



## Code of Conduct and Ethics

*Updated 12.31.23*

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### MESSAGE FROM OUR PRESIDENT & CEO

Dear Colleagues:

We should all be proud of the reputation we have built together at Michelman. Through our Michelman values, we are recognized as an industry leader. We are an ethical and responsible Company through a never-ending focus on our high standards of conduct in our business dealings with customers, suppliers, business partners, in our communities, and with one another. As we continue to grow, our business and relationships will become more complex, thereby increasing our need to stay focused on our commitment to integrity.

Our Code of Conduct and Ethics establishes a foundation in achieving this effort. It was designed to provide a roadmap for each of us, to ensure that we are consistent in our dealings and focused in acting with integrity. Our Code can help each of us navigate daily and complex issues that relate to legal compliance and business ethics, by outlining our responsibilities, both individually and as a Company. However, if you have something you want to discuss, do not hesitate to speak with your manager, Human Resources Business Partner our Chief Financial and Risk Officer, or a member of the Executive Leadership Team. Throughout this document, you will also be referred to Michelman's Ethics Hotline to raise concerns you believe need to be addressed.

It is up to all of us at Michelman to live by the principles outlined in our Code. I am confident that, together, we can continue to enhance our standing in our industry and the communities that we serve.

Sincerely,

Richard I. Michelman  
President & CEO

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## ACTING WITH INTEGRITY AROUND THE WORLD

### OVERVIEW

This Code of Conduct and Ethics is designed, to provide each of us with guidance, to ensure consistent business dealings which reflect our high standards. It describes the basic principles we are all expected to follow in our responsibilities to each other, ourselves, our customers, suppliers, and business partners.

### MICHELMAN VALUES

We conduct ourselves with humility and confidence by demonstrating our organizational values and their associated behaviors.

- *Integrity* - We do what we say we will do and have the courage to do what's right. We interact with others honestly.
- *Respect* - We place health and safety first. We protect the environment. We value each person's time and contribution.
- *Success* - We meet our goals with urgency and pace. We take smart risks and invest in the future. We celebrate wins and learn from failures.
- *Collaboration* - We are aligned and act in concert, assembling the right team at the right time. We respect and value alternative points of view.
- *Curiosity* - We constantly pursue knowledge, challenge assumptions, and seek a better understanding of our connections to the world.
- *Giving* - We give our time, talents and treasures to our communities. We coach, teach, mentor, and empower others.

### HOW WE CONDUCT OUR BUSINESS

#### *WHAT IT MEANS*

Michelman has the privilege of doing business in many countries around the world. In every location, we have the responsibility to know and follow laws and regulations that apply to our business.

#### *WHY IT MATTERS*

While compliance with laws and regulations is mandatory, it also illustrates our commitment to being a responsible corporate citizen. It demonstrates we care about and respect the people where we live, work, and operate our business. Non-compliance with laws and regulations can result in civil and criminal fines and penalties, imprisonment, and other commercial or personal disciplinary actions.

#### *HOW WE DO IT*

Michelman has policies, procedures, and required training that help associates comply with laws and regulations. Any conflict between local laws and regulations, and the Code of Conduct and Ethics, should be reported to your manager, Human Resources Business Partner, our Chief Financial and Risk Officer or the Michelman Ethics Hotline.

## COMPLYING WITH THE LAW

You should never take any action on behalf of Michelman that you know, or should know, may be in violation of the law, a regulation, or our Code, even if you were directed by a manager of the Company. Managers have a heightened duty to foster a culture of compliance with our Code by acting with integrity. Because of this, Michelman authorizes no one to direct you to commit an act in violation of any applicable law or regulation. If you have any doubts about the lawfulness or appropriateness of a proposed action, seek advice from your manager, Human Resources Business Partner or our Chief Financial and Risk Officer.

Because Michelman is incorporated in the United States, our associates around the world often are subject to laws of the United States. Other countries also may apply their laws outside their borders to Michelman operations and personnel. If you are uncertain what laws apply to you, or if you believe there may be a conflict between different applicable laws, consult your Human Resources Business Partner, our Chief Financial and Risk Officer or report the issue to our Michelman Ethics Hotline before proceeding.

### WHAT SHOULD I DO?

Q - What if there is a conflict from what is in the Code of Business Conduct and the laws in the country where I work. What should I do?

A - The best approach is to follow the stricter requirement, and if that is not clear and you run across this, contact our Chief Financial and Risk Officer, your Human Resources Business Partner or report the issue to our Michelman Ethics Hotline at [integritycounts.ca/org/michelman](https://integritycounts.ca/org/michelman), or via email to [Michelman@integritycounts.ca](mailto:Michelman@integritycounts.ca) before proceeding.

## WHAT IS EXPECTED OF EVERY ASSOCIATE

### COMPLY WITH THE CODE AND THE LAW

- Understand the Code.
- Comply with the Code and the laws wherever you are.
- Use good judgment and avoid even the appearance of improper behavior.

### CONSIDER YOUR ACTIONS AND ASK FOR GUIDANCE

- Is it consistent with the Code?
- Is it ethical?
- Is it legal?
- Does it reflect Michelman's values?
- Will it reflect well on me and Michelman?
- Would I want to read about it online?

If the answer is "no" to any of these questions, don't do it. If you are still uncertain, ask for guidance. The Code tries to capture many of the situations that associates will encounter but cannot address every circumstance. You can seek help from a member of the Executive Leadership Team, your manager, Human Resources Business Partner, our Chief Financial and Risk Officer or reach out to the Michelman Ethics Hotline.

## WHAT IS EXPECTED OF MANAGERS?

### *PROMOTE A CULTURE OF ETHICS AND COMPLIANCE*

If you manage other associates, you have an important responsibility to set an example and act in a manner consistent with our Code of Conduct and Ethics. As a manager, you should:

- Act as a role model, demonstrating ethical behavior in the performance of your duties.
- Make objective business-based decisions.
- Ensure associates understand the Code and the related policies that govern their business activities.
- Create an environment where associates are comfortable speaking up without fear of retaliation.
- Listen to and understand any concern raised by an associate that compromises the Code and our values.
- Take corrective and preventive action when someone violates the Code.
- Fully support any investigation.
- Recognize and reward ethical behavior.
- Never encourage or direct associates to achieve business results at the expense of ethical or legal conduct.
- Act to stop violations of the Code or the law by those you manage.

### WHAT SHOULD I DO?

Q - What if I am facing a situation that is not covered in our Code of Business Conduct?

A - Our Code of Business Conduct can't address all of the issues that may arise at work. If you are ever unsure of the right course of action, check our policies. If the answer is unclear, it is always appropriate in any situation, to ask for help. Contact your manager, Human Resources Business Partner, our Chief Financial and Risk Officer or reach out to the Michelman Ethics Hotline.

## IMPLEMENTATION OF THE CODE

Michelman's Code of Conduct and Ethics will demonstrate to you how we use our culture and values to build and preserve trust with our customers, suppliers, vendors, business partners, governments, shareholders, and each other, so we can achieve more together.

## RESOLVING QUESTIONS ABOUT THE CODE

We are all expected to know and understand our Code. If you have any questions concerning the interpretation and application of the Code, or uncertain whether conduct may qualify as a violation, direct your questions to your manager, Human Resources Business Partner, our Chief Financial and Risk Officer or reach out to the Michelman Ethics Hotline.

## REPORTING OBLIGATIONS AND PROCEDURES

### *IGNORANCE IS NOT AN EXCUSE*

You should never ignore or cut off the flow of information regarding business transactions or potential Code violations because ignorance is not an excuse if relevant information could have been learned. We must all ensure that the appropriate Michelman representative(s) evaluate our business practices and transactions. As such, you should not take actions which could serve to limit Michelman's knowledge or understanding of transactional risks in the normal course of business.

### *DO NOT COVER-UP IMPROPER PRACTICES*

Michelman strongly opposes any cover-up of improper practices. It is always better for you to report a possible violation that may be an ongoing problem than to knowingly allow it to continue. Allowing it to continue exposes you and Michelman to possible investigation, discovery, and even criminal proceedings and fines. This could permanently affect you, and could impact Michelman's ability to do business in our communities.

### *DUTY TO REPORT*

If you know or suspect that any violation described in our Code, or any other policy, is occurring, has occurred, or may occur, you are under a duty to report the circumstances surrounding the violation immediately.

It is essential that we all keep an eye out for possible Code or other policy violations, regardless of where they may occur and whether they occur because of oversight or intention. Prompt reporting of any compliance problem is critical and cannot be overemphasized. The sooner you report, the better positioned we will be to resolve problems and develop a response. Regardless of how long the problem has been going on, you should report it immediately.

### *HOW TO REPORT*

Several avenues are available for reporting a violation of our Code or policies:

- Michelman Ethics Hotline
- Your Human Resources Business Partner
- A member of the Executive Leadership Team
- Anonymously by sending a letter, directly to Michelman's Chief Financial and Risk Officer, at:

Michelman  
Attn: Chief Financial & Risk Officer  
9080 Shell Road  
Cincinnati, OH 45236  
United States of America

### *INVESTIGATIONS*

Michelman takes all reports of possible misconduct seriously. We will investigate the matter, make a determination, and take appropriate corrective action, if any. If you become involved in a Code investigation, cooperate fully and answer all questions completely and honestly. We will strive to keep all investigations confidential, to the extent possible.

### *MAKING FALSE ACCUSATIONS*

Michelman will protect any associate who raises a concern honestly. It is a violation of the Code to knowingly make a false accusation, lie to investigators or interfere/refuse to cooperate with a Code investigation.

### *NO RETALIATION*

Michelman values the help of associates who identify potential problems that Michelman needs to address. Any retaliation against an associate who raises an issue honestly is a violation of the Code. An associate who has raised a concern honestly, or participated in an investigation, cannot be subject to any adverse employment action, including separation, demotion, suspension, loss of benefits, threats, harassment or discrimination. If you believe someone has retaliated against you, report the matter to your manager, your Human Resources Business Partner, our Chief Financial and Risk Officer or the Michelman Ethics Hotline.

#### WHAT SHOULD I DO?

- Q - Culturally, it is not common to report a concern about someone that is in a leadership position. What should I do?
- A - It is important to say something about your concern. Michelman respects its diverse workforce, considers various cultural norms when looking into concerns and, when possible, takes reasonable and appropriate actions to protect the identity of the person who is sharing the information, as well as the information that is being shared.

### **SIGNATURE AND ACKNOWLEDGEMENT**

All new associates must sign an acknowledgement certificate confirming that they have read the Code of Conduct and Ethics and agree to abide by its provisions. All associates will be required to make similar acknowledgments on a periodic basis. Failure to read the Code or sign the acknowledgement form does not excuse an associate from compliance with the Code.

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## **INTEGRITY IN THE WAY ASSOCIATES ARE TREATED**

### **TREATMENT OF ASSOCIATES**

#### *WHAT IT MEANS*

We treat each other with respect and dignity. Each of us deserves a safe, clean, and welcoming place where we can do our best work.

We are one team, but we represent many ideas, experiences and backgrounds. We value each other's contributions and believe that everyone should have an equal chance to succeed. This is essential to advance our goals and initiatives. We all do our part to keep Michelman's workplace diverse, inclusive, and respectful by driving a positive environment, and recognizing the many strengths and talents our colleagues bring to the workplace.

#### *WHY IT MATTERS*

Different thoughts, abilities, experiences, and individual characteristics make our work environment richer and lead to better business decisions. When we are fully engaged and empowered, we drive innovation and create business solutions that benefit communities around the world.

#### *HOW WE DO IT*

Our Code of Conduct and Ethics reflects the principles that define how we treat each other, keep our work spaces safe, and provide equal opportunities for our workforce.

### **EMPLOYMENT PRACTICES**

Michelman utilizes fair employment practices, and we strive to provide a safe, healthful, and productive work environment for its associates.

### **COMPANY RULES, REGULATIONS AND INTERNAL PROCEDURES**

In addition to the Code, there are internal procedures in place serving unique and important business purposes. We are all responsible for being aware of and following these procedures and respecting their importance.

#### *EQUAL OPPORTUNITY*

Michelman believes that everyone should be treated with respect, and dignity. As an equal opportunity employer, Michelman provides equal opportunities for employment. We base employment decisions on merit, qualifications, skills and achievements. Michelman is committed to providing reasonable accommodation for team members and job applicants with disabilities.

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See our Non-Discrimination Policy and for our India-based associates, see our Equal Opportunity Policy for Persons with Disabilities. Both of these policies are located in the Appendix. These are also available on the Michelman Intranet. If you have any questions about them, please talk with your manager or Human Resources Business Partner.

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### WHAT SHOULD I DO?

Q - My manager often loses his temper and yells at all of the people on the team when we miss a deadline. Is this harassment?

A - It depends, but regardless, the situation creates a negative work environment. This behavior is something that Michelman would address because it violates the commitment we have made to a respectful workplace. Please speak with your Human Resources Business Partner or Michelman Ethics Hotline.

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Q - One of our suppliers is making insulting, age-related remarks to one of my co-workers. Should I say something?

A - Yes! If you are comfortable doing so, ask the supplier to stop. If you prefer, share your concerns with your manager, Human Resources Business Partner or Michelman Ethics Hotline. Michelman does not tolerate any form of harassment, whether the action is initiated by, or directed at, an associate, a customer, a supplier, a business partner or anyone else in our workplace.

### *NON-DISCRIMINATION AND HARASSMENT PREVENTION*

Michelman strives to foster a working environment that is free from unlawful discrimination, harassment, physical or mental punishment, or behavior not conducive to a productive work climate. We do not tolerate discrimination based on sex (including pregnancy, childbirth, and related medical conditions, lactation and breastfeeding), age, gender, race, color, creed, ethnic background, sexual orientation, gender identity or expression, national origin or ancestry, military service, disability, marital status, religious beliefs, genetic information or any other characteristics protected by applicable law.

Michelman does not tolerate harassment. Harassment is unwelcome and offensive conduct that interferes with a person's ability to perform their work. Harassment does not require intent to offend. Inappropriate conduct meant as a joke, a prank, or even a compliment, can lead or contribute to harassment. Any form of harassment by an associate, including sexual advances or other physical or verbal conduct of a sexual nature, will not be tolerated.

These provisions apply to interactions between associates, customers, contractors, suppliers, business partners, and applicants for employment.

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See our Non-Discrimination and Harassment policy and for our India-based associates, see our Prevention of Sexual Harassment at Workplace policy. Both of these policies are located in the Appendix. These are also available on the Michelman Intranet. If you have any questions about them, please talk with your manager or Human Resources Business Partner.

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### *SOCIAL DIALOGUE CLAUSE:*

At Michelman, we recognize the significance of fostering a collaborative and inclusive workplace where open communication and social dialogue thrive. The success of our organization depends on the collective contributions of our diverse workforce. This Social Dialogue Clause outlines the principles and expectations for engaging in positive interactions within our workplace.



**Open Communication:**

We encourage all employees to engage in open and transparent communication. Share your ideas, feedback, and concerns constructively, contributing to the growth and success of our organization.

**Respectful Interactions:**

All interactions, whether in person, online, or in written communication, should be conducted with respect and courtesy. Recognize and appreciate the diversity of perspectives, backgrounds, and experiences within our team.

**Inclusive Conversations:**

Strive to create an inclusive environment where everyone feels empowered to participate in discussions. Be mindful of differing communication styles and ensure that all voices are heard and valued.

**Conflict Resolution:**

In the event of disagreements or conflicts, we encourage employees to address issues promptly and professionally. Seek resolution through open dialogue, understanding, and, when necessary, involve appropriate channels for mediation.

**Confidentiality:**

Respect the confidentiality of information shared during social interactions. Uphold the trust placed in you by your colleagues and the organization by maintaining the privacy of sensitive information.

**Reporting Concerns:**

If you witness or experience behavior that goes against the principles outlined in this Social Dialogue Clause, we encourage you to report it through the appropriate channels. By adhering to these principles, we collectively contribute to a positive and collaborative workplace culture that reflects our commitment to excellence and mutual respect.

