

#### **ALKEGEN'S SUPPLIER CODE OF CONDUCT**

## Overview

Unifrax Holding Co., including its global subsidiaries (collectively, "Alkegen"), is committed to the highest standards of ethics and business conduct. As stated in our Code of Conduct, Alkegen employees must comply with the law, act in good faith, uphold Alkegen's values, communicate openly and effectively, seek to advance the interests of stakeholders, and hold themselves accountable. This Supplier Code of Conduct (the "Supplier Code") sets forth our expectations for each of our product and service suppliers, which are aligned with those we maintain for our own directors, officers, employees, and representatives. This Supplier Code is not intended to be an exhaustive list of all ethical and business conduct requirements to be followed by suppliers. As our supplier, it is your responsibility to ensure that your directors, officers, employees, representatives, and business partners understand and comply with the expectations set forth in this Supplier Code.

# **Compliance with Laws**

At a minimum, you must maintain full compliance with all laws and regulations applicable to the operation of your business and your relationship with Alkegen. This obligation includes, as applicable, (a) strict compliance with all laws and regulations governing the export of goods, economic sanctions and embargoes, and (b) special rules that apply to government contracts.

# **Environmental Health & Safety**

You must comply with all applicable environmental, health and safety laws, regulations and directives and conduct your operations in a manner that safeguards the environment, including operating in a manner that minimizes waste, emissions, energy consumption (including greenhouse gases), and the use of materials of concern. Ensuring safe and healthy work environments for your employees and visitors is also paramount.

## **Competition and Fair Dealings**

You must compete strictly based on the merits of your products and services. You must not pay a bribe in any amount, to anyone, anywhere, for any reason whatsoever, whether on your behalf or on behalf of others. Accordingly, you must never offer, promise, authorize or provide, directly or indirectly, anything of value (including business gifts or courtesies) with the intent or effect of inducing anyone (including a Alkegen customer, Alkegen employee, or higher tier or sub-tier supplier) to forego their duties and provide unfair business advantage to Alkegen, you, or others. These restrictions include facilitating payments, which are payments to expedite or secure performance of a routine governmental action (e.g., obtaining a visa or customs clearance).

Engaging in any form of anti-competitive conduct or other deceptive/unfair market practices, whether on your behalf or on behalf of others, is strictly prohibited. Accordingly, you must never rig bids, fix prices, or allocate customers or markets, or exchange Alkegen's or your competitively sensitive information (e.g., price, cost, output, etc.) with Alkegen's competitors.

**ALKEGEN** 

#### **Conflict of Interest**

You must avoid all conflicts of interest or situations giving the appearance of a conflict of interest in your dealings with Alkegen. You must report to Alkegen any instances involving actual or apparent conflicts of interest between your interests and those of Alkegen.

#### **Protection of Information**

You must respect the legitimate proprietary rights and intellectual property rights of Alkegen and others. Proper care must be taken to protect sensitive information, including confidential, proprietary, and personal information. You should not use such information for any purpose other than the business purpose for which it was provided unless the owner of the information provided prior authorization.

## **Non-Discrimination**

You must treat your employees and business partners fairly, based only on merit and other factors related to your legitimate business interests, and without regard to race, religion, color, age, gender, gender identity or expression, sexual orientation, national origin, marital status, veteran status or disability.

# **Child Labor and Human Trafficking**

You must ensure that child labor is not used in the performance of your work, whether or not related to Alkegen business. The term "child" refers to any person under the minimum legal age for employment where the work is performed. You must comply with laws and regulations prohibiting human trafficking (including engaging the use of forced/indentured/bonded labor).

**General Disclaimer:** The expectations set forth in this Supplier Code are not intended to conflict with or modify the terms and conditions of your contract(s) with Alkegen. If any provision in this Supplier Code conflicts with any clause in your contract with Alkegen, the terms of the contract shall govern.

For questions or concerns about this Supplier Code, including its application to specific circumstances in connection with your organization's performance of work for Alkegen, or suspected failures by your organization to satisfy these expectations in performing work for Alkegen, please contact us at:

Alkegen
One Colonial Road
Manchester, CT 06042 (USA)
Attn: Legal Department

- OR -

info@Alkegen.com