



Do the Right Thing the Right Way. Always.



Code of Conduct

At a Glance

- **Our Mission, Vision, and Values Reflect Where We Are Going. Our Code Explains How We Will Get There.** Our customers, business partners, and investors trust us to conduct business with integrity, and our Code is a critical resource in maintaining their trust. It helps each of us to:
 - » Comply with applicable laws, regulations, and Alkegen policies.
 - » Promote the highest standards of ethical conduct.
 - » Address common ethical situations we could encounter at work.
 - » Manage improper conduct and behavior in our workplace.
 - » Avoid even the appearance of anything improper in connection with our business activities.
- **In Our Workplace and Our Community,** we strive to be inclusive, welcoming unique contributions and fostering a trusting and open environment where each person is treated in a way that is consistent with our values. We aim to prevent unlawful discrimination, harassment, and retaliation. We honor the rights of all people and make the safety and well-being of our employees a top priority. We are active in the communities where we live and work, promoting quality of life outside our corporate walls. We participate responsibly in political and charitable activities.
- **We Follow the Law.** We conduct business with integrity and zero tolerance for bribery and corruption. As a company that operates around the world, we understand the importance of complying with trade compliance laws and regulations. We also understand that long-term relationships strengthen our business, our reputation, and our future. So, we compete fairly in the marketplace and comply with antitrust and competition laws.
- **Each one of us is Alkegen.** We make decisions based on what's best for the Company and strive to avoid even the appearance of a conflict of interest. We do not offer or accept inappropriate gifts or benefits. We source responsibly, choosing external business partners who share our high standards, and we monitor their performance to ensure they are complying with our policies and the law. We understand that uncompromising product quality and safety are essential to not only meeting our customers' expectations but in securing our future.
- **As Stewards of Alkegen,** we protect both tangible and intangible assets so we can better serve our customers and preserve value for our shareholders. We maintain accurate records so that we can make responsible business decisions and advance our mission. We protect the confidential information of others and expect the same from our partners. We are passionate about protecting privacy and following laws aimed at safeguarding personal data.
- **We Speak Up** if we see or suspect behavior that violates our Code, our policies, or the law. We know that the actions we take (or fail to take) have an impact on Alkegen, helping to define the kind of company we are today and the kind of success we will achieve tomorrow.

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A Message From Our CEO



“... your behaviors, actions, and decisions matter – to Alkegen and everyone we serve.”

John C. Dandolph

At Alkegen, we're changing the world for the better.

Every product we make, every innovation we develop takes us a step closer to our mission of helping people breathe easier, live greener, and go further than ever before. We're proud of our culture, the difference we're making, and the lives we're touching – we're dedicated to sustainability and fanatical about human health.

As a member of Alkegen, you are a steward of our culture, our reputation, and our future growth. We conduct all of our business at the absolute highest moral and ethical level. This is not negotiable. Our word and our integrity are everything. That's a tremendous responsibility, and our Code of Conduct is a resource designed to help you. The Code is your guide to doing business with integrity, making ethical and responsible choices, and bringing our values to life through your behaviors.

Our work is rewarding, but it can also be complicated. The Code is here to help you understand what Alkegen expects and navigate ethical situations you're likely to face in your daily work. It also directs you to policies and other resources for more information and provides you with details on how to speak up about unethical or illegal conduct.

Remember, your behaviors, actions, and decisions matter – to Alkegen and everyone we serve. With your help and commitment to our Code, we will build lasting trust in the Alkegen brand and create a legacy we can all be proud of – for generations to come.

A handwritten signature in black ink, appearing to read 'John C. Dandolph'. The signature is fluid and cursive, written on a white background.

John C. Dandolph
President and Chief Executive Officer

Our Mission, **Vision**, and Values



Our Mission

At Alkegen, we are guided by a common purpose to help people breathe easier, live greener, and go further than ever before.

Our Vision

To become the world's most sought-after specialty materials platform dedicated to sustainability & human health.



Our Values

- **Grow.**
- **Be Bold. Move Fast.**
- **All Passion. No Politics.**



Our Code: Guided by a Common Purpose

Code Overview

Alkegen is in the business of smart engineering – saving energy, reducing pollution, cleaning the air we breathe, preventing fires – even saving lives. We're proud to say that we do good in our world, and it's you, our people, who have made us who we are: a trusted partner to our stakeholders around the globe.

To preserve that trust, we rely on every Alkegen employee to follow our Code of Conduct (the "Code"). The Code is a critical resource, designed to help you:

- » Comply with applicable laws, regulations, and Company policies.
- » Promote integrity and the highest standards of ethical conduct.
- » Address common ethical situations you could encounter in your work.
- » Avoid even the appearance of anything improper in connection with our Company's business activities.

Who Must Follow Our Code

All employees of Alkegen and its subsidiaries and affiliates ("Company"), including employees (whether full time or part time), officers, and members of our Board of Directors, are required to read, understand, and follow our Code.

Consultants, contractors, agents, suppliers, vendors, distributors, and temporary employees ("business partners") who serve as an extension of Alkegen are also expected to follow the spirit of our Code, our Business Partner Code of Conduct as well as any applicable contractual provisions.

If you supervise our business partners, you are responsible for communicating our standards and ensuring that they are understood. If a business partner fails to meet our ethics and compliance expectations or their related contractual obligations, it may result in the termination of their contract.