*PRESCRIPTION MEDICATION*

While working, associates should only possess and take drugs that are medically authorized or available over-the-counter. Subject to local applicable laws, anyone in a safety sensitive position, e.g. drivers, lab or plant-related positions, must notify their Human Resources Business Partner if they are taking medication that could impact the safety of the associate and/or coworkers.

## *SAFETY*

We follow safety procedures, and promote a culture of safety, because our people are our greatest asset. Every associate is empowered to take immediate action for the safety of our associates regardless of role, title or responsibility. If you see a situation that could put others at risk, take action, and at all times and in all places, work to keep yourself and your co-workers' injury-free.

Michelman commits to providing a clean, safe, and incident-free work environment for our associates, visitors, business partners and contractors working at our facilities. We expect everyone to adhere to the safety policies and procedures to prevent accidents and injury, and to minimize exposure to health risks. Michelman is committed to meeting all current, applicable health and safety rules, regulations and laws in the countries we operate in.

Every associate is responsible for making health and safety a priority and should:

- Promptly report unsafe or hazardous conditions to their manager and the Environmental Health & Safety (EHS) Department
- Comply with all policies, laws, regulations, and standards related to conditions for employment, including those concerning working conditions
- Comply with applicable workplace safety and industrial hygiene policies, laws, regulations, and standards If you have a guest visiting a Michelman facility, they will be expected to comply with Michelman safety standards.

## *PHYSICAL SECURITY*

Michelman has a zero-tolerance policy when it comes to acts or threats of violence. Be alert to what is going on around you, observe good security practices and speak up about any acts or threats of potential violence. Violators will be subject to disciplinary action and potentially criminal prosecution. If you are a victim of any threat or act of violence, or if you witness an act of violence, you should contact your manager or Human Resources Business Partner immediately. If at any point you believe that the safety of anyone, including yourself, may be in imminent danger, you should contact the local authorities.

## *SUBSTANCE ABUSE*

Michelman policy prohibits performing work duties while under the influence of alcohol, illegal drugs, and misused prescription drugs or over-the-counter medications. Substance abuse deteriorates the quality of your work, and can compromise safety. Any use, possession, sale, or transfer of illegal substances is strictly prohibited.

## *UPHOLDING HUMAN RIGHTS - INCLUDING CHILD AND FORCED LABOR*

Michelman respects the right of every associate and abides by employment laws in the markets where we operate. We support the principles established under the United Nations Universal Declaration of Human Rights and do not knowingly conduct business with any individual or company that participates in the exploitation of children (including child labor), physical punishment, forced or prison labor or human trafficking.

Even if some countries in which we operate permit the use of such labor, the laws of the United States will set the standard for all labor and employment policies at Michelman. We will also comply with any local laws of the countries in which we operate that may have higher standards than those in the United States.

In the absence of any national or local law, we define "child" as less than 15 years of age. If local minimum age law is set below 15 years of age, but is in accordance with developing country exceptions under International Labor Organization (ILO) Convention 138, the lower age will apply.

Michelman will not conduct business with customers, suppliers, business partners, vendors, etc. employing children, prisoned, indentured or bonded labor, or using corporal punishment or other forms of mental and physical coercion as a form of discipline.

### *WAGE AND HOUR PRACTICES*

Michelman pays our associates a competitive wage, as benchmarked with other leading companies. Consistent with our principle of valuing personal mastery, we reward associates for improving their skills and capabilities. Michelman is committed to complying with all applicable wage and hour laws, and rules and regulations including minimum wage, overtime, and maximum hours in the countries where we employ associates.

### **PERSONAL DATA**

Confidence and trust are essential to the relationships between all of us. We are committed to promoting a work environment, and operating our businesses, with a continual effort toward fostering these relationships. Critical to achieving this goal, we must properly manage the personal data provided to us by you, our colleagues, customers, suppliers, business partners, etc.

Personal data includes any information that may personally identify an individual, such as name, address, email, identification numbers, or any combination of such information that could be used to identify someone and includes sensitive personal data or information (e.g. passwords, financial information such as bank accounts, credit or debit card or other payment instrument details, physical/physiological/medical health condition, sexual orientation, medical record, history and biometric information).

We must only collect, use, access, or disclose personal data for appropriate business purposes, and should only use the minimum amount of personal data necessary to accomplish a task. We must take steps to properly secure data, and must not share personal data with anyone, either inside or outside our Company, who does not have proper authorization to access it.

Michelman follows all pertinent data privacy laws and regulations in all of the countries we operate. When other companies are handling personally identifiable data, we require them to abide by our privacy practices as they relate to the data.

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See our Michelman, Inc. & Affiliates policy, available in the Appendix. It is also available on the Michelman Intranet. If you have any questions, please talk with your manager, Human Resources Business Partner or our Chief Financial and Risk Officer.

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#### WHAT SHOULD I DO?

- Q - One of our new vendors wants to say “hello” by sending everyone on my team a couple free samples of their product. The vendor has asked me for a list of my co-worker’s names and addresses. Is it ok to provide them?
- A - Even if the intent behind the request is well-meaning, and even if your co-workers might like receiving the samples, supplying this information would violate our commitment to keeping private information private.

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## INTEGRITY BASED UPON COMPANY'S BEST INTERESTS

### OVERVIEW

We must hold our conduct to the highest standards of integrity and business ethics. This requires each of us to continually monitor our relationships and personal interests, in an effort to ensure that they do not conflict with the performance of our duties at Michelman.

### CONFLICTS OF INTEREST

#### *WHEN DOES A "CONFLICT OF INTEREST" OCCUR?*

A conflict of interest occurs when a personal relationship, or activity, could influence your judgment, and ability to perform your job objectively and uphold your responsibilities at Michelman. Even the appearance or perception of a conflict of interest can place Michelman at risk. By discouraging and avoiding conflicts of interest, we send a clear message about upholding our integrity and determination to do what is right.

It is not always clear whether an activity creates a conflict of interest. However, it is the responsibility of every associate to disclose a potential conflict. Associates should discuss any potential conflicts, or questions about how to best handle a situation where a conflict might exist, with their manager, Human Resources Business Partner, our Chief Financial and Risk Officer or the Michelman Ethics Hotline.

#### *OUTSIDE EMPLOYMENT*

You may be employed outside of Michelman as long as your outside employment does not interfere with your ability to do your job with Michelman. You may not be employed by, or otherwise provide services for or receive payment from, any customer, supplier, business partner or competitor of Michelman without prior written approval from your manager and Human Resources Business Partner. If employment is permitted outside of Michelman, the associate, manager and Human Resources Business Partner will review if it will continue every six (6) months.

#### *OUTSIDE SPEECHES AND PRESENTATIONS*

You must have prior written approval from your manager and Human Resources Business Partner before accepting reimbursement for expenses, or any other payment, for speeches or presentations outside of Michelman if one of these applies to your situation:

- You are giving the speech or presentation as part of your job with Michelman
- The speech or presentation describes your work with Michelman.
- You are formally identified at the speech or presentation as an associate of Michelman.

#### *EXAMPLES OF COMMON CONFLICTS OF INTEREST*

Below are examples of situations where a conflict of interest exists. This list is intended to provide you with examples which may help you identify conflicts of interest when they arise, but it is not intended to be a comprehensive list.

- Consulting or employment relationships with any customer, supplier, business partner or competitor.
- Engaging in outside business activities or employment that could be competitive with any of the Michelman's businesses, or that requires your use of Michelman resources or information.
- Engaging in outside business activities that call into question your ability to devote appropriate time and attention to your job responsibilities with Michelman.
- Personally, benefitting from knowledge learned through your employment with Michelman.
- Payments to consultants or other professionals who are not properly under contract, who have not been thoroughly vetted, or whose association with Michelman could be embarrassing.
- Consulting or other similar business relationships between a Michelman associate and another Company, especially a competitor.
- Expenditures, bonuses, awards, and non-cash gifts given to or by Michelman associates without proper approval and adequate documentation.
- Payments made into the bank account of an individual rather than into the account of a company, payments made in cash, or checks not drawn to credible parties.
- Billings disproportionate to normal prices for fees, and made at a customer's request.
- Payments made for a purpose inconsistent with those described in supporting documents, or made through intermediaries.

#### *ENTERTAINMENT, GIFTS, FAVORS, AND PAYMENTS*

Michelman treats all persons and companies with whom it has business relationships fairly and impartially. The acceptance of gifts, entertainment, favors, personal discounts, and similar gratuities might influence or raise doubts as to the impartiality of the recipient. As such, you and members of your family must not give or receive any such gratuity to or from any person associated with customers, suppliers, vendors or business partners, except as outlined below:

- Do not accept gifts in exchange for doing, or promising to do, anything for customers, suppliers, vendors or business partners.
- Do not ask for gifts from customers, suppliers, vendors or business partners.
- Do not accept gifts of cash or cash equivalents, such as gift cards.
- Do not accept gifts of more than modest value.
- Modest gifts, for example, a logo pen or t-shirt or a small gift basket at holiday time are acceptable.
- Gifts of symbolic value, such as trophies and statues that are inscribed in recognition of a business relationship are acceptable.
- Gifts or discounts offered to a large group of associates, as part of an agreement between Michelman and customers, suppliers, vendors or business partners may be accepted and used as intended by the party giving them.

Our Chief Financial and Risk Officer must approve acceptance of gifts, meals or entertainment that exceeds the above limitations in writing.

### *MEALS AND ENTERTAINMENT*

- Do not accept meals or entertainment in exchange for doing, or promising to do, anything for customers, suppliers, vendors or business partners
- Do not ask for meals or entertainment from customers, suppliers, vendors or business partners
- You may accept occasional meals and entertainment from customers, suppliers, vendors or business partners if the event is attended by the customer, supplier, vendor or business partner, and the costs involved are in line with local custom for business-related meals and entertainment. For example, ordinary business meals and attendance at local sporting events generally are acceptable.

### *TRAVEL AND PREMIUM EVENTS*

If you are invited by a customer, supplier, vendor or business partner to an event involving out-of-town travel or overnight stay, or to a premium event, e.g. the Super Bowl or World Cup, consult your manager to determine if there is adequate business rationale for your attendance. If there is, Michelman should pay for your travel and attendance at the event.

### *REFUSING GIFTS, MEALS, AND ENTERTAINMENT*

If you are offered a gift, meal or entertainment that exceeds the limits noted above, politely decline and explain Michelman's policy.

If returning a gift would offend the giver, or the circumstances under which it was given preclude its return, you may accept the gift after talking with our Chief Financial and Risk Officer, who will work with you to donate the item to charity, or to distribute or raffle the item among a large group of associates.

### *GIFTS, MEALS, AND ENTERTAINMENT FOR CUSTOMERS, SUPPLIERS, VENDORS, AND BUSINESS PARTNERS*

Gifts, meals and entertainment for customers, suppliers, vendors or business partners must support the legitimate business interests of Michelman and should be reasonable and appropriate under the circumstances. Always be sensitive to our customers', suppliers', vendors', and business partners rules on receiving gifts, meals and entertainment.

### *TICKETS AND HOUSING FOR PERSONAL USE*

Tickets to sporting events or other entertainment venues that are offered by a customer, supplier, vendor or business partner for your personal use, without attendance by the customer, supplier, vendor or business partner, are considered gifts. They should not be accepted, unless offered to a large group of associates as part of an agreement between Michelman and the customer, supplier, vendor or business partner. The same is true of personal use of a condominium or vacation home, or personal travel on a private aircraft, boat or otherwise.

If you have any doubts or questions about the appropriateness of a gratuity under our Code, seek advice from your manager, Human Resources Business Partner or our Chief Financial and Risk Officer.

### *NO INTERESTS IN OTHER BUSINESSES*

Financial relationships with another business can compromise your loyalty to Michelman, particularly if members of your immediate family are employed by that business. While family members are not precluded from being employed by our customers, suppliers, vendors, business partners or competitors, you must avoid conducting Michelman business with members of your family or those with whom you may have a significant personal relationship.

Additionally, you may not directly invest or hold equity (beyond a nominal ownership stake) in companies that are customers, suppliers, vendors, business partners or competitors of the Company without disclosure and approval. Indirect investments through mutual funds do not fall within this restriction. For purposes of this Code, "nominal" means up to one thousand (1,000) shares. If you have investments, or are considering investments, that could be in violation of our Code, you must report and disclose the investment to our Chief Financial and Risk Officer.

### *RELATIONS WITH CUSTOMERS, SUPPLIERS, VENDORS, AND BUSINESS PARTNERS*

Relationships with customers, suppliers, vendors or business partners may present circumstances where gifts or favors are exchanged as an accepted business practice. For example, our Code does not prohibit attendance at athletic, cultural, or community events as the guest of customers, suppliers, vendors or business partners or other such entertaining when done as business courtesy in a reasonable manner, such as paying for a meal as part of a business meeting.

However, if such courtesies become a common, one-way practice, they could be perceived as a gift in the aggregate. You should ensure that such courtesies are reciprocated, to the extent practicable, in order to prevent any perception that it was a gift.

Take particular care if you are responsible for selecting or dealing with customers, suppliers, vendors or business partners on behalf of Michelman. Your personal interests and relationships must not interfere, or appear to interfere, with your ability to make decisions in the best interest of Michelman.

If you have any doubts or questions about the appropriateness of customer, supplier, vendor or business partner activities, seek advice from your manager, Human Resources Business Partner or our Chief Financial and Risk Officer.

### *WORKING WITH FAMILY MEMBERS*

If you are in a position of managing, reviewing, or having any influence on the job evaluation, pay or benefits of any member of your immediate family, it will present a conflict of interest. Accordingly, associates must avoid a direct reporting relationship with any member of their family or others with whom they have a significant relationship. If such a relationship exists or occurs, you must report it to your manager, Human Resources Business Partner or the Michelman Ethics Hotline.



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See our Employment of Relatives policy in the Appendix. It is also available on the Michelman Intranet. If you have any questions, please talk with your manager, Human Resources Business Partner or our Chief Financial and Risk Officer.

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#### **WHO IS MY "RELATIVE" UNDER THE CODE?**

A spouse, parent, sibling, grandparent, child, grandchild, mother- or father-in-law or same or opposite sex domestic partner are all considered relatives. Also included is any family member who lives with you or who is otherwise financially dependent on you, or on who you are financially dependent. Even when dealing with family members beyond this definition, take care to ensure that your relationship does not interfere, or appear to interfere, with your ability to act in the best interest of Michelman.

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## FINANCIAL INTEGRITY AND PROTECTING OUR ASSETS

### MICHELMAN PROPERTY AND INFORMATION

#### *ELECTRONICALLY PROTECTING INFORMATION*

When working with Michelman information or equipment, e.g. laptops, mobile phones, databases, etc. associates should set-up passwords that cannot be easily guessed and should never be shared. Michelman information should only be stored with approved Internet or cloud services as that information may not be protected and may be accessed by unauthorized people. If you are uncertain if an internet or cloud service is approved, contact your Information Technology department.

#### *THEFT OF MICHELMAN ASSETS*

Associates have the responsibility to protect our assets from misuse, loss, waste, damage or theft. Theft of Michelman assets happens through embezzlement, intentional misreporting of time or expenses or physical theft of products, equipment, intellectual property, supplies, etc. If you are aware of an associate stealing from Michelman, immediately report it to your manager and/or Human Resources Business Partner. An associate may be terminated and/or face criminal prosecution for failure to protect our assets from misuse, loss, waste, damage or theft.

#### *USE OF MICHELMAN ASSETS AND EQUIPMENT*

Although limited personal use of certain Michelman assets and equipment, e.g. computers and mobile telephones, may be appropriate, it should never:

- Interfere with or prevent you from fulfilling your job responsibilities.
- Be used for outside businesses.
- Used for illegal or unethical activities such as gambling, pornography or other offensive subject matter.

#### **EXAMPLE**

##### **A Personal Favor**

An associate used Michelman's computers, equipment, and time at work, to design and print wedding invitations and birth announcements as a favor for other associates. The associate misused Michelman's assets.

#### *CONFIDENTIAL AND PROPRIETARY INFORMATION*

Our intellectual property and trade secrets are irreplaceable assets. We must secure and protect the use of these valuable assets. You may have access to sensitive information that is confidential or proprietary to Michelman. You must ensure that any use or disclosure of sensitive information is only for Michelman purposes, and never for personal gain or competing interests.

