

Techmer PM, LLC Code of Conduct

Techmer PM's Vision: Enhancing lives through the design of innovative and sustainable modified polymers.

Techmer PM's world class status and position as a respected and most trusted partner for our customers, our suppliers, and your co-workers depends directly on your honesty and integrity, your respect for, and honor of, these business partners, and your full commitment to safety and operational excellence. You are the key to our successful work to create "shared value" with ethical, respectful, and transparent collaboration among all our business partners.

This Code of Conduct summarizes and emphasizes the requirements and expectations we have of you as a Techmer PM employee in your day-to-day work. The Code of Conduct applies to all employees of Techmer PM and its affiliated companies. In our commitment to maintain an honest, profitable, and sustainable enterprise, Techmer PM pledges to work only with ethical and responsible business partners who will also act in line with this code. We also strive to foster an inclusive culture where all our employees and business partners are challenged, rewarded, and empowered to drive progress and growth using sustainable technologies. Our stakeholders deserve nothing less.

ETHICS AND INTEGRITY

Anti-Corruption and Anti-Bribery: Techmer PM requires that all its stakeholders conduct business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly, and with integrity in all business dealings and relationships. We do not tolerate any form of corruption, bribery, kickbacks, extortion, embezzlement, or other unethical actions. Techmer PM employees must never (directly or through intermediaries) give, offer, accept, or request any payment, gift, hospitality, or promise with the expectation or goal that a business advantage will be received in exchange. This applies to all Techmer PM business relationships, public and private. Techmer PM employees must understand and comply with any applicable anti-bribery and anti-corruption laws and regulations, including the US Foreign Corrupt Practices Act and the UK Bribery Act.

Anti-Money Laundering and Anti-Terrorism Financing: Money laundering is the attempt to conceal the source of the proceeds of crime and to disguise them as legitimate. US and international Anti-Money Laundering (AML) laws make it a crime to knowingly engage in a transaction that involves the proceeds of criminal activity. Terrorist financing is providing or collecting funds to support terrorist acts. US and international Counter-Terrorism Financing (CTF) laws make it a crime to use legally or illegally obtained funds to further terrorism.

Techmer PM is committed to complying fully with all applicable AML and CTF laws. We will go beyond the requirements of the law when necessary, by taking proactive steps to prevent the use of our products and services to facilitate money laundering and terrorist financing. To this end, Techmer PM will only conduct business with reputable customers who are involved in legitimate business activities and whose funds are derived from legitimate sources. You, as an employee, have an obligation to understand "red flags", to watch for suspect business transactions, and to escalate potential compliance concerns related to AML or CTF to the Chief Financial Officer (CFO) without notifying or "tipping off" anyone else involved in the transaction.

Competition: US Antitrust laws prohibit conduct which reduces or eliminates competition within the marketplace. These laws control interactions with actual and potential competitors, customers, suppliers, and other third parties. Price fixing arrangements and other anti-competitive conduct is strictly prohibited. Violation of these laws could expose you and Techmer PM to criminal and civil penalties. As a Techmer PM employee, you may encounter individuals who are your counterparts at competing companies or suppliers during trade shows, industry meetings, or in the field. During such encounters, you must manage your conversations and actions to avoid discussions or disclosures of pricing, material costs, customers, profits, product plans and other information which might suggest or invite anti-competitive schemes, plans, or intentions. In addition to violating anti-trust laws, such disclosures also likely would violate your obligations of confidentiality to Techmer PM.

Conflicts of Interest: A conflict of interest is a situation in which you might have a personal interest which could conflict with, or which could impair, your independent judgement of, the best interests of Techmer PM. To reduce conflicts of interest, Techmer PM requires you to avoid business involvement with, or investments in, companies which compete with, or which have business relationships with, Techmer PM. However, other situations may naturally arise in which you have competing loyalties because of a close friend, a family member, or other conflict. If not disclosed and avoided, such a situation could cause you to choose between a personal relationship or benefit and the best course for Techmer PM. In such a situation, Techmer requires you to (i) immediately report the conflict to your direct supervisor, and (ii) to remove yourself from the decision-making process or situation which created the conflict. For example, if a family member is the salesperson for a Techmer PM supplier, you may not be involved in purchasing decisions involving that supplier. In the example, Techmer would shift the decision-making responsibility to a colleague without a conflict to eliminate your conflict.

Gifts & Business Courtesies: Techmer PM is committed to conducting its business with customers and suppliers solely on the merit of the products and services involved. Techmer PM prohibits any employee, or a relative or member of his/her immediate family from accepting any gift, entertainment, special accommodations, employment, or use of property or facilities, either directly or indirectly, from anyone with whom you conduct business on behalf of Techmer PM. However, this policy is not intended to prohibit advertising or promotional items of nominal value and traditional related business functions, such as meals, meetings (including appropriate lodging), or to preclude receiving or giving token marketing items such as pens, hats, coffee mugs, etc., of nominal value.