Our Code: Guided by a Common Purpose

Complying With Laws and Regulations

Alkegen is committed to compliance with all laws, rules, and regulations that apply to our business. It is impossible to anticipate every question you may have or situation you might face; so, in addition to the Code, Alkegen also has other resources that can be of help. These additional resources are listed throughout the Code. The Code and its principles are also supplemented by more detailed Company policies, which may be found on our intranet. In every situation, we rely on you to use good judgment and seek help when you need it.

We are a global enterprise, so it is important to be aware of different laws and customs that may apply. While we respect the norms of our customers, business partners, and coworkers throughout the world, all employees must, at a minimum, comply with the standards and principles in this Code. If any provision of our Code conflicts with a local law or requirement, you should seek guidance from your manager or supervisor, Human Resources, or a member of the Legal Department.

Accountability and Discipline

Violating our Code, our policies, or the law, or encouraging others to do so, exposes our Company to liability and puts our reputation at risk. If you see or suspect a violation, [report it](#).

Anyone who violates our Code will be subject to disciplinary action, up to and including termination of their employment with Alkegen. You should also understand that violations of laws or regulations may result in legal proceedings and penalties including, in some circumstances, criminal prosecution.

Our Code: Guided by a Common Purpose

Our Responsibilities

Each of us has an obligation to act with integrity, even when this means making difficult choices. Meeting this obligation is what enables us to succeed and grow.

Employee Responsibilities

Every employee has a responsibility to:

- » Act in a professional, honest, and ethical manner when conducting business on behalf of our Company.
- » Know the information in our Code and Company policies, paying particular attention to the topics that apply to your specific job responsibilities.
- » Certify that you have read and will comply with the Code and disclosing any known or suspected violations of our Code.
- » Complete all required employee training in a timely manner and keep up to date on current standards and expectations.
- » Report concerns about possible violations of our Code, our policies, or the law to your manager or supervisor, or any of the resources listed in this Code.
- » Cooperate and tell the truth when responding to an investigation or audit, and never alter or destroy records in response to an investigation or when an investigation is anticipated.

One More Thing ...

We value your feedback. If you have suggestions for ways to enhance our Code, our policies, or our resources to better address a particular issue you have encountered, bring them forward. Promoting an ethical Alkegen is a responsibility we all share.



Our Code: Guided by a Common Purpose

Additional Responsibilities of Managers and Supervisors

Alkegen leaders are expected to meet the following additional responsibilities:

- » Help create a work environment that values mutual respect and open communication.
- » Lead by example. You are expected to exemplify high standards of ethical business conduct.
- » Communicate often with employees and business partners about how the Code and other policies apply to their daily work.
- » Be proactive. Look for opportunities to discuss and address ethical dilemmas and challenging situations with others.
- » Delegate responsibly. Never delegate authority to any individual whom you believe may engage in unlawful conduct or unethical activities.

- » Respond quickly and effectively. When a concern is brought to your attention, ensure that it is treated seriously and with due respect for everyone involved.
- » Be aware of the limits of your authority. Do not take any action that exceeds your authority. If you are ever unsure of what is (or is not) appropriate, discuss the matter with your manager or supervisor, or any of the resources listed in this Code.

Remember: No reason, including the desire to meet business goals, should ever be an excuse for violating our Code, our policies, or the law.

Questions & Answers



I observed misconduct in an area not under my supervision. Am I still required to report the issue?

You are chiefly responsible for employees and business partners under your supervision, but all Alkegen employees are required to report misconduct. As a leader, you are especially obliged to be proactive. The best approach would be to talk first with the manager or supervisor who oversees the area where the problem is occurring, but if this isn't feasible or effective, you should contact another resource described in our Code.

Our Code: Guided by a Common Purpose

Ethical Decision-Making

Making the right decision is not always easy. There may be times when you will be under pressure or unsure of what to do. Always remember that when you have a tough choice to make, you're not alone. There are resources available to help you.



Not Sure What To Do?

It may help to ask yourself:

- Is it legal?
- Is it consistent with our Code and our values?
- Would I feel comfortable if senior management and others at Alkegen knew about it?
- Would I feel comfortable if my decision or my actions were made public?

If the answer to all of these questions is "yes," the decision to move forward is probably OK, but if the answer to any question is "no" or "I'm not sure," stop and seek guidance.

Remember, in any situation, under any circumstances, it is always appropriate to ask for help.

Asking Questions and Reporting Concerns

If you see or suspect any violation of our Code, our policies, or the law, or if you have a question about what to do, talk to your manager or supervisor.

If you're uncomfortable speaking with your manager or supervisor, there are other resources available to help you:

- » Contact your manager or supervisor.
- » Contact a member of Human Resources or the Legal Department.
- » Submit the matter to the Alkegen Compliance Line at: [Alkegen.ethicspoint.com](https://www.alkegen.com/ethicspoint).

Alkegen will make every reasonable attempt to ensure that your concerns are addressed appropriately.

Our Code: Guided by a Common Purpose

What to Expect When You Use the Alkegen Compliance Line

The Compliance Line web portal and phone lines are available 24 hours a day, seven days a week. Trained specialists from an independent third-party provider of corporate compliance services will answer your call, document your concerns, and forward a written report to Alkegen for further investigation.

When you contact the Compliance Line, you may choose to remain anonymous where permitted by local law. All reports received will be treated equally, whether they are submitted anonymously or not.

After you make a report, you will receive an identification number so you can follow up on your concern. Following up is especially important if you have submitted a report anonymously, as we may need additional information in order to conduct an effective investigation. This identification number will also enable you to track the resolution of the case; however, please note that out of respect for privacy, Alkegen will not be able to inform you about individual disciplinary actions.

Any report you make will be kept as confidential as possible by all individuals involved with reviewing and, if necessary, investigating it.