The following should be kept in mind when handling confidential and proprietary information:

- Confidential proprietary information can come in many forms. This may include, but is not limited to, customer data, employee personal data, sales information, HR-related information, legal information, internal documents, business plans, pricing strategies, manufacturing processes, formulas, as well as information protected legally by federal, state, and local law, including, but not limited to, copyrights, trademarks, patents, and trade secrets.
- Your obligation to maintain the confidentiality of confidential proprietary information is ongoing, and continues even after your employment with Michelman ends.
- The internal disclosure of confidential and proprietary information to other Michelman associates should be limited to those who have a need to know.
- All external disclosures of confidential and proprietary information must be evidenced by an appropriate non-disclosure agreement approved by Legal. If Michelman is in a confidentiality agreement with business partners, you are also bound by the terms of those agreements and obligated to maintain confidentiality.
- In similar fashion, Michelman protects your information. Personnel files of associates are considered confidential and are strictly guarded. Information will only be released if for a legitimate purpose, and only to a person with the proper authority or with your written authorization.

Improper use or disclosure of confidential proprietary information can amount to a civil cause of action, and in some cases, criminal prosecution. However, in the United States, an associate may receive immunity from liability for disclosing confidential information or a Trade Secret, if that disclosure is to the United States Government or in a United States court filing in accordance with applicable laws. In accordance with 18 U.S.C. § 1833(b), an associate may not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret where the disclosure: (i) is made in confidence to a federal, state, or local government official, either directly or indirectly, or to an attorney, and solely for the purpose of reporting or investigating a suspected violation of law; or (ii) is made in a complaint or other document filed in a lawsuit or other proceeding, if the filing is made under seal.

If you question whether information may be confidential and proprietary, seek advice from your manager, Human Resources Business Partner or our Chief Financial and Risk Officer.

#### **WHAT SHOULD I DO?**

- Q - I am a marketing manager and have volunteered to teach a course on marketing at a local university. I believe that my students would benefit from a discussion on how Michelman developed several marketing campaigns. Can I discuss this work in class?
- A - Only with prior approval from the Chief Marketing Officer or Chief Financial and Risk Officer. The development of marketing campaigns is a Michelman work product and asset. Much of this work may be proprietary, and may not be appropriate to reveal outside the Company.

## INTELLECTUAL PROPERTY

We must all be knowledgeable of the intellectual property belonging to Michelman, and work diligently to protect it. Intellectual property includes patents, trademarks, copyrights, or other intangible assets, such as ideas, inventions, processes, designs or research and development created by or for Michelman. This includes intellectual property created by anybody at Michelman's expense, with Michelman's resources or within the scope of his or her job duties.

At all times, associates should take precautions to protect our intellectual property.

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If you have any questions, please talk with your manager, Human Resources Business Partner, or our Chief Science & Sustainability Officer.

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### EXAMPLE

#### **A New Formula**

One of Michelman's scientists was excited about the upcoming launch of a new product that they had worked on, and shared details about the product with family and friends. The Scientist improperly disclosed confidential proprietary information.

## BUSINESS AND FINANCIAL RECORDS

Ensuring accurate and complete business and financial records is everyone's responsibility. Accurate recordkeeping and reporting reflect on Michelman's reputation and credibility and ensures that Michelman meets its legal and regulatory obligations.

- Always record and classify transactions in the proper accounting period and in the appropriate account and department. Do not delay or accelerate the recording of revenue or expense to meet budgetary goals.
- Estimates and accruals must be supported by appropriate documentation and be based on best judgment.
- Ensure all reports to regulatory authorities are full, fair, accurate, timely, and understandable.
- Never falsify any document.
- Do not distort the true nature of any transaction.
- Never enable another person's efforts to evade taxes or subvert local currency laws. Payments should be made only to the person or firm that actually provided the goods or services. Payments should be made in the supplier's home country, where it does business, or where the goods were sold or services provided, unless the supplier legitimately has assigned payment or sold its accounts receivable to another entity. Exceptions must be approved by our Chief Financial and Risk Officer.
- No undisclosed or unrecorded Michelman funds may be established for any reason, nor should Michelman's funds ever be placed in any non-corporate account.
- Do not make any false, incomplete or misleading entries into Michelman's

- books or records.
- Never make any misleading statements during the course of an examination by internal or external auditors

#### WHAT SHOULD I DO?

Q - I don't work in finance or accounting. Is "financial integrity" my responsibility?

A - Yes, accuracy in recordkeeping isn't the job of one team or department. It is a responsibility we all share. From expense reports and benefit enrollment forms to test data and sales invoices - all of our everyday transactions must be accurate, complete, and properly recorded.

### **FINANCIAL REPORTING RESPONSIBILITIES**

Those with financial reporting responsibilities at Michelman have a heightened responsibility to ensure fair and timely reporting of our financial condition. As a consequence, you must:

- Perform your duties with honesty and integrity, and promote ethical behavior in your actions with fellow associates and in the communities in which we operate.
- Perform your duties responsibly, competently, diligently, and in good faith. Proper care will ensure that you properly represent material facts and disclosures, and achieve responsible use of and control over our assets and resources. Special care should be given to filings or submissions to government agencies, and any other public communications.
- Avoid any conflicts of interests that may arise in your professional duties and personal relationships.
- Be knowledgeable of the applicable laws, rules, and regulations of all governmental jurisdictions and agencies to which you report or operate. Perform your duties in full compliance.
- Always maintain the confidentiality of information that you acquire in the performance of your duties, whether that information belongs to the Company, customers, competitors or other business partners. In some cases, you may be under a legal obligation to disclose confidential information. Take care to ensure that any disclosure of such information is only to an authorized party. Never use any confidential information for your own personal gain.
- If you believe a violation of our Code, any policy, or our business ethics has occurred, or may occur, report the situation immediately to your manager, Human Resources Business Partner, our Chief Financial and Risk Officer or the Michelman Ethics Hotline.

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## **INTEGRITY IN DEALING WITH OTHERS**

### **OVERVIEW**

When we enter the marketplace, we engage with governments, customers, suppliers, competitors, and other business entities. Our conduct is governed by our ethical duty to act responsibly in the marketplace and our obligation to comply with all applicable laws governing our activities in the various jurisdictions in which we do business. If you have knowledge of a real or potential violation of any of the policies or laws discussed below, you must report it to your manager, Human Resources Business Partner, our Chief Financial and Risk Officer or the Michelman Ethics Hotline.

### **ENGAGING OUR CUSTOMERS, SUPPLIERS, VENDORS, AND BUSINESS PARTNERS**

Our products must always meet our customers' expectations and we should continually strive to exceed their expectations. We each have a duty to comply with our quality control standards, all applicable laws, and industry standards to ensure that we safely continue to produce products that live up to the Michelman name.

Our products will stand for themselves. When we engage the competitive marketplace, we should always treat our competitors, business partners, and customers in a fair and honest manner. By acting consistently with our highest standards of integrity, we can develop long-term relationships, thereby creating sustainable and high-quality supply-chains that enable us to develop our product and reach our customers.

Always deal fairly with our customers, suppliers, vendors, and business partners by treating them honestly and with respect:

- Do not engage in unfair, deceptive or misleading practices.
- Always present Michelman products in an honest and forthright manner.
- Do not offer, promise or provide anything to a customer, supplier, vendor or business partner in exchange for an inappropriate advantage for Michelman.

### **THIRD PARTY PROPERTY AND INFORMATION**

#### *CUSTOMER, SUPPLIER, VENDOR, AND BUSINESS PARTNER PROPERTY*

During the course of your employment, you may become knowledgeable about sensitive information that is confidential, private, or proprietary to our customers, suppliers, vendors or business partners. It is our responsibility to use, store, access, and safeguard any such information in a manner consistent with our obligations to protect Michelman information. We must only use the information for business purposes approved by our customer, supplier, vendor or business partner, and that complies with all applicable laws.

#### *SUPPLIER AND COMPETITOR CONFIDENTIAL INFORMATION*

In addition to safeguarding Michelman's trade secrets and confidential information, all associates must refuse any improper access to trade secret and confidential information of any other company, including our competitors. Confidential information can include any information which is not generally disclosed to the public, is useful or helpful to a company's operation, and would be useful or helpful to its competitors. Common examples include financial and scientific data, new product plans, supplier and customer lists, wage and salary

information, projected earnings, changes in policies, manufacturing methods, suppliers' prices, or any other operational plans.

#### WHAT SHOULD I DO?

Q - We just hired an associate who recently worked for one of our competitors. May I ask the associate for confidential information about our competitor?

A - Never ask a former associate of a competitor about any information that the person is under a legal obligation not to reveal. This would include any of our competitor's trade secrets and other confidential information too.

Q - As I prepare to propose a deal to a customer, the customer offers me a presentation containing our competitor's proposal so that we can respond. May I accept it?

A - Perhaps. First, ask whether the customer is prohibited from sharing this information by a confidentiality agreement. If the customer confirms that it is under no obligation to protect the information, you may accept the information. Once you have the presentation, if it is marked "confidential" or "proprietary" consult our Chief Financial and Risk Officer before disclosing or using the information.

We expect that our customers and business partners will take no action contrary to the principles of our Code. Accordingly, the owner of each customer, supplier, vendor, and business partner relationship should ensure that adherence to the Code of Conduct and Ethics for Suppliers is a condition of the supplier agreement.

See our Supplier Code of Conduct and Ethics in the Appendix. It is also available on the Michelman Intranet. If you have any questions, please talk with your manager, Human Resources or Procurement representatives or our Chief Financial and Risk Officer.

## **GOVERNMENT RELATED ACTIVITIES**

### *GOVERNMENT BUSINESS*

Our work may involve contracts with government entities. Special requirements might apply when contracting with a government body, domestic or international. We have a duty to be knowledgeable of and follow the applicable policies and laws governing such transactions. When engaging government contractors, we must:

- Provide accurate statements and records to any government customers that are consistent with applicable laws and contractual agreements.
- Never accept information that could give Michelman an unfair competitive advantage in a bidding process.
- Never offer or accept kickbacks, bribes, gifts, gratuities, or anything else of value with the intent of obtaining favorable treatment.
- Be careful to only use contractors or agents for legitimate business purposes after conducting thorough due diligence.
- Make full and accurate representations of pricing, or of Michelman products, which are covered by government contracts.
- Hiring government personnel must be done in compliance with all applicable laws and regulations.

## *GOVERNMENTAL INVESTIGATIONS AND LITIGATION*

It is the responsibility of each of us at Michelman to provide truthful and accurate information to any government authorities during investigations, along with any other associated reporting obligations.

If you encounter a request for information by a government agency or entity, notify the government investigator that Michelman complies with such requests, and that you must convey the request to your manager, our Chief Financial and Risk Officer, and your Executive Leadership Team representative immediately.

If you receive a threat or notice of litigation against Michelman, notify your manager, our Chief Financial and Risk Officer, and your Executive Leadership Team representative immediately, regardless of perceived merit.

## **ANTITRUST COMPLIANCE**

Michelman's policy requires strict compliance with all applicable antitrust laws, and adherence to the basic competitive principles which they serve. We are expected to comply with all applicable antitrust laws. Violations can be very serious, and may expose Michelman, and potentially you, to criminal and civil penalties.

When dealing with representatives of other companies, you must be cautious to prevent any activity from being considered or likely to be considered a violation of any antitrust law. Activities such as price fixing, bid rigging, dividing or allocating markets, and boycotting are strictly prohibited and almost always illegal. You should never discuss these topics with an outside party. If someone suggests any of these activities, or accuses Michelman of engaging in them, you must report the incident to your manager or our Chief Financial and Risk Officer.

Antitrust laws can also function to prohibit agreements with suppliers, distributors, business partners, or customers when they serve to restrict competition both globally and domestically. If you are involved in making agreements, you should be knowledgeable of the rules of antitrust conduct in all jurisdictions and countries where we do business.

## **INTERNATIONAL TRADE CONTROLS, IMPORT, AND EXPORT**

Michelman is committed to full compliance with all applicable trade laws in all the countries in which we operate, procure materials, or otherwise transact business. This includes import and export control laws, and any other regulations set forth by the applicable jurisdictions.

It is essential for those of us at Michelman who deal with the import and export of goods to have knowledge about the varying international trade control laws which govern the transactions that we are involved in. It is equally as important that we keep accurate information on all such related transactions in the event an issue does arise. For the purposes of the United States export laws, an export occurs in each of the following situations:

- Goods are shipped, or technology is made available, from the United States to a foreign country.
- Goods are shipped, or technology is made available, from a non-United States



- country to another country if the goods or technology originated in the United States.
- Goods are shipped, or technology is made available, to a person in one non-United States country with a Michelman associate or agent having knowledge, or intending, that the goods or technology will later be transferred to another country.
  - When technology is made available to a foreign national, including foreign national associates in, or outside, the United States.

Technology is “made available” through a variety of means, including visual inspection of technical specifications, plans or blueprints, oral discussions of technology, or practice or application of the technology under the guidance of persons with knowledge of the technology. Even plant visits by foreign nationals could result in an export of technology.

Michelman is located in member states of the United Nations that are committed to implementing the United Nations Security Council Resolutions (UNSCRs). Among other measures, the UNSCRs may impose targeted financial sanctions against specific individuals and entities identified by the United Nations Security Council (or relevant United Nations Committees) as contributing to a particular threat to, or breach of, international peace and security. Michelman follows the UNSCRs resolutions regarding exporting.

Please refer any questions regarding the list of sanctioned countries to our Chief Financial and Risk Officer.

## **OTHER IMPORTANT LAWS AND REGULATIONS**

### *FOREIGN CORRUPT PRACTICES*

Michelman requires that all associates, agents, and business partners fully comply with the United States Foreign Corrupt Practices Act, Singapore’s Prevention of Corruption Act or any other applicable laws. Under these Acts, it is illegal to, in an effort to obtain, retain, or direct business, make any corrupt offer, payment, promise to pay, or authorization to pay any money, gift, or anything of value to any foreign official, or any foreign political party, candidate, or official, for the purpose of influencing such official or to use influence to affect decisions of a foreign government or agency. Any such payment to any other person, if the payment will have the same effect, is also prohibited. Many other countries have similar legislation.

### **THE UNITED STATES FOREIGN CORRUPT PRACTICES ACT**

Because Michelman is incorporated in the United States, the United States Foreign Corrupt Practices Act, which prohibits bribes to officials of non-United States governments, applies to all associates around the world. Michelman will also adhere to similar laws in the countries we operate in and they have been listed in this policy per review by our outside legal counsels.

### **“ANYTHING OF VALUE”**

This phrase literally means anything that might have value to a government official, including cash, gifts, meals, entertainment, business opportunities, Michelman’s products, offers of employment or more. There is no monetary threshold; any amount could be construed as a bribe.

#### *BRIBERY AND CORRUPTION*

Michelman does not condone bribery, which is a payment given or received in exchange for an official action, in any form. For example, a payment to a customs official to overlook a violation is an illegal bribe. Typically, both parties to such an exchange are deemed to be acting unlawfully, regardless of whom solicited the transaction. Even though other companies make such payments, it is against our values. Furthermore, the use of an intermediary provides no relief when he or she acts illegally on your behalf. If you are faced with a solicitation, the law provides other options, including notifying officials, the police, or a public prosecutor.

#### *USING THIRD-PARTY COPYRIGHTED MATERIAL*

You may, at some point, have a need to use third-party copyrighted materials in the performance of your job responsibilities. Prior to using such material, Michelman must receive authorization from the copyright holder. Michelman's policy prohibits the use of Michelman's resources to copy, reproduce, digitize, broadcast, or modify third-party copyrighted material absent such authorization. Failure to do so could result in possible civil and criminal actions for copyright infringement against you and Michelman.