Intellectual Assets: Techmer PM's intellectual property (our trademarks, logos, copyrights, trade secrets, confidential information, customer and supplier information, test methods, "know-how", and patents) are among our most valuable assets. Unauthorized use of these assets or the disclosure, or publication of our information can destroy the value of these assets. For this reason, Techmer PM requires all employees with access to such information to enter into a binding Non-Disclosure and Confidentiality Agreement which provides details of your obligations regarding any confidential information. Techmer PM also requires you to immediately report any suspected misuse of trademarks, logos, or misappropriation of confidential information and trade secrets to Techmer PM's management.

Also, Techmer PM employees must respect the intellectual property rights of others. Inappropriate use of others' intellectual property may expose Techmer PM and you to criminal and civil fines and penalties under applicable state and federal laws, including the US Defend Trade Secrets Act.

Techmer PM's Property: Techmer PM's property, such as its facilities, materials, equipment, inventory, and tools, may only be used for Techmer PM's business. Such property may not be used for competing purposes, for the personal gain of an employee or third party, or in any other inappropriate manner that could consume, cause damage to, or loss of value to such property. All tools and equipment that Techmer PM provides to employees remain Techmer PM's property and must be treated accordingly.

Confidential Information: As mentioned in the Intellectual Assets section above, every Techmer PM employee must abide by all federal laws, state laws, and the written agreements regarding the non-disclosure and confidentiality of our confidential information and trade secrets ("Confidential Information"). Confidential Information may be stored or recorded any format or medium, hard copy, audio files, visually, drawings, digitally, or electronically in Techmer PM's computers, networks, online, cloud-based storage, or sent through the communications systems. Confidential Information includes product compounding information and formulae, supplier information, test methods, quality control processes, test results, new product plans, information regarding specific customers, customer lists, employee information, financial information, business plans, and strategies. Techmer PM strictly prohibits the unauthorized release, use, or disclosure of any Confidential Information in any format. All authorized disclosures require that the recipient of the information sign an approved, written Non-Disclosure Agreement which limits use and re-disclosure of the Confidential Information. All employees with access to Confidential Information must sign a written Non-Disclosure and Confidentiality Agreement. Confidential Information must always be safeguarded by every employee.

State and federal laws, including the United States' Defend Trade Secrets Act of 2016 (DTSA) makes the theft, unauthorized use, misappropriation, or disclosure of Techmer PM's Confidential Information unlawful and provides a mechanism for the company to seek civil penalties for any violations by third parties or employees. This law also provides for criminal actions to be brought by the government against individuals and companies who violate the

law. Techmer PM always acts aggressively to protect its Confidential Information and will continue to do so. Threatened and actual violation of our non-disclosure policy and/or non-disclosure agreements will result in severe discipline up to and including termination

HUMAN RIGHTS AND LABOR RIGHTS

Human Rights, Forced and Child Labor: Techmer PM does not use or permit child labor, forced labor, slavery, force against workers, or other forms of coercion, fraud, deception, or abuse of power in any of its workplaces or in the workplaces of any of our supply chain business partners throughout the world. We endorse and support international principles of human rights, including those expressed in the United Nations (U.N.) Universal Declaration of Human Rights, the Trafficking Victims Protection Act of 2000 (as amended), the California Transparency in Supply Chains Act of 2010 and the PROTECT Act (Prosecutorial Remedies and Other Tools to End the Exploitation of Children Act). We require our suppliers, representatives, and other business partners to meet these standards as well, regardless of local laws, customs, and norms. We review the U. S. Department of Labor’s “List of Goods Produced by Child Labor or Forced Labor” and the U. S. Department of Justice’s “Trafficking in Persons Report”. Any suppliers with sourcing from countries identified by as high risk and/or in high-risk products are reviewed and certifications sought as appropriate. Compliance with these laws is also required from all suppliers through our written Supplier Conduct Principles.

Human Trafficking: Techmer PM does not use, support, or benefit from, and affirmatively opposes any act involved in the recruitment, abduction, transport, harboring, transfer, sale, or receipt of persons within national or across international borders, through force, coercion, fraud, or deception. Techmer PM requires all employees to be aware of this issue and to immediately report any discovery of slavery or human trafficking involving any business partner or supplier to Techmer PM’s management.

Freedom of Association and Social Dialog: Techmer PM honors your right to join, form, or decline to form a labor union without fear of reprisal, intimidation, or harassment. Where employees are represented by a legally recognized union, Techmer PM strives to establish a constructive dialogue with their freely chosen representatives and to engage in collective bargaining in good faith with such representatives.