Remember, an issue cannot be addressed unless it is brought to someone's attention.

Questions & Answers



Someone misuses the Compliance Line, makes an anonymous call and falsely accuses someone of wrongdoing.

Experience has shown that the Compliance Line is rarely used inappropriately, but it is important to know that we will follow up on reports, and anyone who uses the Compliance Line in bad faith to spread falsehoods or threaten others, or with the intent to unjustly damage another person's reputation, will be subject to disciplinary action.

Our Code: Guided by a Common Purpose

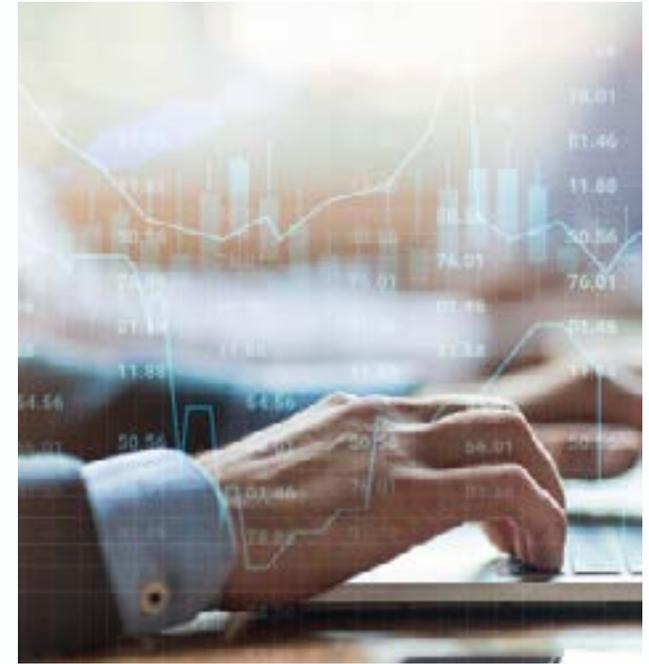
Cooperation With Investigations and Audits

From time to time, employees may be asked to participate in internal and external investigations and audits that are conducted by our Company. All employees are expected to fully cooperate with all such requests and ensure that any information you provide is true, accurate, and complete.

You may also receive inquiries or requests from government officials. If you learn of a potential government investigation or inquiry, immediately notify your manager or supervisor and a member of the Legal Department before taking or promising any action. If you are directed by our Company to respond to a government official's request, extend the same level of cooperation and again, ensure that the information you provide is true, accurate, and complete.

Be Alert To

- » Falsified information. Never destroy, alter, or conceal any document in anticipation of or in response to a request for these documents.
- » Unlawful influence. Never provide or attempt to influence others to provide incomplete, false, or misleading statements to a Company or government investigator.



Our Code: Guided by a Common Purpose

Our Non-Retaliation Policy

We will not tolerate any retaliation against any employee who, in good faith, asks questions, makes a report of actions that may be inconsistent with our Code, our policies, or the law, or who assists in an investigation of suspected wrongdoing.

Reporting “in good faith” means making a genuine attempt to provide honest, complete, and accurate information, even if it later proves to be unsubstantiated or mistaken.

Questions & Answers



I suspect there may be some unethical behavior involving my manager. I know I should report my suspicions, and I'm thinking about using the Compliance Line, but I'm concerned about retaliation. What should I do?

You are required to report misconduct and, in your situation, using the Compliance Line is a good option. We will investigate your suspicions and may need to talk to you to gather additional information. After you make the report, if you believe you are experiencing any retaliation, you should report that as well. We take claims of retaliation seriously. Reports of retaliation will be thoroughly investigated and, if they are true, retaliators will be subject to discipline, up to and including termination of employment.

Want to Know More?



[Anti-Harassment Policy](#)



Promoting a Culture of Inclusion and Respect

Diversity, Equity, and Inclusion

Alkegen helps bring together employees with a wide variety of backgrounds, skills, and cultures. Combining such a wealth of talent and resources creates the diverse and dynamic teams that consistently drive our results.

Our colleagues, job applicants, and business partners are entitled to respect. We are committed to ensuring that they feel welcomed and valued and that they are given opportunities to grow, contribute, and develop with us. To uphold that commitment, we support laws prohibiting discrimination and provide equal opportunity for employment, income, and advancement in all our departments, programs, and worksites.

This means we base employment decisions solely on qualifications, demonstrated skills, and achievements – and never on race, color, religion or belief, sex (including pregnancy, sexual orientation, or gender identity), sexuality, gender reassignment, national or ethnic origin, age, genetic information, marital status, veteran status, disability, or any other characteristic protected by law or Company policy.



Promoting a Culture of Inclusion and Respect

We Do the Right Thing

- » Treat others respectfully and professionally.
- » Promote diversity in hiring and other employment decisions.
- » Do not discriminate against others on the basis of any characteristic protected by law or Company policy.

Be Alert To

- » Comments, jokes, or materials, including emails, which others might consider offensive, even when the direct participant does not find it offensive.
- » Inappropriate bias when judging others. If you supervise others, judge them on performance. Use objective, quantifiable standards and avoid introducing unrelated considerations into your decisions.

Questions & Answers



One of my coworkers sends emails containing jokes and derogatory comments about certain nationalities. These jokes and comments make me uncomfortable, but no one else has spoken up about them. What should I do?

You should notify your manager or supervisor, or a member of Human Resources or the Legal Department. Sending these kinds of jokes violates our values as well as our policies and our standards on diversity, harassment, and discrimination. By doing nothing you are condoning discrimination and tolerating beliefs that can seriously erode the team environment that we have all worked to create.