#### *SALE AND PURCHASE OF GOODS AND SERVICES*

All transactions involving the purchase or sale of goods and services must be made with full disclosure in accordance with all applicable laws. All sales must be properly billed to the purchaser by written invoice describing in reasonable detail the goods and services, the exact consideration exchanged and owed to the company, and any specific or unique terms to the transaction. All payments made by the company for goods and services must be supported by appropriate documentation reflecting the purpose of the payment, and shall be made by check, draft, corporate charge, or other documentary transfer drawn to the order of the party. Purchases must be made pursuant to written contract, except for routine purchases arising out of Michelman's ordinary course of business. Payments should be made directly to a party's account located in the country where the party resides.

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## INTEGRITY IN OUR COMMUNITIES

### OVERVIEW

Michelman is committed to respecting the local laws and customs of the communities in which we operate. By working together with our communities, we can establish sustainable relationships, have a positive impact, and encourage a respect for our environment.

### OUTSIDE SERVICE AS AN OFFICER OR DIRECTOR

In general, you may serve as an officer or member of the board of directors of another for-profit business only with prior written approval of your manager and Human Resources Business Partner.

Approval is not required for:

- Service as an officer or director of another company at the request of Michelman.
- Service as an officer or director of a charitable or other non-profit institution or trade organization, or for service as an officer or director of a family-owned business, unless the business is a customer, supplier, vendor, business partner or competitor of Michelman.

### POLITICAL ACTIVITY AND CONTRIBUTIONS

Michelman encourages everyone to be civically involved, to vote, and to engage the political process on an individual basis. However, laws in some countries restrict any use of company assets in connection with contributions to any political candidate or party, political actions committee or ballot measure. This includes company equipment, premises, funds, and associate work time.

Only the Executive Leadership Team has the authority to represent Michelman's support for any candidate or issue, use, or authorize the use of Michelman's resources for a political or social cause determined to benefit Michelman as a whole.

#### *PERSONAL POLITICAL ACTIVITY*

- Michelman will not reimburse associates for personal political activity.
- Your job will not be affected by your personal political views or your choice in political contributions.
- Do not use Michelman's name, reputation or assets, including your time at work, to further your own political activities or interests.
- If you plan to seek or accept a political office or position, you must obtain prior written approval from your manager and Human Resources Business Partner.

### **WHAT SHOULD I DO?**

- Q - My friend is running for political office, and I would like to help with the campaign. Is this allowed?
- A - Yes. Your personal political activity is your business. Just make sure that you do not use Michelman resources, including Michelman time, e-mail or Michelman's name, to advance the campaign.

## **NOT SPEAKING ON BEHALF OF MICHELMAN**

When you consider the power of words, the number of ways that words can be shared and the impact those words can have on a trusted company like ours, you begin to understand the value of sending a clear message. In order to ensure that accurate and complete information is conveyed to the public, to regulatory authorities and to others, we have designated individuals to serve as our official company spokespersons. Unless you are authorized to do so, do not make any public statements on Michelman's behalf.

## **USE OF SOCIAL MEDIA**

Social media includes any digital communication channels that allows you to create and share content, and post comments. Michelman respects your rights to use social media for personal and professional purposes. However, you are responsible for complying with Michelman's policies and procedures when communicating on social media and are accountable for any information published online.

Our social media and other policies apply to both personal and professional communications that may impact Michelman. In personal activities on social media, you should remember that your conduct may impact the way others view who we are and what we stand for as a Company.

Be alert to reporting obligations, including adverse event reporting procedures and protecting Michelman's confidential information. You should be mindful of the content created, shared, and posted. Remember, the Internet is a public place. Always use good judgment when engaging in social media.

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See our Social Media policy in the Appendix. It is also available on the Michelman Intranet. If you have any questions, please talk with your manager, Human Resources Business Partner or our Chief Financial and Risk Officer.

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### **WHAT SHOULD I DO?**

- Q - I saw a blog post that is critical of Michelman and contains inaccurate information about one of our products. I know the facts about that product and want to set the record straight. Is that okay to post a response online?
- A - No, unless you are an authorized spokesperson, you should refer them to Michelman's Strategic Communications Department so they can address the situation.

## **ENVIRONMENTAL LAWS GENERALLY**

Michelman is committed to making every effort to protect the local and global environment as a good corporate citizen. We will conduct our operations with the highest regard for the quality of the environment, maintaining a continual concern for problems such as global warming, ozone depletion, acid rain, pollution of the oceans, trans-border transport of hazardous waste, and pollution in developing countries. We can best achieve these goals by a focus on water, air, and general land usage.

We will comply with all applicable environmental laws, including those which regulate the emission of pollutants into surface and underground waters, and the handling and disposal of wastes. At every operating location where emissions into water sources or the atmosphere or solid waste disposal are present, we will comply with standards established by appropriate local, state, federal, or international entities, consistent with available technology.

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## **UPHOLDING THESE STANDARDS**

You are expected to uphold Michelman's Values, our Code of Conduct and Ethics, policies, and the law. This means you must:

- Read, understand, and comply with the Code of Conduct and Ethics and its related policies, laws, and regulations that apply to your job.
- Speak up when you see possible violations of the Code of Conduct and Ethics and its related policies, and legal and regulatory requirements.
- Be truthful, and cooperate fully in any internal investigations. Do not conceal or destroy information.
- Complete training on the Code of Conduct and Ethics and its related policies, and attest that you understand and commit to comply with the Code.

Failing to read or attest to the Code of Conduct and Ethics does not excuse you from these responsibilities.

## **APPLICABILITY**

The Code of Conduct and Ethics applies to all Michelman associates.

## **ENFORCEMENT AND WAIVERS**

The Code of Conduct and Ethics is important to us. Violation of this Code and its related policies may result in disciplinary action, up to and including termination of employment.

## Appendix – Global Supplier Code of Conduct and Ethics

Updated 12.31.23

This Supplier Code of Conduct and Ethics is based on the internationally recognized environmental, social and corporate governance (ESG) standards. In this Code of Conduct and Ethics, the term “suppliers” covers any natural person or legal entity providing services or supplying other goods. Each Supplier is responsible for compliance with the standards set out in this Supplier Code of Conduct and Ethics throughout its operations and throughout its entire supply chain.

Michelman, Inc. (together with its subsidiaries, “Michelman”) is committed to operating as a responsible company, and to comply with all applicable local, national, and international laws, as well as promoting economic, societal and environmental sustainability in its activities. We expect our suppliers to comply with the principles set forth in this Supplier Code of Conduct and Ethics.

We are also dedicated to continuous improvement and will favor collaborating with our supplier partners who not only adhere to ESG standards but also apply best practices as outlined below.

### PURPOSE

Michelman’s purpose is to **innovate a sustainable future**, and we will achieve our purpose by partnering with suppliers, and other stakeholders, who share in our vision. We are committed to partnering with companies who share our tireless approach to making the environment in which we live and work, safer and more sustainable for all, to improving the sustainability of our operations by eliminating waste to landfill, reducing wastewater, and eliminating substances of concern. We believe in this purpose because it who we are, and what we have been committed to since Michelman was founded in 1949.

### Vision

Michelman is an evergreen, multi-generational, people-first, purpose driven, values-based, family business. We are building a business for future generations, and to do so, we engage a diverse group of associates to make the world a better place for all stakeholders.

### Values

The Michelman Values guide us in everything we do from hiring to selecting partners with whom we do business. Our Values: **Integrity, Respect, Curiosity, Success, Collaboration and Giving** are a direct reflection of who Michelman is, and how Michelman and its associates conduct business globally. We believe how we live these Values is the driving force behind our success.

Michelman’s suppliers are valued partners in the success of its business. Michelman’s relationships with its suppliers must be grounded in honesty and fairness. Suppliers are selected on a competitive basis based on total value, which includes quality, service, technology and price. Terms and conditions defining its relationship with suppliers are communicated during the supplier selection process and agreements to such terms and conditions, or any acceptable modifications, are reached before work begins. Included in these standard terms and conditions are Michelman’s policies regarding payment terms, confidentiality, the use of intellectual property, and labor practice expectations.

Michelman is committed to running its business in accordance with applicable laws and regulations. Michelman expects its suppliers to comply with the principles set forth herein and all laws applicable to their activities and operations, including laws related to ESG Standards.



## ENVIRONMENT

### Continuous Improvement

Michelman strives to do business with suppliers who are committed to protecting and preserving the environment. Suppliers must take actions to track and continuously improve their environmental performance across all of their operations, products, and services.

Michelman expects, and will favor, suppliers who set goals, establish metrics and measure the impact of their operations, products and services on the environment. Michelman recommends that suppliers publicly disclose their ESG metrics and goals (e.g. Ecovadis).

### Environmental Responsibility

Suppliers have a responsibility to ensure that their products and operations meet applicable government or international standards, whichever are more stringent. Suppliers must have systems in place to ensure safe management of waste, air emissions, wastewater discharges and (if any) hazardous materials. Supplier must ensure that the goods that it manufactures (including the inputs and components that it incorporates into its goods), and only use packaging materials that, comply with all applicable environmental laws.

### Environmentally Friendly Processes & Technology

Michelman expects its suppliers to develop, adopt and promote cleaner production processes, pollution prevention technologies, and leakage monitoring technologies.

## SOCIAL

Michelman supports universal human rights. Michelman will choose to partner with suppliers who share its mutual respect for basic human rights.

Michelman utilizes fair employment practices and strives to provide a safe, healthy and productive work environment for its associates. Michelman expects suppliers to also provide for a safe, and productive work environment, specifically:

- **Safe Workplace:** Suppliers will comply with all applicable workplace health and safety laws. Suppliers will provide a safe and healthy workplace for their employees, including appropriate controls, training, work procedures, protection from exposure to hazardous materials and appropriate personal protective equipment. Supplier shall ensure that all facilities meet all applicable building codes and industry design and construction standards and employ appropriate industry standard safety measures.
- **Child Labor and Forced Labor:** Michelman does not use child or forced labor in any of its global operations or facilities, and Michelman expects its suppliers to uphold the same standards.
- **Work Place Discrimination:** Suppliers will not discriminate in any condition of employment on the basis of age, race, color, national origin, sex, sexual orientation, gender identity or expression, physical or mental disability, religion, union membership, military or veteran status, marital or familial status, or any other personal characteristic unrelated to job performance or other factor protected by applicable law.

- **Prevent Harassment and Workplace Abuse:** Suppliers shall treat workers with respect and dignity. Suppliers will ensure that their employees are not subjected to psychological, verbal, sexual or physical harassment, bullying, or any other form of abuse and will comply with all applicable laws on harassment and abuse of employees. Reports of harassment, bullying, and/or abuse will be treated seriously and respectfully. Employees reporting non-compliance with respect to any of these matters should not suffer retaliation and should be provided with transparent, fair and confidential procedures that result in swift, unbiased and fair resolution of difficulties which may arise as part of the process.
- **Wage and Hour Practices:** Michelman pays associates a competitive wage, as benchmarked with other leading companies. Michelman expects its suppliers to comply with all applicable wage and hour laws, and rules and regulations, including minimum wage, overtime and maximum hours. Suppliers shall provide proof of payment to workers in the workers' native language showing hours worked, wage amounts and rates (regular, overtime, and bonus), and deductions and maintain proper documentation of wage payments for their internal records.
- **Freedom of Association and the Right to Collective Bargaining:** Suppliers will respect employees' lawful right of free association, as well as their lawful right to join, form, or not to join a labor union or otherwise engage in collective bargaining.

## GOVERNANCE

Suppliers shall be committed to high standards of ethical conduct when dealing with their workers, their suppliers, and their customers. Bribery, corruption, extortion, and embezzlement, in any form, are strictly prohibited. Suppliers shall not violate the Foreign Corrupt Practices Act (FCPA), any international anti-corruption conventions, or applicable anti-corruption laws and regulations of the countries in which they operate. Suppliers shall not offer or accept bribes, or other means to obtain an undue or improper advantage. Suppliers must uphold fair business standards in advertising, sales, and competition.

**Gifts, Entertainment and Gratuities:** Michelman's policy on gifts, entertainment and gratuities is designed to preserve and maintain the perception and reputation of Michelman as a global business that acts with integrity and bases decisions only on legitimate business considerations. Receiving gifts, entertainment or other gratuities from people with whom Michelman does business is generally not acceptable. Any business entertaining or hospitality will be kept reasonable in nature, entirely for the purpose of maintaining good business relations and not intended to influence in any way Michelman's business decisions. Suppliers are prohibited from offering to any Michelman's employees any gift or invitation of more than modest value, or that may influence any decision, or perception thereof, made by Michelman's employees within the context of their business relationship.

**Conflicts of Interest:** Suppliers must avoid actual, potential or perceived conflicts of interest with Michelman's employees, this also includes offering payments or employment opportunities to Michelman employees. If these occur, the supplier must disclose such a conflict as soon as possible to Michelman so that appropriate steps may be taken.

**Fair Competition:** Suppliers will comply with all applicable laws regarding fair competition and antitrust and shall not engage in any form of money laundering or knowingly accept funds acquired through illicit means. No confidential information in the supplier's possession shall be used to engage in or support insider trading. All business and commercial dealings shall be transparently performed and accurately

recorded in the supplier's books and records.

**Confidential Information:** Suppliers will protect Michelman's confidential information, including personal information, and act to prevent its misuse, theft, fraud or improper disclosure and will comply with all applicable data privacy laws. Suppliers shall safeguard and respect Michelman's intellectual property. Suppliers must take all due care in handling, discussing or transmitting sensitive or confidential information that could affect Michelman, its employees, its customers, the business community or the general public. Any confidential information and/or licensed intellectual property shall only be used for the intended and designated purpose.

## GENERAL

**Corrective Action:** Suppliers shall have a process for timely correction of any deficiencies identified by an internal or external audit, assessment, inspection, investigation, or review.

**Compliance:** Michelman expects its suppliers to comply with all applicable laws of their countries of operation, and the laws of the countries where the service is delivered/performed (including crossing borders).

By accepting this Supplier Code of Conduct and Ethics, supplier acknowledges and confirms that it adheres, and will adhere to, and comply with the principles set out herein for all existing and future business relationships with Michelman, regardless of location and activity.

**Accountability:** Michelman expects its supply chain partners to maintain necessary documentation to demonstrate compliance with the principles stipulated in this Supplier Code of Conduct and Ethics and reserves the right to assess, monitor and audit suppliers' compliance with this Supplier Code of Conduct and Ethics.

## Appendix – Privacy Policy

Updated 1.21.19

### Who are we?

Michelman, Inc. and its affiliates (“Michelman”) are committed to protecting the confidentiality and security of personal information that you choose to provide to us. While it is impossible to guarantee that such information is or will be completely safe from unauthorized access or use, the following policy is intended to inform you of the steps we take to protect the information you choose to provide to us. We recommend that you carefully review this policy before providing us with your personal information. Our business locations and addresses can be found on the contact page of our website at [www.michelman.com](http://www.michelman.com).

### We know your privacy is important to you.

We value your right to privacy and strive to protect your personal data in accordance with applicable data protection legislation and more specifically with the General Data Protection Regulation (“GDPR”) and its national implementing legislation.

In the context of our activities, we collect, hold, disclose and/or otherwise process personal data. Pursuant to applicable data protection and privacy legislation, we qualify as the controller with respect to the personal data that we process.

In this Privacy Policy we set forth how we collect your personal data, how and for what purposes we may use your personal data and to whom your personal data may be disclosed by us. Further, this Privacy Policy includes important information regarding your rights with respect to the processing of your personal data. Therefore, we encourage you to read this Privacy Policy very carefully.

From time to time, we may need to change this Privacy Policy. The most recent version of this Privacy Policy is available on our website at [www.michelman.com](http://www.michelman.com). We encourage you to regularly review this Privacy Policy. You may also ask us to send you a copy of the most recent version of this Privacy Policy.

**Attention:** By using our website and by sharing your personal data with us, you acknowledge that your personal data will be processed in the manner as described in this Privacy Policy.

**Note:** this does not constitute your ‘consent’ to the processing of your personal data. We do not process your personal data on the basis of your consent, unless specifically indicated.

### Whose personal data do we collect?

Michelman may collect personal information from you on our website to facilitate the delivery of services or the fulfillment of an order, to provide you information and samples you request, to give you a customized interactive experience, and to help us develop and notify you about new products and services that meet your needs.