Additionally, in every workplace, we encourage you to ask questions and raise concerns or issues as part of an open atmosphere of social dialog conducted in a professional, respectful, and considerate manner. Communication concerning safety, health, the environment, sustainability, worker rights, working conditions, and other matters is welcome, and all of our people are encouraged to participate in this process.

Health and Safety: Techmer PM is focused on always providing a safe work environment for all employees and visitors. Safety is our #1 priority as we strive to build a world class safety culture at every Techmer PM facility. To achieve this status, all of us need to be fully engaged and take ownership of our own safety and the safety and wellbeing of our colleagues wherever we work. We must motivate and hold each other accountable for working safely, and always, we must proactively identify and implement solutions to improve safety.

Safety requires cooperative action throughout the company which is accomplished by training and carefully studying our operations from a safety standpoint and adopting measures needed to keep everyone safe and healthy. This includes safeguarding our operations and equipment, the development of safe work methods and procedures, and where necessary, the wearing of personal protective equipment. It is essential that we follow all safety rules, signs, instructions and to promptly report hazards or problems to a supervisor. Techmer PM is committed to taking all necessary precautions to protect our workers and visitors.

Diversity and Equal Opportunities: Techmer PM offers equal employment opportunity to all employees, applicants, and potential employees to be employed, retained, promoted, and otherwise treated on the basis of merit, qualifications, and competence. This policy embraces diversity and is applicable without regard to any individual’s race, color, religion, national origin, ancestry, marital status, physical or mental disability, veteran status, sex, age, sexual orientation, or other characteristic protected by applicable federal, state, or local law. Diversity at Techmer PM is valued and celebrated.

Working Hours and Wages: Techmer PM abides by all applicable state and federal labor and wage laws and regulations. Techmer PM's employees in some locations have collective bargaining agreements. Techmer PM complies with applicable laws and regulations regarding mealtimes, work breaks, overtime, make up time, other premium pay arrangements, holidays, illness leaves, family medical leaves, and family and parental leaves as well as any contractual obligations.

Techmer PM permits work from home flexibility to the extent possible based upon your role, primary job functions, location, the need for you to collaborate with your co-workers, and interact with customers, suppliers, and the public. This policy is designed to attract and retain top talent, increase productivity, and deliver exceptional products and services to our customers while supporting your well-being, thus providing a sustainable competitive advantage for the Company.

In each case, possible flexible work arrangements will be determined based on business needs, customer needs, and your preferences, performance, schedule, and job requirements. All employees must adhere to all applicable wage and hour laws when working remotely. Supervisors are responsible for ensuring nonexempt employees are correctly tracking their time in the payroll system.

Employee Privacy: Techmer PM respects employees' privacy and handles personal data in confidence and in compliance with applicable laws and regulations. Techmer PM requires third party software and service providers to be fully compliant with applicable state, federal and international laws and regulations protecting the privacy of your personal data as well.

Employment Practices: Techmer PM employs only workers who are legally authorized to work for Techmer PM. Techmer PM is responsible for validating employees' eligibility to work through appropriate documentation.

Emergency Planning: Techmer PM has in place first rate safety protocols at each of its locations including emergency exits, first aid supplies, fire suppressants and detection equipment, and provides continuous training for its employees. We cooperate with first responders in each community where we have facilities and provide training for our workers in emergency response.

Workplace Violence: Techmer PM is committed to preventing workplace violence, eliminating co-worker aggression, and maintaining a safe work environment. We have adopted guidelines to deal with intimidation, harassment, bullying, threats, or violence that could occur at the workplace or during work-related activities.

All employees, customers, vendors, and business partners must be treated with courtesy and respect at all times. Everyone is expected to refrain from physical confrontations or other conduct that may be dangerous to others. Conduct that threatens, intimidates, or coerces another employee, customer, vendor, or business employee will not be tolerated.

Anti-Harassment and Non-Discrimination: Techmer PM strives to maintain a respectful, friendly, non-disruptive work environment with fair and comfortable working conditions for all employees. Any form of harassment is contrary to this goal and is strictly prohibited. You have the right to a workplace without discrimination or harassment.

We have an affirmative duty under Title VII of the 1964 Civil Rights Act, as amended, to maintain a workplace free from sexual harassment. Any reports of sexual harassment will be investigated, and management will take appropriate disciplinary action based upon the results of the investigation.

Equal Opportunity Employer

We are committed to making sure that everyone who works here gets fair and equal treatment regardless of race, religion, gender, color, age, national origin, sexual orientation, ancestry, veteran status, or disability. Each employee's opportunities are dependent on their ability and performance. Employees must not act based on prejudice or discrimination in any matters concerning fellow employees, customers, or suppliers.

It is also Techmer PM' policy that our employees perform in a work environment that is free from any form of harassment, including, but not limited to, sexual, racial, or religious harassment. Failure to adhere to these principles can result in disciplinary action, up to and including termination.