Want to Know More?



[Equal Employment Opportunities Policy](#)



Promoting a Culture of Inclusion and Respect

Harassment-Free Workplace

We all have the right to work in an environment that is free from intimidation, harassment, bullying, and abusive conduct. Verbal or physical conduct by any employee that harasses another, disrupts another's work performance, or creates an intimidating, offensive, abusive, or hostile work environment will not be tolerated.

Sexual Harassment

A common form of harassment is sexual harassment, which in general occurs when:

- » Actions that are unwelcome are made a condition of employment or used as the basis for employment decisions, such as a request for a date, a sexual favor, or other similar conduct of a sexual nature.
- » An intimidating, offensive, or hostile environment is created by unwelcome advances, insulting jokes, or other offensive verbal or physical behavior of a sexual nature.

We Do the Right Thing

- » Promote a positive attitude toward policies designed to build a safe, ethical, and professional workplace.
- » Help each other by speaking out when a coworker's conduct makes others uncomfortable.
- » Demonstrate professionalism. Do not visit inappropriate internet sites or display sexually explicit or offensive pictures.
- » Report all incidents of harassment and intimidation that may compromise our ability to work together and be productive.

Be Alert To

- » Threatening remarks, obscene phone calls, stalking, or any other form of harassment.
- » Sexual harassment or other unwelcome verbal or physical conduct of a sexual nature.
- » The display of sexually explicit or offensive pictures or other materials.
- » Sexual or offensive jokes or comments (explicit or by innuendo) and leering.
- » Verbal abuse, threats, or taunting.

Want to
Know More?



[Anti-Harassment Policy](#)

Promoting a Culture of Inclusion and Respect

Health and Safety

Ensuring safety is an integral part of everything we do. Each of us is responsible for acting in a way that protects ourselves and others. No matter what job you do or where you do it, we count on every employee to actively promote a safe and healthy workplace, and report any situations that may pose a health, safety, or security risk.

Reporting risks and hazards is not just the right thing to do, it's a requirement, because a failure to speak up about an incident, potential hazard, or to participate in an investigation into an incident, can have serious repercussions for you, for our Company, and for every employee on the job, every day. Do your part to keep everyone in the Alkegen family injury-free.

Alcohol and Drugs

While at work or on Alkegen business:

- » You should be always ready to carry out your work duties – never impaired.
- » Do not use, possess, or be under the influence of illegal drugs or any substance that could interfere with a safe and effective work environment or harm our Company's reputation.

Workplace Violence

Violence of any kind has no place at Alkegen. We won't tolerate:

- » Intimidating, threatening, or hostile behavior.
- » Causing physical injury to another.
- » Acts of vandalism, arson, sabotage, or other criminal activities.
- » The carrying of firearms or other weapons onto Company property.



Promoting a Culture of Inclusion and Respect

We Do the Right Thing

- » Follow the safety, security, and health rules and practices that apply to your job.
- » Maintain a neat, safe working environment by keeping work-stations, aisles, and other work-spaces free from obstacles, wires, and other potential hazards.
- » Notify your manager or supervisor immediately about any unsafe equipment or any situation that could pose a threat to health or safety or damage the environment. As an employee, you have the right and the responsibility to stop any work if you feel your safety is at risk.
- » Cooperate with any investigations into incidents.

Be Alert To

- » Unsafe practices or work conditions.
- » Carelessness in enforcing security standards, such as facility entry procedures and password protocols.

Questions & Answers



I've noticed some practices in my area that don't seem safe. Is there someone I can speak to? I'm new here and don't want to be considered a troublemaker.

Discuss your concerns with your manager or supervisor or a member of Human Resources or the Legal Department. There may be very good reasons for the practices, but it's important to remember that raising a concern about safety does not make you a troublemaker. It makes you a responsible employee concerned about the safety of others.

Want to Know More?



[Substance Abuse Policy](#)

[Workplace Violence Policy](#)



Human Rights

We conduct our business in a manner that respects the human rights and dignity of all, and we support international efforts to promote and protect human rights, including an absolute opposition to child labor, slavery, and human trafficking.

We provide our employees with a safe place to work and fair and competitive pay and benefits. Our wages meet or exceed local market conditions and ensure an adequate standard of living for our employees and their families. Our pay systems are linked to Company and individual performance.

Each of us can help support efforts to eliminate abuses such as child labor, slavery, human trafficking, and forced labor.

We Do the Right Thing

- » Report any suspicion or evidence of human rights abuses in our operations or in the operations of our business partners.
- » Remember that respect for human dignity begins with our daily interactions with one another, our business partners, and our customers. It includes promoting diversity and doing our part to protect the rights and dignity of everyone with whom we do business.

Questions & Answers



When I was visiting a new supplier, I noticed employees working there who seemed underage. When I asked about it, I didn't get a clear answer. What are my next steps?

You did the right thing by being alert to human rights abuse and raising the issue with our supplier. The next step is to report the incident to a manager or supervisor, or a member of Human Resources or the Legal Department. We are committed to human rights and to the elimination of human rights abuses including child labor.

Building a Better World

Environmental Stewardship and Sustainability

We recognize our environmental and societal responsibilities. Through our collective efforts, including our Product Stewardship and Environmental programs, we are committed to sustainability and to minimizing damage to the environment as well as any potential harm to the health and safety of employees, customers, and the public. Alkegen is committed to proactive efforts that promote sustainable manufacturing and reduce our overall carbon footprint.

