

ETHICS & COMPLIANCE

COMPLAINT AND REVIEW PROCESS



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

Employees are encouraged to alert their supervisor, Human Resources or the Chief Compliance Officer regarding any concerns regarding noncompliance within the Company. It is Ecovyst policy that each such concern is treated seriously, resolved quickly and that the person who raises such concern be protected from retaliation. If an employee is uncomfortable raising a concern regarding non-compliance directly, he or she may utilize the Company's 24-hour confidential Ecovyst EthicsPoint Concern Line which also fulfills the function of any whistleblower reports that may be filed.

In each instance where noncompliance is suspected or reported, a thorough and impartial investigation is conducted using either internal or external resources. Investigative resources may include personnel from our internal audit, human resources or legal departments and/or outside legal counsel or other experts. Depending on the nature of the noncompliance allegation, the investigation may include, but not be limited to, interviews with personnel, examination of documents and/or facilities and consultations with experts.

At the conclusion of each investigation, the Chief Compliance Officer reviews the results of the inquiry and appropriate corrective actions are implemented based on the results of each review.