



**BAKELITE**  
SYNTHETICS

# Bakelite Synthetics **Code of Conduct for Suppliers and Other Third Parties**

# Table of Contents

Ethics and Compliance with Laws	4
Human Rights and Labor	5
Environment, Health and Safety	5
Intellectual Property and Information Protection	6
Trade Controls and Customs Compliance	6
Ways To Report Concerns	7
Bakelite Synthetics: Helping you make it in today's world.	8





Bakelite UK Holding Ltd and any of its subsidiaries anywhere in the world (“Bakelite Synthetics”) values its reputation for integrity. We strive at all levels of the company to adhere to the highest ethical standards in the conduct of our business and to comply with all applicable laws and regulations. We are judged not only by the business results we achieve but also by how we achieve them. We believe that organizations that operate ethically and with integrity build value over time and have the best chance for long-term success.

This Code of Conduct (the “Code”) applies to all Suppliers and other Third Parties that do business with Bakelite Synthetics. A “Supplier” is any business, company, organization, entity or person that: (i) sells or seeks to sell any kind of goods or services to Bakelite Synthetics, or (ii) performs or seeks to perform services for or on behalf of Bakelite Synthetics. A Supplier may be considered a Third Party for purposes of this Code, and will be referred to as such from this point forward. Other Third Parties include but are not limited to those who act as agents, (sales) representatives, distributors or resellers for Bakelite Synthetics.

All Third Parties will comply with this Code in all aspects of their dealings with, for or on behalf of Bakelite Synthetics. To that end, Bakelite Synthetics expects Third Parties to implement effective systems and controls that will promote compliance with applicable laws and foster a culture that values ethics and integrity in business dealings. Bakelite Synthetics also expects Third Parties to report any suspected violations of the Code using the contact information provided. Bakelite Synthetics reserves the right to assess and monitor a Third Party’s compliance with this Code and to take appropriate actions in the event of noncompliance.

# Ethics and Compliance with Laws

Bakelite Synthetics expects its Third Parties to conduct business in accordance with the highest ethical standards and expects all employees of Third Parties to be sensitive to ethical considerations and the consequences of their actions.

## Business Integrity

Any and all forms of corruption, extortion and embezzlement are strictly prohibited. Third Parties shall not take unfair advantage of Bakelite Synthetics through abuse of privileged or proprietary information, misrepresentation of material facts or any other unfair or dishonest practices.

## Fair Competition

Third Parties shall not engage in any misappropriation of confidential information, price fixing, bid rigging or collusive conduct in connection with any transaction involving Bakelite Synthetics. Third Parties are expected to understand and comply with all applicable laws regarding fair competition and antitrust.

## Gifts/Entertainment

Third Parties shall not offer any Bakelite Synthetics employee or an employee's family members gifts, kickbacks, bribes, payments, fees, services, discounts or other privileges in order to obtain favorable treatment from Bakelite Synthetics. Businessrelated meals and entertainment that are reasonable under the circumstances and token gifts or favors of nominal value which do not create a real or apparent sense of obligation are permitted, but only if consistent with local law and no government officials are involved.

## Conflicts of Interest

Third Parties shall not enter into a financial or any other relationship with a Bakelite employee that creates any actual, potential or apparent conflict of interest with Bakelite. Bakelite Synthetics employees may not serve as officers, directors, employees, agents or consultants of Third Parties, except with the consent of appropriate Bakelite Synthetics leadership. All conflicts discovered by Third Parties must be disclosed and corrected.

## No Bribery

Third Parties shall not offer or provide anything of value, including money, bribes, entertainment or kickbacks, to any government official in connection with any transaction involving Bakelite Synthetics. Third Parties are expected to have adequate procedures in place to prevent their employees from engaging in bribery, including training employees on the requirements of the U.S. Foreign Corrupt Practices Act and the UK Bribery Act.

## Prevention of Internal Corruption

Bakelite Synthetics employees are prohibited from demanding from Third Parties anything of value, such as gifts, payments or other benefits. Third Parties are expected to report violations of this policy to Bakelite Synthetics.

## Accurate Records

Third Parties shall maintain accurate and adequate records pertaining to any transactions involving Bakelite Synthetics, and to provide Bakelite Synthetics access to such records upon request.



# Human Rights and Labor

Bakelite Synthetics values the diversity of employees and expects its Third Parties to act similarly by maintaining policies that encourage workplace respect and that seek to hire and retain the best employees at all levels of the company without regard to race, color, religion, sex, sexual orientation, national origin, age, disability or veteran status.

## Labor

Third Parties are not to engage in forced, bonded or indentured labor or involuntary prison labor. All work will be voluntary. There is to be no inhumane treatment, discrimination or ha-

arrassment, including any sexual harassment, sexual abuse, mental or physical coercion or verbal abuse of workers, nor is there to be the threat of any such treatment. Child labor is prohibited. All persons performing work for Third Parties must meet minimum age limits established by applicable laws and regulations. Work times are not to exceed the maximum set by applicable laws and regulations.

## Conflict Minerals

Third parties shall comply with applicable conflict minerals laws, and shall have policies and programs to reasonably ensure that their activities and/or the activities of their suppliers do not benefit perpetrators of human rights abuses in the Democratic Republic of the Congo or in adjoining countries.

# Environment, Health and Safety

Bakelite Synthetics expects that Third Parties will comply with all applicable environmental laws and regulations. Bakelite Synthetics also expects that Third Parties will provide a workplace environment that is safe, secure and compliant with all applicable health and safety standards.



## Intellectual Property and Information Protection

Third Parties shall not misappropriate or misuse the intellectual property and confidential information of Bakelite Synthetics. Third Parties may use such property and information only upon obtaining authorization from Bakelite Synthetics and only for the limited purpose authorized. Third Parties in possession of Bakelite's Synthetics intellectual property or confidential information must take appropriate actions to safeguard against the unauthorized disclosure or misuse of such property and information.

## Trade Controls and Customs Compliance

Third Parties shall comply with all applicable trade control laws and regulations in the import, export, or transfer of Bakelite Synthetics products.



# Ways To Report Concerns

Subject to applicable local laws and regulations, Third Parties are expected to promptly notify Bakelite Synthetics of any compliance or integrity matters involving or affecting Bakelite Synthetics. The duty to report applies regardless of whether the concern involves the Third Party. In addition to reporting concerns, a Third Party is expected to cooperate with and assist Bakelite Synthetics as it investigates the matter.

A concern may be reported by using the Bakelite Synthetics Hotline.

The Bakelite Synthetics Hotline is a multilingual resource that may be used in all countries where Bakelite Synthetics operates. It is available to receive reports 24 hours a day, 7 days a week and 365 days a year. The Bakelite Synthetics Hotline is operated by a neutral, third-party provider that does not utilize caller ID. Anonymous reporting is permitted.

For U.S.: 1 844-771-1625 or report online at [bakelite.ethicspoint.com](http://bakelite.ethicspoint.com). For all other locations: go to [bakelite.ethicspoint.com](http://bakelite.ethicspoint.com) and select Report a Concern. Select the Country you are reporting from. You will have the option of reporting online or by phone.



# Bakelite Synthetics: Helping you make it in today's world.

Our global team produces the best products and provides the technical expertise to customize them to your exact needs. The result? Specific solutions, not generic products, leading to thousands of breakthroughs that improve bottom lines and enhance lives.







# Next Generation Synthetics



Learn more about the vision, products and history of bakelite on our website

[bakelite.com](https://bakelite.com)

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