### How do we collect personal data relating to you?

- We may collect information about you in various ways:
- Directly from you when you visit our website at [www.michelman.com](http://www.michelman.com), which may include information you provide to us by means of contact forms on that website; otherwise, for example, when you visit our website at [www.michelman.com](http://www.michelman.com) by means of cookies.

## What personal data do we collect and for what purposes do we use your personal data?

We collect the following information about you and we use it for the following purposes:

Personal data:	Purposes:
your identification and contact information when entered on the contact forms (name, address, telephone number, email address or other contact details)	customer administration
	to deliver the services or products you ordered such as samples you requested
	notification of new products and marketing purposes
your IP address	identification of business partnerships
	to detect website issues

The legal grounds for collecting your identification and contact information for these processing activities are:

Michelman's legitimate interest to collect the information data to provide business services to you and to analyze trends and customer interests as well as to administer the site and your consent to receive marketing information and notifications of new products. We note that you have the right to withdraw that consent at any time. You may do so by clicking on the following link: [www.michelman.com/unsubscribe](http://www.michelman.com/unsubscribe).

### With whom do we share your personal data?

In the context of the purposes as listed above, we may share your personal data with third parties, such as service providers we use (e.g. IT service providers or third parties to fulfill orders). Your personal data can also be disclosed to our affiliated Michelman companies listed on the contact page at [www.michelman.com/Contact/Agents-%26-Distributors](http://www.michelman.com/Contact/Agents-%26-Distributors).

We will ensure that, where relevant, contractual safeguards are implemented to ensure the protection of your personal data when disclosing your personal data to a third party. For example, we will enter into data processing agreements with relevant parties (providing for restrictions on the use of your personal data and obligations with respect to the protection and security of your personal data).

The parties to whom we may disclose your personal data as referred to above may be located in countries outside the European Economic Area (EEA), which countries may offer a lower level of data protection than in the EEA. For example, such shall be the case in the following situations: 1) to fulfil orders by Michelman Inc. or a third party partner, provide notifications and for marketing purposes the data is stored in the United States and 2) for order processing and/or sales support, the data may be sent to a third party partner or an affiliate in India, China

or Singapore.

In such case, it shall be ensured that adequate measures are taken to ensure adequate protection of your personal data in accordance with applicable data protection legislation. More specifically, we will implement the following measures: our European affiliate has the EU Standard Contractual Clauses in agreements in place with all Michelman affiliates in India, China, Singapore, Japan and the United States and with our third party partners.

Your personal data and/or personal profiles shall not be rented or sold to third parties without your prior explicit consent.

### **How long do we store your personal data?**

Your personal data will not be stored for longer than is necessary in relation to the purposes for which we process them (we refer to the purposes as listed above in paragraph 5). Only where we are legally obliged to, or where this is necessary for defending our interests in the context of judicial proceedings (e.g. in case of a dispute), will we store the personal data for longer periods.

More specifically, the following storage periods apply:

<b>Personal data</b>	<b>Storage period</b>
Identification and contact information	2 years
IP Address	2 years

### **How do we protect your personal data?**

Michelman takes the security of personal data very seriously. For this reason, Michelman has implemented digital security procedures including secured data hosting. We implement the necessary administrative, technical and organizational measures for ensuring a level of security appropriate to the specific risks that we have identified. We protect your personal data against destruction, loss, alteration, unauthorized disclosure of or access to personal data transmitted, stored or otherwise processed. More specifically, we have taken the following measures:

- Personal data is stored in commercially reasonably secure operating environments that are not accessible by the public and housed in secure datacenters
- We have implemented a robust password protection requirement
- Direct access to servers is strictly restricted to only crucial employees who have a justified said need and have been properly authorized by senior leadership in IT

Further, we seek to ensure that we keep your personal data accurate and up to date. In view of this, we kindly request you to inform us of any changes to your personal data (such as a change in your contact details which you can do by clicking on [privacy@michelman.com](mailto:privacy@michelman.com) or call us at (513) 793-7766 or use the postal address below.

Michelman, Inc.  
Attention: Privacy  
Request 9080 Shell Road

Cincinnati, OH 45236

If you no longer want to receive information from Michelman just click on the following link: [www.michelman.com/unsubscribe](http://www.michelman.com/unsubscribe).

### What are your rights and how you can exercise them?

You have the right to:

- Information about and access to your personal data
- Rectify your personal data
- Restrict the processing of your personal data
- **Object to the processing of your personal data**
- Receive your personal data in a structured, commonly used and machine readable format and to (have) transmit(ted) your personal data to another organization

To read more about these rights, and circumstances under which you can use these rights, in particular your **right to object**, please click here: [www.michelman.com/privacy-policy/annex](http://www.michelman.com/privacy-policy/annex).

Finally, you have the right to lodge a complaint in Belgium, la Commission Vie Privée or Privacycommissie ; in Luxembourg, Commission Nationale pour la Protection des Données or Nationale Kommission für den Datenschutz; in the Netherlands, Autoriteit Persoonsgegevens; in France, la Commission nationale de l'informatique et des libertés; in Germany Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein- Westfalen.

### Use of cookies

We use certain cookies on our website as they are essential to make our website work. We use cookies to collect usage activity in the aggregate.

Cookies are small pieces of data that are stored on your computer or mobile device via your browser. On our website, we use the following cookies:

Name of the cookie	Type of cookie	Purpose of the cookie	Storage period
SessionTracker_s_userprefs	Necessary/Technical Cookie	To maintain a logged in state for website administrators	2 hours
_ga	Analytical cookies	Used to distinguish users	2 years
_gid	Analytical cookies	Used to distinguish users	24 hours
_gat	Analytical cookies	Used to throttle request rate.	1 minute
AMP_TOKEN	Analytical cookies	Contains a token that can be used to retrieve a Client ID from AMP Client ID service. Other possible values indicate opt-out, inflight request or an error	30 seconds to 1 year

retrieving a Client ID service.

_gac_(property-id)	Analytical cookies	Contains campaign related information for the user.	90 days
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### How can you manage / delete these cookies?

All major internet browsers offer the option to manage the cookies that were installed on your computer or mobile device.

In case you do not wish for this website to place cookies on your computer / mobile device, you may limit or delete these easily by adjusting your mobile or browser settings. In addition, you can set your mobile or browser settings in such a way that you get a notification every time you receive a cookie on your computer or mobile device, so that you can decide whether you wish to accept this cookie or not.

### Contact

If you have any questions, comments or complaints in relation to this Privacy Policy or the processing of your personal data by us, please feel free to contact us by clicking on [privacy@michelman.com](mailto:privacy@michelman.com) or call us at (513) 793- 7766 or use the postal address below.

Michelman, Inc.  
Attention: Privacy  
Request 9080 Shell Road  
Cincinnati, OH 45236



## Appendix – Non-Discrimination and Harassment Policy

Updated 12.31.23

The Company does not tolerate and prohibits discrimination or harassment of or against our job applicants, contractors, interns, volunteers, or employees by another employee, supervisor, vendor, customer, or any third party on the basis of actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth, related medical conditions and lactation), gender identity or gender expression (including transgender status), sexual orientation, marital status, military service and veteran status, disability, protected medical condition as defined by applicable state or local law, genetic information, or any other characteristic protected by applicable federal, state, or local laws and ordinances (referred to as “protected characteristics”). The Company also prohibits retaliation as defined below.

The Company is committed to a workplace free of discrimination, harassment and retaliation. These behaviors are unacceptable in the workplace and in any work-related settings such as remote work settings, business trips and Company sponsored social functions, regardless of whether the conduct is engaged in by a supervisor, co-worker, client, customer, vendor or other third party. In addition to being a violation of this policy, discrimination, harassment or retaliation based on any protected characteristic as defined by applicable federal, state, or local laws and ordinances also is unlawful. For example, sexual harassment and retaliation against an individual because the individual filed a complaint of sexual harassment or because an individual aided, assisted or testified in an investigation or proceeding involving a complaint of sexual harassment as defined by applicable federal, state, or local laws and ordinances are unlawful.

### **Discrimination Defined**

Discrimination under this policy generally means treating differently or denying or granting a benefit to an individual because of the individual’s actual or perceived protected characteristic.

### **Harassment Defined**

Harassment generally is defined in this policy as unwelcome verbal, visual or physical conduct that denigrates or shows hostility or aversion towards an individual based on or because of any actual or perceived protected characteristic or has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile or offensive working environment.

Harassment can be verbal (including slurs, jokes, insults, epithets, gestures or teasing), visual (including offensive posters, symbols, cartoons, drawings, computer displays, text messages, social media posts or e-mails) or physical conduct (including physically threatening another, blocking someone’s way, etc.). Such conduct violates this policy, even if it does not rise to the level of a violation of applicable federal, state, or local laws and ordinances. Because it is difficult to define unlawful harassment, employees are expected to behave at all times in a manner consistent with the intended purpose of this policy.

## **Sexual Harassment Defined**

Sexual harassment includes harassment on the basis of sex or gender (including pregnancy, childbirth, related medical conditions and lactation), gender identity or gender expression (including transgender status), and/or sexual orientation. Sexual harassment includes unwelcome conduct, such as unwelcome or unsolicited sexual advances, requests for sexual favors, and other verbal, visual or physical conduct of a sexual nature or which is directed at an individual because of that individual's sex or gender (including pregnancy, childbirth, related medical conditions and lactation), gender identity or gender expression (including transgender status), and/or sexual orientation when:

- Submission to that conduct or those advances or requests is made either explicitly or implicitly a term or condition of an individual's employment; or
- Submission to or rejection of the conduct or advances or requests by an individual is used as the basis for employment decisions affecting the individual; or
- The conduct or advances or requests have the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Examples of conduct that violates this policy include:

- unwelcome flirtations, leering, whistling, touching, pinching, assault, brushing up against someone's body, blocking normal movement
- requests for sexual favors or demands for sexual favors in exchange for favorable treatment
- obscene or vulgar gestures, posters, or comments
- sexual jokes or comments about a person's body, sexual prowess, or sexual deficiencies
- propositions, or suggestive or insulting comments of a sexual nature
- derogatory cartoons, posters, and drawings
- sexually-explicit e-mails or voicemails
- uninvited touching of a sexual nature
- unwelcome sexually-related comments
- comments, inquiries, or gossip about one's own or someone else's sex life or sexual activities
- conduct or comments consistently targeted at only one gender, even if the content is not sexual
- teasing or other conduct directed toward a person because of the person's gender

## **Retaliation Defined**

Retaliation means adverse conduct taken because an individual reported an actual or perceived violation of this policy, opposed practices prohibited by this policy, or participated in the reporting and investigation process described below. "Adverse conduct" includes but is not limited to: any action that would discourage or keep an individual from reporting discrimination, harassment or retaliation; shunning and avoiding an individual who reports discrimination, harassment or retaliation; express or implied threats or intimidation intended to prevent an individual from reporting discrimination, harassment or retaliation; and denying employment benefits because an applicant or employee reported discrimination,

harassment or retaliation or participated in the reporting and investigation of discrimination, harassment or retaliation.

## **Reporting Procedures**

The following steps have been put into place to ensure the work environment at the Company is free of discrimination, harassment and retaliation. If an employee believes someone has violated this policy, the employee should promptly bring the matter to the immediate attention of your local Human Resources Business Partner, or Jason Wise, Chief Financial & Risk Officer. Jason Wise can be reached at +1 513-739-9280, or [jasonwise@michelman.com](mailto:jasonwise@michelman.com). If either of these individuals is the person toward whom the complaint is directed you should contact any higher-level manager in your reporting chain. Written complaints can be submitted internally using the form provided with this policy. Use of this written complaint form is not required. For anyone who would rather make a complaint verbally, or by email, these complaints will be treated with equal priority. A verbal or otherwise written complaint (such as an email) on behalf of oneself or another employee is also acceptable. If the employee makes a complaint under this policy and has not received an initial response within five (5) business days, the employee should contact Rick Michelman, Chief Executive Officer, immediately.

Every supervisor or manager who learns of any employee's concern about conduct in violation of this policy, whether in a formal complaint or informally, or who otherwise is aware of conduct in violation of this policy must immediately report the issues raised or conduct to his or her local Human Resources Business Partner, or Chief Financial & Risk Officer.

## **Investigation Procedures**

Upon receiving a complaint, the Company will promptly conduct a fair and thorough investigation into the facts and circumstances of any claim of a violation of this policy that is fair for all parties. To the extent possible, the Company will endeavor to keep the reporting employee's concerns confidential. However, complete confidentiality may not be possible in all circumstances. Employees are required to cooperate in all investigations conducted pursuant to this policy.

During the investigation, the Company generally will interview the complainant and the accused, conduct further interviews as necessary and review any relevant documents or other information. Those receiving claims and leading investigations will handle complaints and questions with sensitivity toward those participating.

Upon completion of the investigation, the Company will determine whether this policy has been violated based upon its reasonable evaluation of the information gathered during the investigation. The Company will inform the complainant and the accused of the results of the investigation.

In the event the Company determines that a violation of this policy has occurred, the Company will take steps to ensure a safe work environment for the individuals who experienced the complained-of conduct. The Company will take corrective measures against any person who it finds to have engaged in conduct in violation of this policy, if the Company determines such measures are necessary. These measures may include, but are not limited

to, counseling, suspension, or immediate termination. Anyone, regardless of position or title, whom the Company determines has engaged in conduct that violates this policy will be subject to discipline, up to and including termination. This includes individuals engaging in discrimination, harassment or retaliation, as well as supervisors or managers who fail to report violations of this policy, or knowingly allow prohibited conduct to continue. Individuals who engage in conduct that rises to the level of a violation of law can be held personally liable for such conduct.

\* \* \* \*

Remember, we cannot remedy claimed discrimination, harassment or retaliation unless you bring these claims to the attention of management. Please report any conduct which you believe violates this policy.

# CALIFORNIA SUPPLEMENT

## DISCRIMINATION, HARASSMENT, AND RETALIATION PREVENTION (ADDENDUM TO DISCRIMINATION, HARASSMENT, AND RETALIATION PREVENTION POLICY)

In addition to those protected characteristics covered by the general policy, protected characteristics also include reproductive health decision making.

### **Training**

All employees of the Company are required to undergo harassment prevention training as required by applicable law. For more information on this training requirement, employees can visit <https://calcivilrights.ca.gov/shpt/>

# CONNECTICUT SUPPLEMENT

## SEXUAL HARASSMENT (ADDENDUM TO DISCRIMINATION, HARASSMENT & RETALIATION PREVENTION POLICY)

Sexual harassment is illegal and prohibited by Connecticut and federal law in the workplace, pursuant to § 46a-60(a)(8) of the Connecticut General Statutes and Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e *et seq.*

While employees are encouraged to report claims internally, if an employee believes that they have been subjected to sexual harassment, the employee may file a formal complaint with the Connecticut Commission on Human Rights and Opportunities (the "Commission") at 860-541-3400, CT Toll Free 1-800-477-5737, or online at [www.ct.gov/CHRO](http://www.ct.gov/CHRO).

Individuals who engage in acts of sexual harassment may be subject to civil penalties in the form of a cease and desist orders, back pay, compensatory damages, hiring, promotion or reinstatement, emotional distress, as well as attorney's fees, costs, pre- and post- judgment interest and punitive damages (if the case is tried in court). Individuals may also be subject to additional criminal penalties stemming from acts of sexual harassment.

Connecticut law requires that a written complaint be filed with the Commission within 300 days of the date the alleged harassment.

## ILLINOIS SUPPLEMENT

### DISCRIMINATION AND SEXUAL HARASSMENT (ADDENDUM TO EQUAL EMPLOYMENT OPPORTUNITY & DISCRIMINATION, HARASSMENT & RETALIATION PREVENTION POLICIES) (FOR EMPLOYEES OUTSIDE CHICAGO)

In compliance with the Illinois Human Rights Act ("Act"), all employees have the right to be free from unlawful discrimination or sexual harassment. This means that employers may not treat people differently based on race, age, gender, pregnancy, disability, sexual orientation or any other protected class named in the Act. This applies to all employer actions, including hiring, promotion, discipline and discharge.

Employees also have the right to reasonable workplace accommodations based on pregnancy and disability. This means employees can ask for reasonable changes to their job if needed because they are pregnant or disabled.

