SUPPLIER CODE OF CONDUCT

PURPOSE AND SCOPE

As a member of the Chemistry Industry Association of Canada (CIAC) and the American Chemistry Council (ACC), Chemtrade Logistics Inc., and all its affiliates (collectively or individually, as applicable, "**Chemtrade**") do more than just comply with regulations. Chemtrade actively adheres to the CIAC's Responsible Care® ethic and its codes of practice and principles. Chemtrade uses the RC14001 management system, which combines Responsible Care® and ISO14001, to manage and continually improve our environmental performance, the safety of our employees, and our contribution to the community. This supplier code of conduct ("**SCOC**") outlines the principles and expectations that suppliers and service providers, including their employees and representatives ("**Suppliers**"), must comply with when conducting business with, or providing goods and services to, or acting on behalf of, Chemtrade.

Suppliers include manufacturers or suppliers of raw materials, chemicals, packaging and equipment, as well as suppliers of information and services such as construction, delivery, consulting, design and other professional services. Suppliers must take reasonable measures to ensure that their suppliers and subcontractors act in accordance with this SCOC.

ETHICS AND LEGAL REQUIREMENTS

Ethics And Integrity. Suppliers will conduct their business in a legal and ethical manner and act with integrity.

Compliance with Laws. In all their activities, Suppliers shall ensure they conduct business in compliance with the applicable laws, rules, and regulations of the jurisdiction(s) in which they operate.

Conflicts of Interest. Suppliers shall exercise reasonable care and diligence to prevent any situation in which a conflict of interest may occur in its dealings with Chemtrade. A conflict of interest exists when the personal or private activities, interests, investments, positions, situations or relationships of a Supplier interfere, or appear to interfere, with its ability to act in the best interests of Chemtrade. For example, Suppliers should not employ or make payments to any employee or representatives of Chemtrade during the course of any transaction between the Supplier and Chemtrade, and should take care that any

personal relationship is not used to influence a Chemtrade employee's business judgment in respect of dealings between the Supplier and Chemtrade.

Gifts, Hospitality and other Benefits. The nature of any gifts, hospitality or other benefits must not, by their quality, quantity, or timing, be used by Suppliers to gain improper advantage or preferential treatment from Chemtrade employees or its representatives. Suppliers shall also avoid giving or receiving gifts, hospitality, or other benefits that could give the appearance of impropriety. Gifts or hospitality offered to Chemtrade, or its representatives must only reflect normal expressions of courtesy and must not risk compromising Chemtrade integrity or reputation or calling into question Chemtrade objectivity or impartiality. Suppliers are to comply with these rules and expectations, and maintain appropriate records of exchanges of gifts, hospitality, and other benefits.

Anti-Bribery and Anti-Corruption. Suppliers shall comply with applicable laws related to anti-bribery and anti-corruption in the jurisdiction(s) in which they operate. Suppliers shall not engage directly or indirectly in any activities that would put Chemtrade at risk of violating anti-bribery and anti-corruption laws. Suppliers shall notify Chemtrade if they become the subject of an investigation with respect to allegations of impropriety involving bribery or corruption.

Competition and Anti-Trust. Suppliers will comply with the applicable laws, rules, and regulations of the jurisdiction(s) in which they operate regarding competition and antitrust laws.

Sanctions. Suppliers will not engage in conduct that violates, or causes Chemtrade to violate, applicable sanctions laws, including, but not limited to, procuring or sourcing, directly or indirectly, any products or materials provided to Chemtrade from countries that are subject to sanctions laws or dealing with prohibited persons in the jurisdiction(s) in which Chemtrade operates.

Confidentiality and Business Information. Suppliers shall protect any and all financial, business, technical or other information of Chemtrade, its customers or employees that is provided to Supplier, in whatever form or medium, in accordance with their contractual obligations to Chemtrade, applicable law in the jurisdiction(s) in which the Supplier operates, and best reasonable commercial practices. Information shall be collected, used, and disclosed strictly for the purposes agreed and protected through all stages of the information lifecycle. Suppliers must notify Chemtrade immediately of any actual or suspected breaches of information and security breaches (physical and cyber) and assist Chemtrade in managing any consequences arising from such events.

Chemtrade Policies. In addition to this SCOC, Supplier acknowledges and certifies that it has reviewed the Chemtrade Code of Conduct (the "**Code of Conduct**") available at: www.chemtradelogistics.com/sustainability/#policy-documents and that Chemtrade employees are required to follow the Code of Conduct. Without limiting the foregoing, Supplier also agrees it will support the Code of Conduct and will not directly or indirectly take any action that may cause a Chemtrade employee to violate any law or the Code of Conduct.