We Do the Right Thing

- » Protect employee safety and the environment. Operate in full compliance with all applicable environmental, health, and safety laws and regulations.
- » Read and understand all the information provided by our Company that is relevant to your job and the health, safety, and environmental effects of our operations.
- » Stop work and report any situation that you believe could result in an unsafe working condition or damage to the environment.
- » Be proactive and look for ways that we can minimize waste, energy, and use of natural resources.

Contact a manager or supervisor, or a member of Human Resources or the Legal Department if you have any questions about compliance with environmental, health, and safety laws and policies.

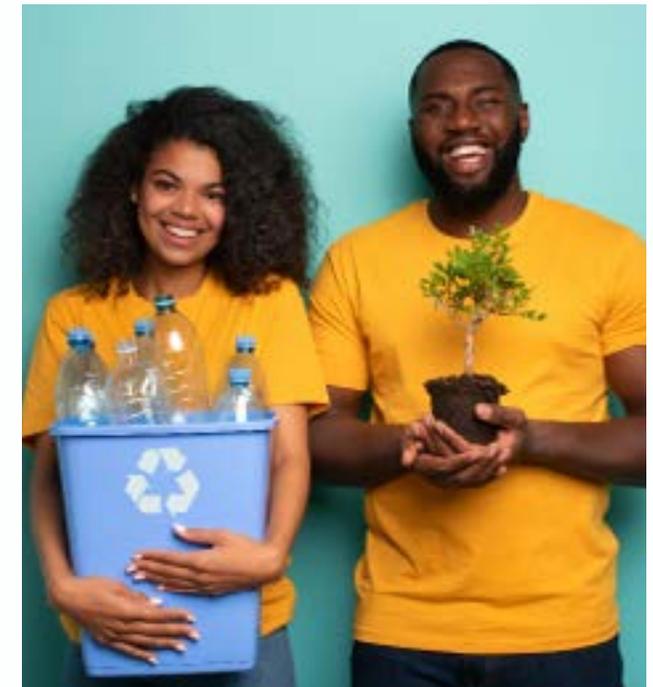
Want to Know More?



[Health and Safety Policy](#)

[Environmental Policy](#)

[Product Stewardship](#)



Building a Better World

Corporate Social Responsibility

Civic responsibility is an integral part of the Alkegen culture. We believe in engaging responsibly in charitable and philanthropic activities to make a positive impact in the communities where we live and work. As a company, we contribute funds, time, and talent to support Company-wide programs and local causes. You are encouraged – but not required – to get involved in the many initiatives Alkegen supports.

Charitable and Political Activities

Alkegen encourages you to support charitable and civic causes that are personally important to you. If you do participate as an individual, offer your support independently – not in Alkegen's name. Never pressure colleagues to participate or use Company funds, time, resources, or the Alkegen name to support your activities without prior approval.

Each of us also has the right to voluntarily participate in the political process, including making personal political contributions. However, you must always make it clear that your personal views and actions are not those of Alkegen, and never use Company funds, time, or the Alkegen name for any political purpose without proper authorization.



Building a Better World

We Do the Right Thing

- » Ensure that your personal political views and activities are not viewed as those of the Company.
- » Do not use our resources or facilities to support your personal political activities.
- » Follow all federal, state, local, and foreign election laws, rules, and regulations as they relate to Company contributions or expenditures.

Be Alert To

- » Lobbying. Interactions with government officials or regulators that could be seen as lobbying must be discussed in advance and coordinated with the Legal Department.
- » Pressure. Never apply direct or indirect pressure on another employee to contribute to, support, or oppose any political candidate or party.
- » Improper influence. Avoid even the appearance of making political or charitable contributions in order to gain favor or in an attempt to exert improper influence.
- » Conflicts of interest. Holding or campaigning for political office must not create, or appear to create, a conflict of interest with your duties at Alkegen.

Questions & Answers



I have been asked if Alkegen would donate to a local political party. It is not for a specific candidate, but the mayor is a member of the party, and he has been very supportive of our Company in the past. Would it be OK to make that donation?

No. Please refer any requests for political donations to the Legal Department. We do not take part in any partisan political causes or activities, including making financial contributions or offering the use of Company supplies, facilities, or equipment.

Want to Know More?



[Ethical Standards and Conflicts of Interest Policy](#)

Anti-Corruption and Anti-Bribery

We believe that all forms of bribery and other corrupt practices are an inappropriate way to conduct business regardless of local customs. Alkegen is committed to complying with all applicable anti-corruption laws.

We do not pay or accept bribes or kickbacks, at any time for any reason. This applies equally to any person or organization that represents our Company.

It is especially important that we exercise due diligence and carefully monitor third parties (such as non-employee sales representatives) acting on our behalf. We carefully screen all business partners who work on our behalf, particularly when dealing in countries with high corruption rates and in any situations where “red flags” would indicate further screening is needed before retaining the business partner. Our partners must understand that they are required to operate in strict compliance with our standards and to maintain accurate records of all transactions. We never ask them to do something that we are prohibited from doing ourselves.

Commissions, consultants’ fees, retainers, or similar payments must be clearly related to, and commensurate with, the services being performed. No other payments, loans, commissions, or other favors should be made or accepted because they could be viewed as an improper inducement.

Key Definitions

Bribery means giving or receiving anything of value (or offering to do so) in order to obtain a business, financial, or commercial advantage.

Corruption is the abuse of an entrusted power for private gain.

Facilitation payments are typically small payments made to a low-level government official that are intended to expedite or encourage the official to perform their responsibilities.

Government officials include government employees, political parties, candidates for office, employees of public organizations, and government-owned entities.