It is also unlawful for employers to treat people differently or otherwise retaliate against an employee because they have reported discrimination or sexual harassment, participated in an investigation, or helped others exercise their right to complain about discrimination or sexual harassment.

Aside from the internal complaint process at the Company, employees may choose to file a charge of discrimination or sexual harassment under the Act with the Illinois Department of Human Rights ("IDHR"). The charge process for violations of the law can be initiated by completing the form at [www.illinois.gov/dhr](http://www.illinois.gov/dhr) or by contacting the IDHR at [IDHR.Intake@illinois.gov](mailto:IDHR.Intake@illinois.gov), or either of these offices:

Chicago Office  
555 West Monroe St., 7th Floor  
Chicago, IL 60661  
(312) 814-6200  
(866) 740-3953 (TTY)  
(312) 814-6251 (Fax)

Springfield Office  
535 W. Jefferson Street, 1<sup>st</sup> Floor  
Springfield, IL 62702  
(217) 785-5100  
(866) 740-3953 (TTY)  
(217) 785-5106 (Fax)

Employees also can contact the Illinois Sexual Harassment and Discrimination Helpline at 1-877-236-7703.

**DISCRIMINATION AND SEXUAL HARASSMENT (ADDENDUM TO EQUAL EMPLOYMENT OPPORTUNITY & DISCRIMINATION, HARASSMENT & RETALIATION PREVENTION POLICIES)**

In compliance with the Illinois Human Rights Act ("Act") and the City of Chicago Human Rights Ordinance ("Ordinance"), all employees have the right to be free from unlawful discrimination or sexual harassment. This means that employers may not treat people differently based on race, age, gender, pregnancy, disability, sexual orientation or any other protected class named in the Act or Ordinance. This applies to all employer actions, including hiring, promotion, discipline and discharge. Sexual harassment is illegal and the Company expressly prohibits such actions and behavior.

Sexual harassment means any (i) unwelcome sexual advances or any unwelcome conduct of a sexual nature; or (ii) requests for sexual favors or conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or (3) such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment; or (iii) sexual misconduct, which means any behavior of a sexual nature which also involves coercion, abuse of authority, or misuse of an individual's employment position.

Employees can confidentially report allegations of sexual harassment internally using the reporting procedures set forth in the general Discrimination, Harassment & Retaliation Prevention policy. Written complaints can be submitted internally using the form provided with this policy.

Employees also have the right to reasonable workplace accommodations based on pregnancy and disability. This means employees can ask for reasonable changes to their job if needed because they are pregnant or disabled.

It is also unlawful for employers to treat people differently or otherwise retaliate against an employee because they have reported discrimination or sexual harassment, participated in an investigation, or helped others exercise their right to complain about discrimination or sexual harassment.

Aside from the internal complaint process at the Company, employees may choose to file a charge/complaint of discrimination or sexual harassment with the government agency or agencies set forth below.

**Illinois Department of Human Rights ("IDHR")**

The charge process for violations of the law can be initiated by completing the form at [www.illinois.gov/dhr](http://www.illinois.gov/dhr) or by contacting the IDHR at [IDHR.Intake@illinois.gov](mailto:IDHR.Intake@illinois.gov), or either of these offices:

Chicago Office  
555 W. Monroe St., 7th Floor  
Chicago, IL 60661  
(312) 814-6200  
(866) 740-3953 (TTY)  
(312) 814-6251 (Fax)

Springfield Office  
535 W. Jefferson Street, 1<sup>st</sup> Floor  
Springfield, IL 62702  
(217) 785-5100  
(866) 740-3953 (TTY)  
(217) 785-5106 (Fax)

Employees also can contact the Illinois Sexual Harassment and Discrimination Helpline at 1-877-236-7703.



**Chicago Commission on Human Relations ("CCHR")**

The complaint process for violations of the law can be initiated by visiting [www.chicago.gov/CCHR](http://www.chicago.gov/CCHR) or by contacting the CCHR at [cchr@cityofchicago.org](mailto:cchr@cityofchicago.org), or at:

740 N. Sedgwick Suite 400  
Chicago, IL 60654  
(312) 744-4111 (312)  
744-1088 (TTY)  
(312) 744-1081 (FAX)

Additionally, employees may choose to file a charge of discrimination or sexual harassment with the United States Equal Employment Opportunity Commission (EEOC) by contacting the EEOC at:

JCK Federal Building  
230 S Dearborn Street  
Chicago, IL 60604  
Filing of Private Sector Charges/Enforcement/Federal Sector Hearings: Suite 1866  
Mediation Unit/Legal Unit: Suite 2920  
1-800-669-4000  
312-588-1260 (Fax)

Employees, other than those who supervise or manage employees, are required to participate in a minimum of one hour of sexual harassment prevention training at least once a year in accordance with the Act/Ordinance. Anyone who supervises or manages employees is required to participate in a minimum of two hours of sexual harassment prevention training at least once a year in accordance with the Act/Ordinance. Additionally, all employees are required to participate in one hour of bystander training at least once a year in accordance with the Ordinance.

# MAINE SUPPLEMENT

## SEXUAL HARASSMENT (ADDENDUM TO DISCRIMINATION, HARASSMENT & RETALIATION PREVENTION POLICY)

While employees are encouraged to report claims internally, if an employee believes that the employee has been subjected to sexual harassment, the employee may file a formal complaint with the government agency or agencies set forth below. Accordingly, using the Company's complaint process does not prohibit an employee from filing a complaint with this agency:

### **Maine Human Rights Commission**

51 State House Station  
Augusta, ME 04333-0051  
PHONE: 207-624-6050  
TTY/TTD: 207-624-6064  
FAX: 207-624-6063

Employees may file a complaint with the Maine Human Rights Commission within 300 days of the date of alleged sexual harassment.

# MASSACHUSETTS SUPPLEMENT

## SEXUAL HARASSMENT (ADDENDUM TO DISCRIMINATION, HARASSMENT & RETALIATION PREVENTION POLICY)

While employees are encouraged to report claims internally, if an employee believes that they have been subjected to sexual harassment, the employee may file a formal complaint with the government agency or agencies set forth below. Accordingly, using the Company's complaint process does not prohibit an employee from filing a complaint with these agencies. The name, address, and telephone numbers of the state and federal enforcing agencies for our Massachusetts-based employees are as follows:

### **Massachusetts Commission Against Discrimination (MCAD)**

One Ashburton Place  
Room 601  
Boston, MA 02108  
(617) 994-6000

Denholm Building  
484 Main Street, Room 320  
Worcester, MA 01608  
(508) 453-9630

436 Dwight Street  
Room 220  
Springfield, MA 01103  
(413) 739-2145

### **(Federal) Equal Employment Opportunity Commission (EEOC)**

John F. Kennedy Federal Building  
15 New Sudbury Street, Room 475  
Boston, MA 02203  
(800) 669-4000 or (800) 669-6820 TTY  
[info@eeoc.gov](mailto:info@eeoc.gov)

# NEW YORK SUPPLEMENT

## SEXUAL HARASSMENT (ADDENDUM TO DISCRIMINATION, HARASSMENT & RETALIATION PREVENTION POLICY)

The Company does not tolerate and prohibits sexual harassment of or against our employees, applicants, and interns by another employee, supervisor, vendor, customer, or any third party. The policy also protects contractors, subcontractors, vendors, consultants, or anyone else providing services in our workplace. These individuals include persons commonly referred to as independent contractors, gig workers, and temporary workers. Also included are persons providing equipment repair, cleaning services, or any other services through a contract with the Company.

### **Bystander Intervention**

Any employee witnessing harassment as a bystander is encouraged to report it. There are five standard methods of bystander intervention that can be used when anyone witnesses harassment or discrimination and wants to help.

1. A bystander can interrupt the harassment by engaging with the individual being harassed and distracting them from the harassing behavior;
2. A bystander who feels unsafe interrupting on their own can ask a third party to help intervene in the harassment;
3. A bystander can record or take notes on the harassment incident to benefit a future investigation;
4. A bystander might check in with the person who has been harassed after the incident, see how they are feeling and let them know the behavior was not ok; and
5. If a bystander feels safe, they can confront the harassers and name the behavior as inappropriate. When confronting harassment, physically assaulting an individual is never an appropriate response.

Though not exhaustive, and dependent on the circumstances, the guidelines above can serve as a brief guide of how to react when witnessing harassment in the workplace. Any employee witnessing harassment as a bystander is encouraged to report it. A supervisor or manager that is a bystander to harassment is required to report it.

Written complaints can be submitted internally using the form provided with this policy. Use of this written complaint form is not required. For anyone who would rather make a complaint verbally, or by email, these complaints will be treated with equal priority. A verbal or otherwise written complaint (such as an email) on behalf of oneself or another employee is also acceptable.

### **Legal Protections and External Remedies**

An employee or covered individual who prefers not to report harassment to their manager or employer may choose to pursue external legal remedies. Complaints may be made to both the employer and a government agency. Aside from the internal complaint process at the Company, employees may choose to pursue external legal remedies with the following governmental entities based on the noted federal, state and local protections.

#### **State Human Rights Law (HRL)**

The Human Rights Law (HRL), codified as N.Y. Executive Law, art. 15, § 290 et seq., applies to all employers in New York State with regard to sexual harassment, and protects employees, paid or unpaid interns and non-employees, regardless of immigration status. A complaint alleging violation of

the Human Rights Law may be filed either with the Division of Human Rights (DHR) or in New York State Supreme Court. Complaints of sexual harassment may be filed in either forum any time within three years from the time of the incident(s) that give rise to the claim. An individual may not file with DHR if they have already filed a HRL complaint in state court.

Complaining internally to the Company does not extend your time to file with DHR or in court. The three years is counted from date of the most recent incident of harassment.

You do not need an attorney to file a complaint with DHR, and there is no cost to file with DHR.

DHR will investigate your complaint and determine whether there is probable cause to believe that sexual harassment has occurred. Probable cause cases are forwarded to a public hearing before an administrative law judge. If sexual harassment is found after a hearing, DHR has the power to award relief, which varies but may include requiring your employer to take action to stop the harassment, or redress the damage caused, including paying of monetary damages, attorney's fees, punitive damages, and civil fines.

The New York State Division of Human Rights has established a toll-free confidential hotline to provide counsel and assistance to individuals who believe they are experiencing workplace sexual harassment. Employees can call the toll-free sexual harassment hotline at 1-800-HARASS-3 Monday through Friday, 9:00 AM to 5:00 PM.

DHR's main office contact information is: NYS Division of Human Rights, One Fordham Plaza, Fourth Floor, Bronx, New York 10458. You may call (718) 741-8400 or visit: [www.dhr.ny.gov](http://www.dhr.ny.gov).

Contact DHR at (888) 392-3644 or visit [dhr.ny.gov/complaint](http://dhr.ny.gov/complaint) for more information about filing a complaint. The website has a digital complaint process that can be completed on your computer or mobile device from start to finish. The website also has a complaint form that can be downloaded, filled out, and mailed to DHR. The website also contains contact information for DHR's regional offices across New York State.

### **Civil Rights Act of 1964**

The United States Equal Employment Opportunity Commission (EEOC) enforces federal anti-discrimination laws, including Title VII of the 1964 federal Civil Rights Act (codified as 42 U.S.C. § 2000e et seq.). An individual can file a complaint with the EEOC anytime within 300 days from the harassment. There is no cost to file a complaint with the EEOC. The EEOC will investigate the complaint, and determine whether there is reasonable cause to believe that discrimination has occurred. If the EEOC determines that the law may have been violated, the EEOC will try to reach a voluntary settlement with the employer. If the EEOC cannot reach a settlement, the EEOC (or the Department of Justice in certain cases) will decide whether to file a lawsuit. The EEOC will issue a Right to Sue letter permitting the individual to file a complaint in federal court if the EEOC closes the charge, is unable to determine if federal employment discrimination laws may have been violated, or believes that unlawful discrimination occurred by does not file a lawsuit.

The EEOC does not hold hearings or award relief, but may take other action including pursuing cases in federal court on behalf of complaining parties. Federal courts may award remedies if discrimination is found to have occurred. In general, private employers must have at least 15 employees to come within the jurisdiction of the EEOC.

An employee alleging discrimination at work can file a "Charge of Discrimination." The EEOC has district, area, and field offices where complaints can be filed. Contact the EEOC by calling 1-800-669-

4000 (TTY: 1-800-669-6820), visiting their website at [www.eeoc.gov](http://www.eeoc.gov) or via email at [info@eeoc.gov](mailto:info@eeoc.gov).

If an individual filed an administrative complaint with DHR, DHR will file the complaint with the EEOC to preserve the right to proceed in federal court.

### **Local Protections**

Many localities enforce laws protecting individuals from sexual harassment and discrimination. An individual should contact the county, city or town in which they work to find out if such a law exists. For example, employees who work in New York City may file complaints of sexual harassment with the New York City Commission on Human Rights. Contact their main office at Law Enforcement Bureau of the NYC Commission on Human Rights, 22 Reade Street, 3rd Floor, New York, New York 10007; call 311 or (212) 306-7450; or visit [www.nyc.gov/html/cchr/html/home/home.shtml](http://www.nyc.gov/html/cchr/html/home/home.shtml).

### **Contact the Local Police Department**

If the harassment involves unwanted physical touching, coerced physical confinement or coerced sex acts, the conduct may constitute a crime. Contact the local police department if you wish to pursue criminal charges.

# OREGON SUPPLEMENT

## **DISCRIMINATION AND HARASSMENT (ADDENDUM TO DISCRIMINATION, HARASSMENT & RETALIATION PREVENTION POLICY)**

While employees are encouraged to report claims internally, if an employee believes that they have been subjected to discrimination or harassment (including conduct that constitutes sexual assault), the employee may file a formal complaint with the Equal Employment Opportunity Commission, the Oregon Bureau of Labor and Industries, or in a court of law. A claim alleging discrimination or harassment (including conduct that constitutes sexual assault) prohibited by Oregon law, must be filed no later than five years after the occurrence of the alleged conduct.

Under Oregon law, employers may not require or coerce an employee to enter into a nondisclosure or non-disparagement agreement that has the purpose or effect of preventing an employee from disclosing or discussing conduct that constitutes unlawful discrimination or harassment (including conduct that constitutes sexual assault) that occurred between employees in the workplace or at a work-related event, or between employees and the employer at or away from the workplace. Any employee claiming to be the victim of discrimination or harassment (including conduct that constitutes sexual assault) may voluntarily request to enter into a nondisclosure or non-disparagement agreement. Any employee who voluntarily enters into a nondisclosure or non-disparagement agreement shall have seven days to revoke the agreement.

Employers and employees are advised to document any incidents involving discrimination or harassment (including conduct that constitutes sexual assault) as defined by Oregon law.

# RHODE ISLAND SUPPLEMENT

## SEXUAL HARASSMENT (ADDENDUM TO DISCRIMINATION, HARASSMENT & RETALIATION PREVENTION POLICY)

While employees are encouraged to report claims internally, if an employee believes that they have been subjected to sexual harassment, the employee may file a formal complaint with the government agency or agencies set forth below. Accordingly, using the Company's complaint process does not prohibit an employee from filing a complaint with these agencies.

### **Rhode Island Commission for Human Rights**

180 Westminster Street, 3<sup>rd</sup> Floor  
Providence, RI 02903-1918  
(401) 222-2661

### **(Federal) Equal Employment Opportunity Commission (EEOC)**

JFK Federal Building  
15 New Sudbury Street, Room 475  
Boston, MA 02203  
(617) 565-3200 (voice)



# VERMONT SUPPLEMENT

## SEXUAL HARASSMENT (ADDENDUM TO DISCRIMINATION, HARASSMENT & RETALIATION PREVENTION POLICY)

While employees are encouraged to report claims internally, if an employee believes that they have been subjected to sexual harassment, the employee may file a formal complaint with the government agency or agencies set forth below. Accordingly, using the Company's complaint process does not prohibit an employee from filing a complaint with these agencies:

**Vermont Attorney General's Office**

Civil Rights Unit, 109 State Street  
Montpelier, VT 05609  
(802) 828-3657 (voice/TDD)

**(Federal) Equal Employment Opportunity  
Commission (EEOC)**

JFK Federal Building  
15 New Sudbury Street, Room 475  
Boston, MA 02203  
(617) 565-3200 (voice)

Employees may file a complaint with the agencies noted above within 300 days of the date of alleged sexual harassment.

