAGEMENT AND DATA PRIVACY POLICIES:

- [Global Privacy Statement](#)
- [Record Retention Policy](#)

## CORPORATE AFFAIRS POLICIES:

- [Public Statements and Press Release Policy](#)
- [Social Media Policy](#)
- [Corporate Giving & Contributions Policy](#)

## GLOBAL TRAVEL TEAM POLICIES:

- [Global Travel and Entertainment Policy](#)