Following the Law

We Do the Right Thing

- » Understand the standards set forth under anti-bribery laws which apply to your role at Alkegen.
- » Never give anything of value inconsistent with local laws and regulations to any government official. If you are not sure of the local laws, the safest course of action is to not give anything of value.
- » Know and comply with our [gifts and entertainment policies](#).
- » Immediately report any request for a facilitation payment to a member of the Legal Department – all facilitation payments are prohibited by Alkegen.
- » Accurately and completely record all payments to third parties.

Be Alert To

- » Apparent violations of anti-bribery laws by our business partners.
- » Agents who do not wish to have all terms of their engagement with Alkegen clearly documented in writing.

Questions & Answers



I work with a foreign agent in connection with our operations in another country. I suspect that some of the money we pay this agent goes toward making payments or bribes to government officials. What should I do?

This matter should be reported to the Legal Department for investigation. If there is bribery and we fail to act, both you and our Company could be liable. While investigating these kinds of matters can be culturally difficult in some countries, any agent doing business with us should understand the necessity of these measures. It is important and appropriate to remind our agents of this policy.

Want to Know More?



[Anti-Bribery and Corruption Policy](#)

Following the Law

Global Trade Compliance

Alkegen has global operations that support a growing, worldwide customer base. To maintain and grow our global standing, we must strictly comply with all applicable laws that govern the import, export, and re-export of our products, and also with the laws of the countries where our products are manufactured, repaired, or used. Any violation of these laws, even through ignorance, could have damaging and long-lasting effects on our business.

If your responsibilities include exporting products or receiving imported products, you are responsible for screening customers, suppliers, and transactions to ensure that we comply with all applicable export and import requirements.

We Do the Right Thing

- » Obtain all necessary licenses before the export or re-export of products, services, or technology.
- » Be aware that some countries in which we conduct business may have sanctions or embargoes in place – make sure you know and comply with any relevant restrictions.
- » Report complete, accurate, and detailed information regarding every imported product, including its place(s) of manufacture and its full cost.
- » Direct any questions you have regarding imports or exports of our products, parts, or technology to a member of the Legal Department.

**Want to
Know More?**



[Exports Policy](#)



Antitrust and Fair Competition

We believe in free and open competition and never engage in practices that may limit competition or try to gain competitive advantages through unethical or illegal business practices. Antitrust laws are complex and compliance requirements can vary depending on the circumstances, so seek help with any questions about what is appropriate and what isn't.



Warning Signs

In general, the following activities are red flags and should be avoided and, if detected, reported to a member of the Legal Department:

- » Sharing our Company's competitively sensitive information with a competitor.
- » Sharing competitively sensitive information of business partners or other third parties with their competitors.
- » Attempting to obtain nonpublic information about competitors from new hires or candidates for employment.

We Do the Right Thing

- » Comply with all antitrust and competition laws and seek help if you have questions about what is permitted as violations can have severe consequences for you and for our Company.
- » Do not enter into agreements with competitors or others to engage in any anti-competitive behavior, including setting prices or dividing up customers, suppliers, or markets.
- » Do not engage in conversations with competitors about competitively sensitive information.

Following the Law

Be Alert To

- » **Collusion** – when companies secretly communicate or agree on how they will compete. This could include agreements or exchanges of information on pricing, terms, wages, or allocations of markets.
- » **Bid-rigging** – when competitors or service providers manipulate bidding so that fair competition is limited. This may include comparing bids, agreeing to refrain from bidding, or knowingly submitting noncompetitive bids.
- » **Tying** – when a company with market power forces customers to agree to services or products that they do not want or need.
- » **Predatory pricing** – when a company with market power sells a service below cost to eliminate or harm a competitor, with the intent to recover the loss of revenue later by raising prices after the competitor has been eliminated or harmed.



Questions & Answers



I attended a trade show association meeting and someone in the group said, “The marketplace is putting pressure on pricing in our industry. Just the other day, a customer said our competitors were dropping their prices by 20% – have you dropped your prices?” I happened to receive a phone call and immediately left the room, but what should I do if that happens again?

You should make it clear to everyone in the meeting that conversations about competitively sensitive topics such as pricing are inappropriate and, after doing so, immediately leave the meeting and contact a member of the Legal Department to report the incident.

Following the Law

Gathering Competitive Intelligence

Information about competitors is a valuable asset in today's competitive business environment, but in collecting business intelligence, you and others working on our behalf, must always live up to the highest ethical standards. Obtain competitive information only through legal and ethical means, never through fraud, misrepresentation, deception, or the use of technology to "spy" on others. Sharing competitively sensitive information with competitors (whether that information belongs to us or our business partners) is always prohibited.

We Do the Right Thing

- » Be careful when accepting information from third parties. You should know and trust their sources and be sure that the information they provide is not protected by trade secret laws, nondisclosure, or confidentiality agreements.
- » Respect the obligations of others to keep competitive information confidential, including former employees of competitors, who are obligated not to use or disclose their former employer's confidential information.
- » While Alkegen may employ former employees of competitors, recognize and respect the obligations of those employees not to use or disclose the confidential information of their former employers.

Be Alert To

- » Retaining papers or computer records from prior employers in violation of laws or contracts.
- » Using anyone else's confidential information without appropriate approvals.
- » Using job interviews as a way of collecting confidential information about competitors or others.
- » Receiving suggestions from third parties for new products, product features, or services when the source of the original idea is not fully known.

Questions & Answers



I received sensitive pricing information from one of our competitors. What should I do?

