

# ECOYST INC.

## SUPPLIER CODE OF CONDUCT



Ecovyst Inc. and Zeolyst International and their affiliates world-wide (collectively, the “Company”) are all committed to the highest standards of ethical business conduct. This Supplier Code of Conduct has been developed by the Company to convey to all of the Company’s current and future vendors, suppliers, contractors, consultants, agents and other providers of goods and services (our “Suppliers”) the standards to which Suppliers must adhere when conducting business.

This document is modeled on the Ecovyst Inc. Code of Conduct, which contains the guiding principles the Company’s directors, officers and employees are required to adhere to when dealing with each other and the Company’s customers, Suppliers, competitors and other third parties. Because we hold ourselves to high standards of business ethics, we expect and require that our Suppliers do the same.

Therefore, Suppliers should read, understand and conduct their affairs in compliance with the principles set forth in this Supplier Code of Conduct. By doing business with any member of the Company group, each of our Suppliers agrees to be bound by and to adhere to our Supplier Code of Conduct, as it may be amended from time-to-time, and which can be found at [www.ecovyst.com](http://www.ecovyst.com).

While this Supplier Code of Conduct sets forth certain minimum standards that all Suppliers must meet – such as complying with all applicable laws – Suppliers should understand that certain goals stated in this Supplier Code of Conduct should be achieved based on continuous effort and improvement.

All of the Company’s Suppliers are required to take reasonable steps to ensure that this Supplier Code of Conduct is communicated throughout their organizations and throughout their own supply chain. Any failure to comply with this Supplier Code of Conduct of which the Supplier is aware should be immediately reported to the Company. The Company reserves the right to audit each Supplier’s compliance with this Supplier Code of Conduct and/or to periodically require Suppliers to certify compliance with this Supplier Code of Conduct, and failure to adhere to the requirements set forth in this document may be grounds for terminating the Company’s relationship with the Supplier, depending on the seriousness of the violation and the particular circumstances.


The following sets forth the standards all Company Suppliers are required to meet:

### 1. Labor, Employment and Human Rights

Our Suppliers must maintain labor and employment policies and procedures that ensure workers are treated with respect and dignity, and that personnel actions such as hiring, compensation and benefits are administered consistent with all applicable laws, including applicable laws against discrimination, harassment and retaliation.

Suppliers shall ensure that all labor performed on their behalf is by persons of legal working age and that working hours (including breaks and days away from work), wages and workplace conditions are in compliance with all applicable laws. Suppliers must strive for continuous improvement in the areas of employee and process safety and environmental compliance and maintain management and other systems to protect employees from unsafe working conditions and exposure to harmful materials.

Suppliers shall not engage or permit human trafficking or use any form of slave, involuntary, bonded, indentured or prison labor. Involuntary labor includes the transportation, harboring, recruitment, transfer, receipt, or employment of persons by means of threat, force, coercion, abduction, fraud or payments to any person having control over another person for the purpose of exploitation.



Our Suppliers also must permit freedom of association and collective bargaining and prohibit discrimination, harassment, violence, threats, physical intimidation, abuse and other forms of degrading or inhumane treatment in their workplaces.

Finally, our Suppliers are expected to promote diversity and inclusion in their workplaces and to adopt and maintain appropriate policies and procedures to promote the recruitment and development of a more diverse workplace.

## **2. Gifts and Conflicts of Interest**

It is not permissible for the Company's directors, officers and employees to give, solicit or receive gifts, payments, services or other benefits that influence any business decision or that create the appearance of influencing any business decision. Suppliers may not provide a gift or other benefit that is more than nominal in value (\$100.00 USD) to any Company director, officer, employee or their close family members more than one time per calendar year. If any Company director, officer or employee solicits a gift of more than nominal value, it should be reported to the Company's Chief Compliance Officer.

Each Supplier must maintain an appropriate policy designed to prevent actual or potential conflicts of interest by its employees, officers and directors. In particular, Suppliers must ensure that no employee, officer or director has a conflict of interest in connection with the Supplier's business with the Company. Any identified conflict of interest involving the Supplier's business with the Company must be reported in detail to the Company's Chief Compliance Officer.