ENVIRONMENTAL, HEALTH AND SAFETY MANAGEMENT

Environment. Chemtrade is committed to doing business in an environmentally responsible manner. Suppliers should seek to conduct their business in an environmentally responsible way in compliance with applicable laws in the jurisdiction(s) in which they operate. Ideally, Suppliers will adhere to Responsible Care® guidelines, and quality standards in accordance with ISO 9001 standards. Suppliers must have the appropriate management procedures in place to comply with all environmental laws and, where appropriate, support Chemtrade's efforts to reduce its environmental impacts.

Sustainability. Chemtrade encourages Suppliers to collaborate with us to eliminate waste and cost from our supply chain. Suppliers will strive to reduce emissions and waste, and use energy and natural resources efficiently. Suppliers will work with their employees, customers, contractors and commercial partners to promote responsible management of their products and processes through their entire life cycle and for their intended end use.

Health and Safety. Suppliers will provide a safe and healthy workplace for their employees, including appropriate controls, training, work procedures, and personal protective equipment. Suppliers will give health, safety and security a priority consideration in manufacturing their products and planning for new products, facilities and processes.

HUMAN RIGHTS AND LABOUR

Discrimination. Suppliers shall maintain workplaces characterized by professionalism, and respect for the dignity of their own employees and every individual with whom their employees interact, including respect for differences such as gender, gender identity, gender expression, race, colour, age, disability, sexual orientation, ethnic origin, and

religion. Suppliers shall not tolerate harassment, discrimination, violence, retaliation or other disrespectful or inappropriate behaviour.

Employment Standards. Suppliers must abide by applicable employment standards, labour, health and safety, nondiscrimination, and human rights legislation in the jurisdiction(s) where they operate. Even where applicable laws in the jurisdiction(s) in which the Supplier operates do not prohibit discrimination, harassment, child, forced or compulsory labour, or contain generally acceptable employment standards, labour, or health and safety protections, Suppliers shall be able to demonstrate, in their workplaces and the workplaces of their suppliers or subcontractors, that:

- Child, forced, or compulsory labour is not used;
- Discrimination and harassment are prohibited;
- Processes are in place that enable employees to raise concerns and speak up without fear of reprisal;
- Appropriate and reasonable background screenings, including investigations for prior criminal activity, have been conducted to ensure the integrity and good character of their employees;
- Clear and uniformly applied employment standards are established, that meet or exceed legal and regulatory requirements;
- There is a prohibition on corporal punishment, violence or threats of violence; and
- A healthy and safe workplace is provided that complies with relevant health and safety laws and workers' hours will not exceed the maximum number set by applicable law.

Labour and Free Association. In accordance with local laws, Suppliers will respect the rights of their employees to associate freely, join labor unions, seek representation and engage in collective bargaining.

Safety on Chemtrade sites. When performing any work at Chemtrade offices, or in the field, or on location at a Chemtrade site, Suppliers must adhere to all Chemtrade Environmental, Health and Safety policies, procedures, life critical rules, emergency protocols, complete both Chemtrade corporate and site specific training, report **ALL** complaints, injuries, incidents and near misses to Chemtrade promptly, and work with Chemtrade to meet responsibilities for a healthy and safe workplace.

MONITORING, COMPLIANCE AND REPORTING.

Compliance. Suppliers shall maintain all information and management systems necessary to document their compliance with this SCOC, applicable laws in the jurisdiction(s) in which they operate, and their contractual obligations with Chemtrade, and provide evidence to Chemtrade upon request. It is the responsibility of each Supplier to ensure that its employees, representatives, and subcontractors understand and comply with this SCOC.

Monitoring. Chemtrade reserves the right to monitor a Supplier's compliance to the SCOC and audit their control environment. Chemtrade will be entitled to request information from the Supplier as to their compliance with the obligations and principles of the SCOC.

Reporting Noncompliance. Any person with reason to believe that the obligations or principles of the SCOC are not being respected by a Chemtrade Supplier is asked to report to the Corporate Procurement team or to Chemtrade's anonymous compliance line or website, which is operated by a third-party company.

Chemtrade Compliance Line

CALL:

North America – 1-888-475-8376

Brazil – 0800-8911668

ONLINE: www.chemtradelogistics.ethicspoint.com .

You may also report your concerns via e-mail directly to the Chair of the Audit Committee of Chemtrade at audit@chemtradelogistics.com

Corrective Action. In the case of any deficiencies identified with respect to compliance with the SCOC, Suppliers shall promptly take corrective action to address identified deficiencies. Failure to comply with the SCOC may result in termination of a Supplier's relationship with Chemtrade.

Issued and Revision Date:
Issued December 2023. Last Revision Date: December 2023

This SCOC is supplemental to any contract between Chemtrade and Supplier. To the extent that more specific or stringent terms are agreed in a contract, the contract terms shall control. This SCOC does not create any third-party beneficiary rights for the Supplier or any other third parties.

Last Reviewed - August 12, 2026

RESPONSIBLE CARE®
OUR COMMITMENT TO SUSTAINABILITY