You should contact a member of the Legal Department without delay and before any further action is taken. It is important, from the moment we receive such information, that we demonstrate respect for antitrust laws, and we make it clear that we expect others to do the same. This requires appropriate action that can only be decided on a case-to-case basis and may include sending a letter to the competitor.

Want to Know More?



[Antitrust and Trade Regulations Policy](#)

Acting Like an Owner

Fair Dealing

We treat our customers and business partners fairly. We work to understand and meet their needs and seek competitive advantages through superior performance, never through unethical or illegal practices. We tell the truth about our services and capabilities and never make claims that aren't true. In short, we treat our customers and business partners as we would like to be treated.

We Do the Right Thing

- » Be responsive to customer requests and questions. Only promise what you can deliver and deliver on what you promise.
- » Never take unfair advantage of anyone by manipulating, concealing, misrepresenting material facts, abusing privileged information, or any other unfair dealing practice.

- » Don't disparage our competitors.
- » Never grant a customer's request to do something that you regard as unethical or unlawful.
- » Speak with your manager or supervisor if you have concerns about any error, omission, undue delay, or defect in quality or our customer service.

Be Alert To

- » Pressure from colleagues or leaders to cut corners on quality or delivery standards.
- » Temptations to tell customers what you think they want to hear rather than the truth; if a situation is unclear, begin by presenting a fair and accurate picture as a basis for decision-making.



Acting Like an Owner

Conflicts of Interest

A conflict of interest can occur whenever you and/or your family have a competing interest or activity that may interfere with your ability to make an objective decision on behalf of Alkegen. Each of us is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict, because the perception of a conflict can undermine the trust others place in us and damage our reputation.

Conflicts of interest may be actual, potential, or even just a matter of perception. Since these situations are not always clear-cut, you need to fully disclose them to your manager or supervisor so that they can be properly evaluated, monitored, and managed.

Be Alert

There are certain situations where conflicts of interest typically arise, including the following:

Corporate opportunities

If you learn about a business opportunity because of your job, it belongs to Alkegen first. This means that you should not take that opportunity for yourself unless you get approval from a member of the Legal Department.

Personal relationships

On occasion, it is possible that you may find yourself in a situation where you are working with a close friend, romantic partner, or relative who works for a customer, business partner, competitor, or even our Company. Since it is impossible to anticipate every scenario that could create a potential conflict, you should disclose to your manager or supervisor any personal relationship in the workplace to determine if any precautions need to be taken.

Outside employment

To ensure that there are no conflicts and that potential issues are addressed, you must disclose and discuss employment outside of Alkegen with your manager or supervisor. If approved, you must ensure that the outside activity does not interfere with your work at Alkegen. Working for a competitor, business partner, or customer may raise conflicts that will need to be resolved. Also, any approved side or personal business should not compete with Alkegen.

Personal investments

A conflict can occur if you have a significant ownership or other financial interest in a competitor, business partner, or customer. Accepting or granting loans from Alkegen can also present a conflict of interest. Make sure you know what's permitted – and what's not – by our policies and seek help with any questions.

Civic activities

Unless Company management specifically asks you to do so, you shouldn't accept a seat on the board of directors or advisory board of any of our competitors, business partners, or customers, especially if your current job gives you the ability to influence our relationship with them.

Offers of [gifts and entertainment](#) can also present a conflict of interest if they fall outside the bounds of our policies.

We Do the Right Thing

- » Avoid conflict of interest situations whenever possible.
- » Always make business decisions in the best interest of Alkegen.
- » Think ahead and proactively address situations that may put your interests or those of a family member in potential conflict with Alkegen.
- » Discuss with your manager or supervisor full details of any situation that could be perceived as a potential conflict of interest.

Want to Know More?



[Ethical Standards and Conflicts of Interest Policy](#)

Acting Like an Owner

Gifts and Entertainment

A modest gift may be a thoughtful “thank you,” or a meal may offer an opportunity to discuss business. If not handled carefully, however, the exchange of gifts and entertainment could be improper or create a conflict of interest. This is especially true if an offer is extended frequently, or if the value is large enough that someone may think it is being offered in an attempt to influence a business decision.

Only offer and accept business gifts and entertainment that comply with our policies and make sure that anything given or received is accurately reported in our books and records.

Strict Rules Apply to Government Officials

Be aware that the rules for what we may give to – or accept from – government officials are much more strict. Don't offer anything of any value to a government official without obtaining approval, in advance, from the Legal Department. And remember: We do not accept or provide gifts, favors, or entertainment to anyone – even if it complies with our policies – if the intent is to improperly influence a decision.



Acting Like an Owner

We Do the Right Thing

- » Only provide and accept business gifts and entertainment that are customary business courtesies and reasonable in value and frequency.
- » Make sure any offer is:
 - ◇ Given and received openly, transparently, and in good faith.
 - ◇ Consistent with local custom and practice when it comes to the type and value of the business gift, the manner in which it's exchanged, and the status of the donor and recipient.
 - ◇ Tasteful and in line with widely accepted standards of professional courtesy and social norms.
 - ◇ Considered, under Alkegen policies, to be an Insignificant Item.
 - ◇ Disclosed and approved in advance, when required .
- » Never give or accept cash or cash equivalents.
- » Do not request or solicit gifts, favors, entertainment, or services.
- » Raise a concern whenever you suspect that a colleague or business partner may be improperly attempting to influence a decision of a customer or government official.

Be Alert To

- » Situations that could embarrass you or our Company (e.g., entertainment at sexually oriented establishments).
- » Gifts, favors, or entertainment that may be reasonable for a privately owned company but not for a government official or agency.

