



Supplier Code of Conduct

PQ 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 PQ Corporation 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. 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.pqcorp.com.

Labor and Employment Policies

Suppliers must adhere to labor and employment policies that ensure that 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 and workplace conditions are in compliance with all applicable laws. Suppliers shall not traffic persons 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.

Gifts

Suppliers should be aware that 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.

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 unless that information enters the public domain through no fault of the Supplier.

Health, Safety, Environment (“HSE”)

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 PQ HSE Mission Statement and Guiding Principles. Suppliers are expected to comply with all applicable HSE laws, regulations and permitting requirements in the conduct of their businesses and are encouraged to abide by the standards described in the PQ HSE Mission Statement and Guiding Principles, as the same may be amended from time-to-time.

Finance and Accounting Integrity

All financial transactions with the Company should 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.

Compliance with Laws and Trade 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.

Sourcing Materials. 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.

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.

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 Code of Conduct Compliance

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. Failure to adhere to this Supplier Code of Conduct may be grounds for terminating the Company's relationship with the Supplier, depending on the seriousness of the violation and the particular circumstances. If you have any questions about this Supplier Code of Conduct, you may contact our CEO, Al Beninati, at 610-651-4349 or al.beninati@pqcorp.com