

Policy number: SL-POL-004.002
Original effective date: Aug. 1, 2014
Revision number: 3
Revised effective date: Feb. 12, 2021
Pages: 2

SOLENIS POLICY Conflicts of Interest

1.0 Policy

Employees of Solenis UK Industries Limited, its commercial units and majority-owned or controlled subsidiaries (collectively “Solenis”), or its representatives will promptly report to Solenis any activities that may constitute a conflict of interest. A conflict of interest exists when there is a conflict between an employee’s obligation to Solenis and personal economic or business interests. The report should be made to the Legal department to determine on behalf of Solenis whether a conflict of interest exists under this policy and to take such action as deemed appropriate. Issues related to officers of Solenis International LP and officers of its wholly owned business units must be reported to the general counsel.

2.0 Conflicts of interest requiring prior written approval

It is not possible to list all situations which may constitute a conflict of interest. However, the following activities by an employee do constitute a conflict of interest and are prohibited unless the prior written approval of the general counsel or his or her designee is received:

- Having a direct or indirect interest in, or serving as a director, officer, employee, consultant, agent or franchisee of any competitor of Solenis.
- Having a direct or indirect interest in, or serving as a director, officer, employee, consultant, agent or franchisee of any entity with which Solenis does or is seeking to do business (including suppliers, customers and contractors) if the employee has direct responsibility for Solenis' decision whether or not to do business with such entity.
- Using Solenis copyrights or trade names in a personal capacity.
- Engaging in land or property transactions or bidding on public or private construction projects in which Solenis may have an interest.

An employee whose duties bring him or her into contact with any entity that employs or is owned by a relative, in whole or in part, must obtain prior written approval from his or her supervisor and avoid preferential treatment or any other conduct which may compromise the employee's ability to



give Solenis his or her best efforts and undivided loyalty. Such written approvals must be reported by the approving supervisor to the general counsel or his or her designee.

3.0 Scope

This applies to Solenis UK Industries Limited, its commercial units and majority-owned or controlled subsidiaries.

4.0 Owner

General Counsel.

5.0 Exceptions

There are no exceptions to this policy.