## DISCRIMINATION, HARASSMENT & RETALIATION COMPLAINT FORM

If you believe that you have been subjected to conduct in violation of the Company's Discrimination, Harassment & Retaliation Prevention Policy, including any applicable state supplement, you are encouraged to complete this form and submit it to Human Resources. If you are more comfortable reporting verbally or in another manner, you may do so and can follow the guidelines set forth in the Company policy. You will not be retaliated against for filing a complaint. Once a complaint is received, the Company will follow the investigation process described in our policy.

### General Information

Your Name / Job Title:

Your Department / Supervisor:

Preferred Communication Method (if via e-mail or phone, please provide contact info):

### Complaint Information

Please tell us who you believe has violated our Discrimination, Harassment & Retaliation Prevention Policy. What is their relationship to you (e.g., Supervisor, Subordinate, Co-Worker, Other):

Please describe what happened and how it is affecting you and your work. Please use additional sheets of paper if necessary and attach any relevant documents or evidence.

Please provide specific date(s) the alleged misconduct occurred. Additionally, please advise if the alleged misconduct is continuing?

Please list the name and contact information of any witnesses or individuals who may have information related to your complaint.

*This last question is optional, but may help the investigation*

Have you previously complained or provided information (verbal or written) about related incidents? If yes, when and to whom did you complain or provide information?

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

## Appendix – Non-Discrimination and Harassment Policy (for Belgium-based associates only)

Updated 12.31.23

Michelman has an Equal Employment Opportunity Policy which requires all employment and advancement decisions to be made without regard to gender (including pregnancy, medically assisted reproduction, childbirth and related medical conditions, lactation and breastfeeding, motherhood, family responsibilities, gender identity, gender expression, gender characteristics and medical and social transition), race, religion or belief, color, creed, national origin, age, health status, disability, social ancestry or situation, language, sexual orientation, gender identity or expression, physical characteristics or genetic information, military or veteran status, marital status (including civil union/domestic partner), political beliefs, trade union affiliation or any other classification, characteristics or factors protected by applicable laws.

In implementing that Policy, Michelman will not tolerate discrimination or harassment of any form directed toward fellow associates, customers or persons providing services to or with Michelman on the basis of the above-mentioned characteristics or any other classification, characteristics or factors protected by applicable laws. Any conduct in violation of this policy will result in discipline, up to and including termination of employment.

Michelman condemns and prohibits harassment of any associate, customer, client or person performing services to or with Michelman, whether or not it arises to the level of illegal harassment under applicable law.

This policy applies to all associates of the Company. Associates who feel they have been discriminated against in violation of this Policy should report their complaint in accordance with the procedures set forth in this Policy.

Michelman has a section in its work regulations which defines forms of harassment in accordance with Belgian law and also the procedures that employees can follow in cases of harassments.

### **REPORTING COMPLAINTS**

Michelman expects that everyone will act in accordance with this Policy. If feasible, the associate should firmly and clearly tell the person engaging in the conduct that it is unwelcome, offensive and should stop at once.

Appropriate disciplinary action, up to and including termination, will be promptly taken against any associate engaging in violation of this Policy, even in cases where applicable laws may not have been violated.

If an associate feels that his or her complaint has not been or cannot be properly handled, the associate may address the complaint to our Chief Financial and Risk Officer or the President and CEO.

### **NO RETALIATION**

Belgian law contains provisions to protect any associate against retaliation.

## **APPLICABILITY TO E-MAIL, TEXT MESSAGES & SOCIAL MEDIA**

Associates should expect Michelman to enforce this Policy not only in the context of spoken and/or physical interactions, but also in the context of e-mails, text messages, and information posted, created or exchanged on social media, to the extent permitted by law.

“Social media” includes all means of communicating or posting information or content of any sort on the Internet, including to an associate’s own or someone else’s weblog or blog, journal or diary, personal web site, social networking web site, web bulletin board or a chat room, whether or not associated or affiliated with Michelman, as well as any other form of electronic communication.

Nothing contained in this Policy restricts an associate’s right to engage in protected concerted activity under applicable law.

## **POLICY ADMINISTRATION**

The Human Resources Department is responsible for the administration of this Policy. Questions regarding this Policy or, questions about discrimination and/or harassment that are not addressed in this Policy should be directed to an associate’s manager or Human Resources Business Partner.

# Appendix – Equal Employment Opportunity for Persons with Disabilities Policy (for India-based associates only)

Updated 12.31.23

## OVERVIEW

Michelman is an equal opportunity employer and is committed to maintaining a workplace in which associates treat one another with consideration, dignity, inclusion, and respect.

Michelman hires qualified candidates and maintains an atmosphere free from illegal discrimination or harassment of any kind, whether by associates, managers, customers, suppliers, vendors, business partners, or other third parties, including discrimination or harassment on the basis of an individual's age, race, color, religion (or religious creed), sex/gender (including pregnancy, childbirth or related medical conditions), gender expression or identity, sexual orientation, marital status (including civil union/domestic partner), disability, medical condition, national origin, citizenship, ancestry, military or veteran status, genetic information or any other classification, characteristics or factors protected by applicable laws.

Michelman is committed to complying with the Rights of Persons with Disabilities Act, 2016 ("**RPWD Act**") and the Rights of Persons with Disabilities Rules, 2017 ("**RPWD Rules**") and has formulated this policy in light of the same. In the event of any conflict between this policy and the applicable laws, the provisions of the applicable laws, including but not limited to the RPWD Act and the RPWD Rules, shall prevail.

## SCOPE AND APPLICABILITY

This policy applies to all Associates (*defined below*) of Michelman who can be classified as Persons with Disability / PWD (*defined below*). To further clarify, this policy will also cover: (a) persons who apply for any of the Identified Posts (*defined below*), and (b) Associates who acquire any disability in the course of their employment with Michelman.

This policy describes the posts that are identified for PWDs at Michelman (the "**Identified Posts**") along with the requisite qualifications, how the selection process takes place, what kind of training and support would be provided, and specifies a grievance redressal mechanism for addressing any complaints made by Associates who are PWDs.

## DEFINITIONS

- "**Associate**" refers to all employees who are working for Michelman, including all permanent and temporary employees, employees under a fixed term contract and probationers;
- "**Discrimination**" means any distinction, exclusion, restriction based on a person's disability whose purpose or effect is to impair or nullify the recognition, enjoyment, or exercise on an equal basis with others, all human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field and includes all forms of discrimination and denial of Reasonable Accommodation. Provided that a particular action or omission will not be considered discrimination if it is a proportionate means of achieving a legitimate aim;

- **“Person with Disability/PWD”** means a person with long term physical, mental, intellectual or sensory impairment which, in interaction with Barriers, hinders full and effective participation in society equally with others;
- **“Barrier”** means any factor including communicational, cultural, economic, environmental, institutional, political, social, attitudinal or structural factors which hampers the full and effective participation of PWDs in society;
- **“Reasonable Accommodation”** means necessary and appropriate modification and adjustments, without imposing a disproportionate or undue burden in a particular case, to ensure to PWDs the enjoyment or exercise of rights equally with others.

## **EQUAL OPPORTUNITY AND NON-DISCRIMINATION**

Michelman aims to provide equal opportunity to PWDs considered for employment in positions where they could be employed. Michelman will also provide them with necessary facilities and amenities so they can effectively perform their duties.

## **IDENTIFICATION OF POSITIONS AND MANNER OF SELECTION**

The jobs for which PWDs could be considered will be identified by the Vice President & Managing Director for India and the Global Human Resources Manager. The list of positions that may be identified as suitable will be notified on the official website of Michelman <https://www.michelman.in/> and to the statutory authorities as mentioned in the RPWD Act and RPWD Rules.

The persons being considered for these Identified Posts will be notified of the recruitment and selection process as well as other associated rules of employment. The Identified Posts so notified should not be construed as reservations, however, Michelman will give first preference to PWD candidates for these Identified Posts. Michelman will always ensure that there is no Discrimination in respect of appointment, salaries, training, evaluations, promotions and general career progression. Michelman encourages candidates with different disabilities to apply.

If an Associate acquires a disability during their employment tenure, owing to which they are unable to effectively perform their current duties, Michelman will invest in re-skilling the Associate for another position. Michelman will undertake best efforts to ensure that no Associate is terminated from services, purely on account of having acquired a disability in the course of employment.

Further, Michelman will ensure that: (a) its facilities, technologies, privileges and benefits are made accessible to all Associates who are PWDs; (b) PWDs do not suffer any form of bullying or harassment while employed at Michelman, and (c) Reasonable Accommodation is provided to all PWDs appointed to any of the Identified Posts. At all times, the PWDs are encouraged to speak to the Liaison Officer/ the Human Resource Department.

## **MANNER OF SELECTION**

Michelman’s talent acquisition process is based on qualifications and merit, without any bias to the disabilities of prospective candidates. The candidates with disabilities shall be considered for the Identified Posts. In case such candidates are not found suitable or no such candidate is available, Michelman will recruit the candidates without disability in those positions.

### *Post Recruitment and Pre-Promotion Training*

Michelman will provide necessary post-recruitment and pre-promotion training to the Persons with Disabilities to enable them to carry out their jobs effectively. Where such training is required, Michelman will ensure that it is in an accessible format. The duration and training contents, its types and methods shall be determined by the Human Resources Department in consultation with the medical personnel of Michelman. If any PWD requires any specific assistance, they are requested to approach the Liaison Officer/Human Resource Department.

### *Transfer and Posting*

Michelman will ensure that if a PWD Associate transfers departments or locations, they will be afforded a position suitable to their professional background, skill-set or capabilities.

## **OTHER FACILITIES**

### **Performance Evaluation**

For evaluation of the performance of Associates who are PWDs, Michelman will prescribe objective evaluation criteria, considering any Reasonable Accommodation provided.

### **Assistive Devices**

Michelman will provide tools to aid the Associates who are PWDs so they can perform their duties, as and when required.

### **Special Leave**

In addition to the time away afforded to all Associates, Associates who are PWDs are entitled to special paid leave for five (5) days in a calendar year to handle any matters related to their disabilities. In case an Associate who is a PWD needs to avail such special leave, the Associate should notify their manager that they will need to take time, unless there is an emergency, and when their leave will begin and end. The approval of such leave may however be conditional on the Associate submitting appropriate documents substantiating the need to avail leave, as may be deemed appropriate by Michelman. An Associate's request for leave in excess of this special paid leave, for a reason related to their disability, will be treated as a request for Reasonable Accommodation.

### **Accessibility**

Michelman will provide a work environment that allows Associates who are PWDs access to common facilities including physical environment, transportation, information and communications systems without any inconvenience. For official travel, Associates who are PWDs will be provided accessible modes of transport and will be allowed to travel with a companion/attender.

### **Engagement and Social Inclusion**

Michelman is conscious that in the course of employment, Associates who are PWDs may face issues regarding integration at the workplace. Towards this, Michelman shall take various initiatives from time to time, which shall be further outlined by the Liaison Officer/the Human Resource Department.

Specifically, Michelman shall: (a) undertake sensitization training for its Associates on the rights of PWDs (b) endeavor to ensure that PWDs participate in all Michelman sponsored events and that such events are conducted at accessible venues; (c) participate in job fairs, training and scholarship programs and invest in specific training and skill development of PWDs.

## **MAINTENANCE OF INFRASTRUCTURE**

### **Physical Infrastructure**

Michelman aims to ensure that all physical infrastructure (including buildings, furniture, facilities, transportation and services relating to the workplace) adheres to the accessibility standards as prescribed by the Government of India.

Further, Michelman shall ensure that during this period, in the event it builds / leases any new facility, it will evaluate such facility basis the above standards. PWDs are encouraged to report any accessibility related concerns to the Liaison Officer /the Human Resource Department.

### **Digital Infrastructure**

Michelman shall continuously strive to ensure that its documents, communication and information technology systems adhere to the prescribed accessibility standards. Specifically, Michelman shall ensure that: (a) it adheres to the website standards as specified in the guidelines for Indian Government websites, adopted by the Government of India; (b) documents placed on websites are in the Electronic Publication (ePUB) or Optical Character Reader (OCR) based pdf format.

### **Reasonable Accommodation**

To give complete effect to the RPWD Act, Michelman shall ensure that all Associates who are PWDs receive Reasonable Accommodation such that: (a) they are ensured equal opportunity in respect of their appointment to the Identified Posts; (b) they are able to perform the essential functions of the job and enjoy the same benefits and privileges of employment as non-disabled Associates.

Examples of Reasonable Accommodations may include (but not be limited to) acquiring or modifying certain equipment or devices, modifying assessment and training materials, modifying work schedules, reassignment to a vacant position, disability related leave, relaxed working hours, work-from home options, etc. Further, in the course of undertaking their duties, PWDs may approach the Liaison Officer/the Human Resource Department with a request for Reasonable Accommodation, which shall be considered on a case to case basis. At no point in time will Michelman require any Associate who is a PWD to bear (directly/indirectly) any costs pertaining to the Reasonable Accommodation provided.

All documents concerning an Associate's Reasonable Accommodation request would be strictly confidential.

## **COMPLIANCE AND MAINTENANCE OF RECORDS**

Michelman shall collect and maintain data regarding Associates who are PWDs, in the manner specified under the RPWD Act. All PWDs, upon joining employment, will be asked to voluntarily fill in a self-identification form with information regarding the concerned disability, and submit any medical reports and/or a certificate of disability obtained in the manner specified under



the RPWD Act. An Associate can edit the information provided at any time during their tenure with Michelman. Notwithstanding anything stated in the Associate Handbook, Michelman shall not, except in case of fraud or willful misconduct, penalize any Associate for not sharing complete information regarding their disability earlier. However, PWDs will be counselled and encouraged to share complete information and all medical records and disability certificates at the earliest.

Any information shared by an Associate regarding their disability will be kept strictly confidential. However, the following disclosures will be considered exceptions in this regard: (a) disclosures to managers/supervisors of PWDs, in connection with providing any Reasonable Accommodation; (b) disclosures to security personnel to facilitate any necessary support during an emergency; (c) disclosures to Government officials in connection with any investigation into the compliances under the RPWD Act.

The Company shall also maintain records containing the following particulars, namely: (a) the number of PWDs who are employed and the date from when they are employed; (b) the name, gender and address of such PWDs; (c) the nature of disability of such persons; (d) the nature of work being rendered by such employed PWDs; and (e) the kind of facilities being provided to such PWDs.

## **LIAISON OFFICER**

Michelman's Vice President & Managing Director, India, will be the Liaison Officer who will be responsible for ensuring adherence to this policy, the recruitment of candidates with disability, and arranging facilities and amenities for PWDs.

Specifically, the Liaison Officer shall be responsible for: (a) Implementing the action plan for making the workplace building and IT systems accessible for PWDs by liaising with the various departments in the organization (b) Ensuring that all Associates are aware of the policy, and the PWDs are aware of their rights under the policy and under the RPWD Act and RPWD Rules; (c) developing strategies to prevent discrimination and harassment, and ensuring integration of PWDs at the workplace.

The Liaison Officer will share the quarterly progress report with Chief Administrative Officer who would then present the progress report to the Chief Technology Officer & Executive Vice President, Asia.

## **GRIEVANCE**

The Liaison Officer should be contacted about any grievances regarding the content or implementation of this policy.

## **Violation of Policy**

Any Associate who violates this policy or is found to have directly/indirectly discriminated or harassed, coerced, bullied or intimidated (including denial of any Reasonable Accommodation, without any justification) an external or internal PWDs, will be subjected to Michelman's progressive disciplinary process up to and including termination of employment.

The affected PWD may approach the Global Human Resources Manager, the Chief Administrative Officer or the Chief Technology Officer & Executive Vice President, Asia, who will investigate the complaint adhering to the principles of natural justice. Michelman also assures that all complaints will be investigated in a confidential manner. However, allegations

made in bad faith and without any factual substance may also result in appropriate disciplinary action.

