

# Employee Code of Conduct Policy

## Purpose

This policy affirms Nexam Chemical Groups (NEXAMs) belief in responsible social and ethical behaviour from all employees. NEXAM expects its employees to maintain a high standard of conduct and work performance to make sure the business maintains its excellent reputation with customers. Good personal conduct contributes to a good work environment for all.

## Principles

Our employees contribute to the success of our organisation and that of our customers. NEXAM fully endorses that all employees are not deprived of their basic human rights.

Furthermore, our employees have an obligation to the business, our customers and themselves to observe high standards of integrity and fair dealing. Unlawful and unethical practices undermine employee and customer trust.

## Scope

The code applies to all employees of NEXAM and associated entities, whenever you are identified as a representative of NEXAM. In some circumstances, this will include times when you are outside your immediate workplace or working hours, for example at work functions, out of hours work activities or when you are in the community on behalf of NEXAM.

## Policy

Our code of conduct policy provides the framework of principles for conducting business, dealing with other employers, customers and suppliers. The code of conduct does not replace legislation, and if any part of it is in conflict, then legislation takes precedence. This policy is based on the following.

- Act and maintain a high standard of integrity and professionalism
- Act in NEXAMs best interest and value the company's reputation
- Be responsible and scrupulous in the proper use of Company information, funds, equipment and facilities

- Be considerate and respectful of the environment and others
- Exercise fairness, equality, courtesy, consideration and sensitivity in dealing with other employees, customers and suppliers
- Maintain a safe workplace and do not conduct yourself in a way that might risk the health and safety of yourself or others
- In the event of any unsafe conditions or unsafe acts, these are to be reported to your line manager and remedial actions put in place
- Avoid apparent conflict of interests, promptly disclosing to a NEXAM senior manager, an interest which may constitute a conflict of interest
- Perform duties with skill, honesty, care and diligence
- Abide by policies, procedures and lawful directions that relate to your employment with NEXAM
- Immediately notify your managers if you are aware of a breach of law or NEXAM policy and procedure
- Any employee who in good faith, raises a complaint or discloses an alleged breach of the Code, whilst following correct reporting procedures, will not be disadvantaged or prejudiced. All reports will be dealt with in a timely and confidential manner.

## **Compliance**

NEXAM expects co-operation from all employees in conducting themselves in a professional, ethical and socially acceptable manner of the highest standards. Failure to comply with the principles or the spirit of the code or the policy framework will be considered a serious breach of NEXAM policy and will be investigated. Breaches of the code or policy framework will result in disciplinary action, ranging from a verbal warning through to the termination of your employment for serious breaches.

While the code provides general guidance and minimum expectations regarding your conduct, no code or policy can ever cover every conceivable circumstance you may face. In everything you do, you are expected to listen to and act upon your conscience and help build and maintain NEXAM and your reputation.