## **3. Confidential/Proprietary Information**

Suppliers must respect the Company's intellectual property, trade secrets and other confidential, proprietary or sensitive information, and may not use or disclose any such information except in accordance with their contract with the Company and only for the benefit of the Company. Any information or data regarding the Company's operations shall be treated by Suppliers as confidential at all times.

Suppliers must safeguard the personal and private information of their employees and others with whom they do business and must comply with all laws and regulations regarding the collection, storage and use of personally identifiable information of employees and anyone with whom they do business.

## **4. Health, Safety, Environment and Security (HSES)**


The Company is committed to operating in a responsible manner that safeguards the health and safety of its employees, customers, the community and other stakeholders and also protects the environment, in accordance with the Ecovyst Inc. HSES Policy. Suppliers are expected to comply with all applicable HSES laws, regulations and permitting requirements in the conduct of their businesses and are encouraged to abide by the standards described in the Ecovyst Inc. HSES Policy, as the same may be amended from time-to-time.

Suppliers must maintain and comply with all environmental permits required for their operations and also maintain and continuously improve an environmental management system that is appropriate for the Suppliers' businesses. Suppliers also must maintain and continuously improve response plans and systems to address environmental impacts from the Supplier's business, such as releases into the environment or other environmental incidents.

Suppliers must assess the environmental impact of their businesses in the communities in which they operate and strive to reduce reliance on water and energy in their processes. Suppliers also should review and strive to reduce their emissions of greenhouse gases and hazardous and other process wastes.

## **5. Finance and Accounting Integrity**

All financial transactions with the Company must be accurately recorded and maintained using standard accounting practices, such as GAAP and IFRS, and must be available for inspection on the Company's reasonable request.



The Supplier must maintain an adequate and appropriate system to detect and prevent money laundering and improper, corrupt or fraudulent transactions and notify the Company's Chief Compliance Officer if any such transactions involving the Company are detected.

## **6. Compliance with Trade Laws and Regulations**

Suppliers must adhere to all applicable trade and import/export laws and regulations that apply to their activities, including those issued by the United Nations, the European Union, the U.S. government and individual countries where Suppliers will be importing or exporting goods or materials. Suppliers must not participate in international boycotts that are prohibited by the U.S. government, but Suppliers must adhere to all trade sanctions imposed by the U.S. Government, including, but not limited to, sanctions imposed on countries, entities and individuals.

Suppliers must maintain chain of custody documents showing the origin and place of production of incoming materials and that such materials were obtained consistent with applicable law. If applicable, Suppliers shall exercise due diligence, which may include compliance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, on their entire supply chains with respect to the sourcing of all gold, columbite-tantalite (coltan), cassiterite, wolframite, and their derivatives (including tin, tantalum, tungsten) contained in their products, determine whether those metals are from the Democratic Republic of the Congo ("DRC") or any adjoining country and, if so, determine whether those metals directly or indirectly financed or benefited armed groups that are perpetrators of serious human rights abuses in the DRC or an adjoining country.

## **7. Bribery and Corruption**

Suppliers must conduct business in a way which will assure compliance with the Foreign Corrupt Practices Act (U.S.) and the Bribery Act 2010 (U.K.), and all other applicable bribery and anti-corruption laws. Suppliers shall not offer or promise payments or gifts of anything of value, directly or indirectly, to any private person, official, candidate for political office, or their relatives, or any political party and its agents or affiliates, which are intended to obtain new business, retain existing business, or obtain any improper advantage. Suppliers also must maintain and produce to the Company on its request accurate financial records relating to their business with the Company.

## **8. Competition Laws**

The Company supports competition based on high quality, responsive service and competitive price. Suppliers must conduct their business in full compliance with all applicable laws intended to promote free and fair competition. Supplier shall not engage in conduct that seeks to restrict competition, such as price fixing, market allocation, boycotts, coordination with competitors and other forms of conduct that is prohibited by applicable competition laws.

## **9. Whistleblower Procedures**

Our Suppliers must maintain an adequate procedure by which employees, sub-suppliers and other stakeholders may raise concerns or complaints. This type of system may take many forms and could be satisfied by maintaining a whistleblower hotline. The Supplier's process for collecting and resolving concerns or complaints should guarantee the confidentiality of complaints, result in the full investigation of any issues that are raised and, where appropriate, implement corrective action to resolve the concern.