A PWD may also approach the Chief Commissioner or the State Commissioner appointed under the RPWD Act, who are required to dispose of the complaint within a period of 60 (sixty) days, (30 (thirty) days in exceptional circumstances).

### **Modification of the Policy**

Michelman reserves the right to modify this policy as and when required, *inter alia* to ensure compliance with applicable laws. Associates have the responsibility to always keep themselves familiarized with the latest version of this policy.

## Appendix – Prevention of Sexual Harassment at the Workplace Policy (for India-based associates only)

Updated 12.31.23

Michelman is committed to creating a safe and healthy work environment that enables its associates to work without fear of prejudice, gender bias, and sexual harassment. Michelman and its Associates (defined below) have a shared responsibility in contributing to a mature and respectful work environment. This Policy has been created as per the statutory requirement in the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013.

Any Associate who is found, after a formal investigation, to have violated this Policy will be subject to appropriate disciplinary action as per the findings of the inquiry into the Complaint. If the inquiry reveals that Sexual Harassment has indeed occurred, the harasser will be suitably disciplined.

Conversely, anyone making a false or frivolous claim of Sexual Harassment will also be subject to disciplinary action in accordance with the provisions of the SH Act and this Policy.

### SCOPE AND APPLICABILITY

The scope of this Policy is to prevent instances of Sexual Harassment at the Workplace (defined below), to address complaints and provide redress, to set out procedures for resolution, settlement and/or prosecution of acts of Sexual Harassment at the Workplace. The scope of this Policy is deemed to be a part of the service conditions of Associates.

This Policy is applicable:

- To all Associates regardless of the position, customers, suppliers, vendors, contractors, consultants, temporaries, visitors, service providers, and business partners of Michelman. It also applies to former associates of Michelman, provided in these cases, the Respondent (*defined below*) qualifies as an Associate of Michelman.
- Wherever persons have occasion to interact with each other in the Workplace.

This Policy is intended to be gender neutral, and to the extent possible, will apply uniformly in case of Sexual Harassment of any person, irrespective of the gender of the parties. Sexual Harassment is prohibited irrespective of who is involved in the behavior. If an allegation of Sexual Harassment involves persons whom Michelman does not directly employ or engage, the Internal Committee (defined below) will work with the relevant employer or other authorised persons to decide how the matter should be dealt with.

This Policy, the penal consequences of Sexual Harassment and the order constituting the Internal Committee will be displayed at a conspicuous place in the Workplace.

### Definitions

- **“SH Act”** means the Sexual harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Sexual harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013, including any statutory amendment or re-enactment

thereof, which extend to the whole of India.

- **“Aggrieved Person”** means an individual covered under this Policy who raises an allegation of Sexual Harassment having been committed against such individual by the Respondent, while at the Workplace or conducting business with Michelman, as the case may be.
- **“Appellate Authority”** means the appellate authority notified under clause (a) of Section 2 of the Industrial Employment (Standing Orders) Act, 1946, or any other authority that may be specified under the SH Act.
- **“Associate”** means any person employed at Michelman for any work as a full- or part-time, permanent or temporary associate, prospective associates (including offer holders or interview candidates) consultants, interns, contractors, ad hoc or honorary associates, probationers, trainees, apprentices, by whatever named called, whether employed on remuneration or not/working on a voluntary basis, or otherwise employed directly or through an agent, and with or without the knowledge of Michelman, and other personnel engaged by Michelman to undertake official work for remuneration or on a voluntary basis. In case of an allegation of Sexual Harassment against a contractor or personnel engaged by a third party, Michelman will work with the direct employer of the Respondent to decide how the matter should be approached.
- **“Complaint”** means a written complaint filed by a Complainant on account of Sexual Harassment at the Workplace.
- **“Complainant”** means an Aggrieved Person or a person who files a Complaint on behalf of such Aggrieved Person in accordance with this Policy.
- **“Employer”** means (i) any person responsible for the management, supervision and control of the Workplace; or (ii) the relevant person discharging contractual obligations with respect to the Associates.
- **“Internal Committee” or “IC”** means the committee constituted in accordance with the provisions of the SH Act.
- **“Policy”** refers to this policy on Prevention of Sexual Harassment at the Workplace.
- **“Respondent”** means a person(s) against whom the Complainant has made a Complaint.
- **“Retaliatory Behaviour”** includes one or more of the following actions that are initiated, attempted or encouraged, either directly or indirectly, on account of an Aggrieved Person having raised a complaint of Sexual Harassment under this Policy or for having cooperated, testified or participated in any investigation/inquiry under this Policy: disciplinary action, threats of any nature whatsoever (*including threats to inflict physical or mental harm on the individual concerned or on their family members, threats to raise internal complaints or notify their family members, threats to circulate private or morphed photos, pictures, messages, videos or other forms of media*), any form of intimidation, discrimination, victimization; making repeated requests or imposing pressure to withdraw a complaint (including offering money or favourable treatment in exchange for withdrawing the complaint, or unfavourable treatment in case the complaint is not withdrawn), increasing work pressure, changing the nature of work, altering the reporting manager or location of work or shift timings, and a general refusal to cooperate at work.

- **“Workplace”** refers to: (a) any office (*whether standalone or within a co-working space*), branch, unit, department, enterprises, establishments, or undertakings established, owned, controlled or wholly or substantially financed by fund provided directly or indirectly by Michelman (**“Physical Premises”**), (b) Michelman facilities and places visited by Associates while fulfilling professional duties or during the course of employment or engagement including off-site meetings or events sponsored by Michelman and transportation provided by Michelman for the purpose of commuting to/from the place of employment; and (c) any other location provided for under the SH Act. Without limitation, ‘Workplace’ will specifically include parking lots in the Physical Premises, airports, and the home / place of work of the Complainant (*in a remote working environment*).

## SEXUAL HARASSMENT

“Sexual Harassment” includes any of the following unwelcome/unwanted physical, verbal or non-verbal acts, conduct or behavior (whether directly or by implication) of a sexual nature, illustrated but not limited to, the examples listed as follows:

- Physical conduct of a sexual nature, which includes all unwanted or unwelcome physical contact and advances, ranging from intentional touching, pinching, grabbing, fondling, patting, and brushing against another’s body to sexual assault and rape.
- Demand or request for sexual favours, repeatedly asking an individual to enter into a relationship or to meet outside of work.
- Verbal forms of sexual harassment including unwarranted innuendoes, suggestions and hints, sexual advances, comments with sexual overtones, sexually colored remarks, unwelcome graphic comments about a person’s body made in their presence or directed toward them, unwelcome and inappropriate enquiries about a person’s sex life, suggestive comments, threats, slurs, sexual propositions, sexual jokes or teasing, misogynist humor, sexually colored gender specific jokes and unwelcome whistling directed at a person or group of persons.
- Non-verbal forms of sexual harassment include unwelcome gestures, indecent exposure, the unwelcome display of pornography, sexually explicit visual material such as pictures, pinups, cartoons, graffiti, computer programs, catalogues and objects, written material that is sexual in nature such as letters or notes containing a sexual comment, leering or staring at another’s body and or sexually suggested gesturing and sexual messages or images sent via text / e-mails which may be perceived by the recipient as creating a hostile work environment.
- Routinely calling before or after work hours and asking personal questions, repeated messaging on social media, making remarks, assumptions or spreading rumours about an individual’s personal life, character, relationships, sexuality, sexual preferences, sexual orientation, sexual experiences, gender expression including on social media (*such as WhatsApp, Instagram or any similar platform*).
- Lurid stares, making comments on an individual’s body, attire, or appearance, insisting on video calls, making sexual gestures or sounds.
- Circulating, distributing, or posting private photos, pictures, videos, other forms of media, or links to them without authorization.
- Physical contact (hugging, kissing, pinching, patting, grabbing, any other unwanted touch or any attempt at the foregoing), confinement, molestation, stalking (physical or cyber stalking), display of sexually coloured pictures, signs, graffiti, posters, or any other communication which could offend a Complainant’s sensibilities and health and affect work performance.

- Quid pro quo harassment occurs where an owner, employer, manager or colleague demands or requests sexual favors in exchange for undertaking or attempting to influence the process of employment, promotion, training, discipline, dismissal, salary increment or other benefit of an associate or job applicant.
- Sexual favoritism exists where a person who is in a position of authority rewards only those who respond to his/ her sexual advances, while other associates, who do not submit themselves to any sexual advances, are denied appropriate promotions, merit rating or salary increases.
- Implied or explicit (a) promise of preferential treatment in employment, (b) threat of detrimental treatment in employment or (c) threat about present or future employment status, as well as conduct which interferes with an Associate's work or creates an intimidating, hostile or offensive work environment, and indulging in humiliating treatment that is likely to affect health and safety, may amount to sexual harassment if it occurs or is present in relation to any other act of Sexual Harassment.

Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature apart from those listed above will constitute Sexual harassment if by reasonable perception and common discretion, it qualifies as sexually offensive. Sexual Harassment maybe one incident or series of incidents.

It is important to be aware that the intention or motive of the alleged harasser is not relevant when determining whether the behavior is unwelcome. The conduct does not have to be intentionally designed to harass a person for it to be considered Sexual Harassment. Behaviors that might be acceptable in a social situation may constitute Sexual Harassment in the Workplace.

All Associates have a responsibility to communicate clearly to colleagues about behavior that may be offensive and ask that it be discontinued. In case of any doubt or lack of clarity, Associates should approach the Human Resources Department or members of the IC. Michelman holds the right to prohibit any conduct that may reasonably be interpreted as Sexual Harassment whether or not such conduct is pervasive and severe enough to meet the technical legal requirements of Sexual Harassment.

## **INTERNAL COMPLAINTS COMMITTEE**

Michelman has formed an Internal Complaints Committee that will investigate Complaints in accordance with the SH Act, manage the process of inquiry and appropriate settlement, and provide for speedy redressal of Complaints relating to Sexual Harassment in accordance with the provisions of the SH Act.

## Appendix – Social Media Policy

Updated 12.31.23

### Policy

Michelman supports the use of social networking sites, personal websites and weblogs can positively impact our business. Moreover, Michelman respects the desire of associates to use social media as a medium of self-expression.

Michelman fully respects the legal rights of our associates in all countries in which we operate. In general, what associates do on their own time is their affair. However, activities in or outside of work that affect your Michelman job performance, the performance of others, or Michelman's business interests are a proper focus for Company policy.

If an associate chooses to identify themselves as an associate of Michelman on such internet venues, some readers of such websites or blogs may view the associate as a representative or spokesperson of the Company. In light of this possibility, Michelman requires, as a condition of employment, that associates observe the procedures below when utilizing social networking sites, personal websites and weblogs.

### Business Conduct

Know and follow Michelman's Code of Conduct and Ethics. Remember that the rules outlined in Michelman's Code of Conduct and Ethics also apply to associate behavior within social media and online spaces including, but not limited to, our rules and policies regarding disclosure of sensitive, proprietary, client and client-related confidential information and our policies regarding discrimination and harassment.

Associates should clearly identify themselves - name and relevant role at Michelman - when discussing Michelman or Michelman related matters. Be clear and write in first person. Associates should also make it clear that they are speaking for themselves and not on behalf of the Company.

Associates must not use blogs or personal websites to support or advocate for conduct that is prohibited by Company policies.

Michelman associates are personally responsible for the content they publish on blogs, wikis or any other form of user-generated media.

### Social Networking Setup

Associates should not use their Michelman email addresses for any personal use of social media. Michelman email addresses may only be used when the activity on social media has been approved, and the associate is representing Michelman in an authorized capacity.

Company logos, trademarks or other intellectual property may not be used without written consent of Strategic Communications (communications@michelman.com).

### Confidential Information

Do not provide Michelman's or another's confidential or other proprietary information. Ask permission to publish or report on conversations that are meant to be private or internal to

Michelman.

Respect copyright, fair use and financial disclosure laws. Reference or cite sources appropriately. Plagiarism applies online as well.

Do not disclose non-public financial or operational information. This includes strategies, forecasts and most anything with a dollar-figure attached to it.

### **Associates, Customers, and Suppliers**

Personal data protection regulations require prior consent before using photos or videos of associates, business partners, customers, or suppliers on any social media platform without first obtaining written consent from an authorized Michelman representative, or the customer or supplier. Do not reference, cite, or post pictures of Michelman facilities with written consent.

Associates must not use obscenities, profanity or vulgar language. Associates must not use blogs or personal websites to harass, bully or intimidate others. Behaviors that constitute harassment and bullying include, but are not limited to: comments that are derogatory with respect to race, religion, gender, sexual orientation, color, or disability; sexually suggestive, humiliating, or demeaning comments; and threats to stalk, haze, or physically injure others.

### **Personal Accounts**

Personal blogs should have clear disclaimers that the views expressed by the author in the blog are the author's alone and do not represent the views of Michelman. Example language: "The postings on this site are my own and don't necessarily represent Michelman's positions, strategies or opinions." Associates should not refer to Michelman, and/or his or her job title or role at Michelman.

Social blogging, media and networking activities should not interfere with work commitments.

### **Requirements**

Michelman requires that associates not provide any kind of professional reference or recommendation through LinkedIn (or other social media site) to any companies, people, customers, suppliers or products that identifies the referencing associate as an agent or associate of Michelman.

If an associate is compelled to offer a reference to a company, person or service, it cannot be done as an agent or associate of Michelman. It will need to be a 'personal' comment/recommendation not linked to Michelman.

This policy applies to all forms of social networking media or technology on the internet, radio, television or in print media.

The absence of, or lack of explicit reference to a specific site does not limit the extent of the application of this policy. Where no policy or procedures exist, associates should use their professional judgment and make the most prudent decision possible and consult with the Human Resources Department if needed.

Any associates found to be in violation of any portion of this policy will be subject to immediate disciplinary action, up to and including termination of employment.



# Appendix – Employment of Relatives Policy

Updated 12.31.23

## Overview

Michelman is committed to employment and advancement based upon the associate's qualifications, merit, abilities, and the business need for the role. It does not discriminate in favor of, or in opposition to, the employment of relatives of current, non-shareholding associates. There is a separate employment policy for shareholding family members.

## Scope

Due to the potential for perceived or actual conflicts (such as favoritism or personal conflicts from outside the company carrying into the daily work environment) Michelman will hire, or consider other employment actions, concerning relatives of persons currently employed only if:

- Candidates for employment will not be working directly for or managing a family member.
- Candidates for employment will not occupy a position in the same line of authority in which associates can initiate or participate in decisions involving a direct benefit to the relative. Such decisions include hiring, retention, transfer, promotion, wages and leave requests.
- There is a valid business need for that role (we are posting it and considering other qualified applicants).

## Definitions

"Family member" is defined as one of the following: relationships by blood—parent, child, grandparent, grandchild, brother, sister, uncle, aunt, nephew, niece and first cousin; and relationships by marriage—husband, wife (as defined by state law in the United States), step-parent, step-child, brother-in-law, sister-in-law, father-in-law, mother-in-law, son-in-law, daughter-in-law, half-brother, half-sister, uncle, aunt, nephew, niece, spouse/partner of any of the above and cohabitating couples or significant others.

There will be no exception to this policy without the written consent of the CEO following consultation with the Executive Leadership Team (ELT).

# Certificate of Acknowledgment

Updated 12.31.23

By signing this document, I certify that:

- I have read and understand Michelman's Code of Conduct and Ethics and related country specific policies.
- I understand I have access to Michelman's Code of Conduct and Ethics on the Michelman Intranet.
- I do not suspect, nor do I have knowledge of, any violations of Michelman's Code of Conduct and Ethics not fully disclosed to the Company.
- I will report any suspected, or known, violations of the Michelman Code of Conduct and Ethics to the Michelman's Ethics Hotline, or the Human Resources Department.
- I understand that any previously issued Code of Conduct and Ethics is superseded by this version and that Michelman retains the right to change them as required.
- I acknowledge that Michelman's Code of Conduct and Ethics and related policies are neither a contract of employment nor a legal document.

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Date: \_\_\_\_\_

*Please return this certificate to your Human Resources Business Partner.*