Any employee who believes they have been the subject of harassment or discrimination should report the incident to their supervisor or any member of management with whom the employee feels comfortable or use the Techmer PM **Whistleblower/Ethics Hotline** to report the incident at once. Complaints may also be brought to the attention of the Human Resources Department. Any complaint will be investigated as confidentially as possible. After an investigation has been completed, a determination will be made by appropriate management officials about the resolution of the case and the reporting party will be advised of the results.

SUSTAINABLE OPERATIONS

Environment, Health, and Safety: Techmer PM operates its facilities in full compliance with all local, state and federal environmental, health and safety laws and regulations. We identify and manage chemical and other materials posing any specific hazards involved with the material if released to the environment or if workers are exposed and ensure safe handling, movement, storage, recycling or reuse, and disposal of such materials. Compliance includes tracking, reporting, and comparing our performance to the performance of others in our industry. In the health and safety area, we track and monitor reportable incidents and compare this data to industry standards based on hours worked and product volumes. This provides metrics so that we can pursue continuous improvement.

Going beyond basic compliance and comparisons, we are committed to environmental stewardship. Our goal is to reduce our impact on the planet in every way. We work with our supply chain business partners and our customers to improve customer products while reducing raw material consumption and increasing the use of recycled materials. We continuously champion change and collaborate with thought leaders within our industry. We inspire and influence others to intentionally design, promote, enable, and support sustainable innovation. The result is that we develop more efficient and sustainable practices to preserve the environment for future generations.

Sustainable Procurement: Techmer PM has developed a written statement of "Supplier Conduct Principles" which requires sustainable business practices by our suppliers. Acceptance of this statement via electronic signature is required for new suppliers before conducting business with Techmer PM. It addresses most of the same areas as this Code of Conduct.

Resource Optimization: Techmer PM requires its suppliers to provide raw materials that are produced in a responsible manner that does not negatively impact the wellbeing of humans, animals, ecosystems, biodiversity, and other living systems. Techmer compounds these raw materials and additives following these same rules. Throughout our operations, we meter, monitor, and report water and energy usage. Techmer PM's Sustainability Strategy establishes facility and organizational efficiency targets that are tracked and reported on an annual basis so that we can continuously improve efficiency. This reporting is normalized against the amount of material produced at each facility, for comparison over years.

Product Development: Techmer PM incorporates sustainable design into our processes and product development. We intentionally design our products and assist our customers in the design of their products, to reduce or eliminate material usage whenever possible and to increase the use of recycled finite natural resources. Our sustainable product development efforts fall into three categories: (i) recycle enablers, (ii) biodegradable alternative resins, and (iii) sustainability enablers. This approach not only enables us to meet our own sustainability goals, it permits us to aid all customers to meet their sustainability goals through increased recycle, compostable/biodegradable resins, machine efficiency, or other solutions.

Renewable Energy: As part of Techmer PM's Sustainability Strategy, we are committed to reducing our dependency on finite natural resources and reducing our impact on the environment by increasing our percentage of energy utilization from renewable resources. We will maintain renewable energy utilization where available and we will continue to explore renewable options as these become available.

Waste Minimization: As part of Techmer PM's Sustainability Strategy, we continue to minimize waste from our operations through engineering, efficient and rigorous inventory management, elimination, reduction, reuse, and recycling. One of our key goals is to achieve zero inventory shrinkage. We monitor, maintain, and report performance relative to our waste reduction objectives. Our goal is to obtain zero waste-to-landfill certification for all sites.

Sustainable Capital Investment: Techmer PM's Sustainability Strategy includes bringing concerns about our people, our planet, and our profit into all of our decisions regarding capital decisions and expenditures. Long term efficiency and sustainability are more important to short term profits. When we invest capital, we do it in an efficient and sustainable manner. We establish objectives related to sustainable capital deployment and constantly measure our performance against our objectives.

GENERAL

All Techmer PM employees and stakeholders must comply with all applicable laws and regulations. These may vary depending on the location of your workplace. If the provisions of the Code of Conduct are found to be incompatible with applicable laws and regulations, then applicable laws and regulations take precedence.

The Code of Conduct is a broad but not exhaustive document. Techmer PM's policies provide further guidance and specificity. You are each personally responsible for understanding and acting in accordance with the Code of Conduct and Techmer PM's policies. The Code of Conduct is available on Techmer PM's intranet and website. All supervisors are responsible for ensuring that their employees are familiar with the Code. If you have questions, you should follow up with your supervisor or with an HR team member.

If you suspect a breach of the Code of Conduct, you must follow up and act on that concern. Further, you have a duty to cooperate with any investigation or inquiry of any alleged violation. Reports and concerns can be made to your supervisor, through an HR team member, or through Techmer PM's **Whistleblower/Ethics Hotline**. Techmer PM will not tolerate any form of retaliation for any reports made in good faith.