Questions & Answers



A vendor invited my spouse and me to join them at the World Cup for an all-expense-paid weekend. I think it would be a good way to promote our working relationship – may I accept the invitation?

No. We must avoid even the appearance of something improper. Gifts should never be given or accepted if their value is more than nominal or could be considered extravagant. The World Cup weekend extended to you by our vendor is lavish and could suggest an attempt to win Alkegen business. If you participate in any way, the expense must be paid for by you. Consult with your manager or supervisor or a member of the Legal Department before responding to the offer.

Want to Know More?



[Ethical Standards and Conflicts of Interest Policy](#)

Acting Like an Owner

Sourcing Responsibly

Alkegen evaluates and engages with qualified business partners on an objective basis grounded in fairness. When selecting partners, we assess their ability to satisfy our business and technical needs and requirements.

All agreements are negotiated in good faith and must be fair and reasonable for both parties. Do your part to hold our business partners to our high standards and ensure they operate ethically, in compliance with the law, and in a way that's consistent with our Code, our policies, and our values.

Product Quality and Safety

We are dedicated to earning and maintaining the trust of our customers by ensuring the quality, safety, and performance of our products. Each of us, as well as our business partners, are expected to meet all product quality and safety specifications and our customers' and product users' expectations.

We Do the Right Thing

- » Adhere to the highest standards and never take shortcuts or make exceptions that could compromise the quality or safety of our products.
- » Do your part to ensure complete and accurate quality testing and performance reporting.
- » Routinely check equipment and processes to ensure they conform to specifications and expectations – work toward continuous improvement.
- » If you believe there is a safety issue or defect that might endanger a customer, report the issue to your manager or supervisor immediately.

Questions & Answers



I think there may be an issue with one of the manufacturing processes at my facility, but we are behind schedule and if I say anything, we will be delayed further as the Company investigates. What should I do?

Alkegen never sacrifices quality to meet a Company deadline or target. You should report the matter immediately.



Protecting Assets and Information

Our Company Assets

Each of us is entrusted with Company assets – the resources we own (whether tangible or intangible) that enable us to operate. We are responsible for using them with care and protecting them from fraud, waste, and abuse. Personal use of Company assets is discouraged, but where permitted, should be kept to a minimum and have no adverse effect on productivity and the work environment.

Physical and Electronic Assets

Physical assets include Alkegen facilities, materials, and equipment. Electronic assets include computer and communication systems, software, and hardware. Files and records are also Company assets, and we have a responsibility to ensure their confidentiality, security, and integrity.

Be aware that any information you create, share, or download onto Company systems belongs to Alkegen, and we have the right to review and monitor system use at any time, without notifying you, to the extent permitted by law.

We Do the Right Thing

- » Use Company assets to carry out your job responsibilities, never for personal gain or for activities that are improper or illegal.
- » Make sure all Company-related business transactions are authorized by management and comply with delegations of signature authority and processes for internal review and approval.
- » Observe good physical security practices, especially those related to badging in and out of our facilities.
- » Be a good steward of our electronic resources and systems, and practice good cybersecurity:
 - ◇ Do not share passwords or allow other people, including friends and family, to use Alkegen resources.
 - ◇ Only use software that has been properly licensed. The copying or use of unlicensed or “pirated” software on Company computers or other equipment is strictly prohibited. If you have any questions about whether or not a particular use of software is licensed, contact a member of the Intellectual Property (“IP”) Department.
 - ◇ Lock your work-station when you step away and log off our systems when you complete your work for the day.
 - ◇ Beware of phishing attempts – use caution in opening email attachments from unknown senders or clicking on suspicious links.

Be Alert To

- » Requests to borrow or use Alkegen equipment without approval.
- » Excessive use of Alkegen resources for personal purposes.
- » Unknown individuals without proper credentials entering our facilities.



Protecting Assets and Information

Questions & Answers



I'm concerned that my supervisor may be stealing from the Company. I'm not sure, and I don't want to accuse anyone falsely. Should I say something about my suspicions? I don't want to lose my job if I'm mistaken.

You should report your concerns to any member of management or the Legal Department or contact the Compliance Line. You may remain anonymous if you wish. Alkegen will investigate your concern, gather any supporting evidence, and take appropriate action. As a company, we prohibit all forms of retaliation and are committed to providing a safe reporting environment – when you raise a concern in good faith to protect the Company, you, in turn, are protected.

Want to Know More?



[Ethical Standards and Conflicts of Interest Policy](#)

Accurate Recordkeeping

The accuracy and completeness of our disclosures and business records are essential to making informed decisions and supporting investors, regulators, and others. Our books and records must accurately and fairly reflect our transactions in sufficient detail and in accordance with applicable law, accepted accounting principles, and our internal policies and procedures.

Some employees have special responsibilities in this area, but all of us contribute to the process of recording business results or maintaining records. Ensure that the information we record is accurate, timely, complete, and maintained in a manner that is consistent with our internal controls, disclosure controls, and legal obligations.

Records Management

Documents should only be disposed of in compliance with Alkegen policies and should never be destroyed or hidden. You must never conceal wrongdoing or permit others to do so. Never destroy documents in response to – or in anticipation of – an investigation or audit.

If you have any questions or concerns about retaining or destroying corporate records, please contact a member of the Legal Department.

Protecting Assets and Information

We Do the Right Thing

- » Completely and accurately record all assets, liabilities, revenues, expenses, and business transactions.
- » Write carefully in all of your business communications. Write as though someday the records you create may become public documents.
- » Make sure all Company-related business transactions are authorized by management and comply with delegations of signature authority and our processes for internal review and approval.

Be Alert To

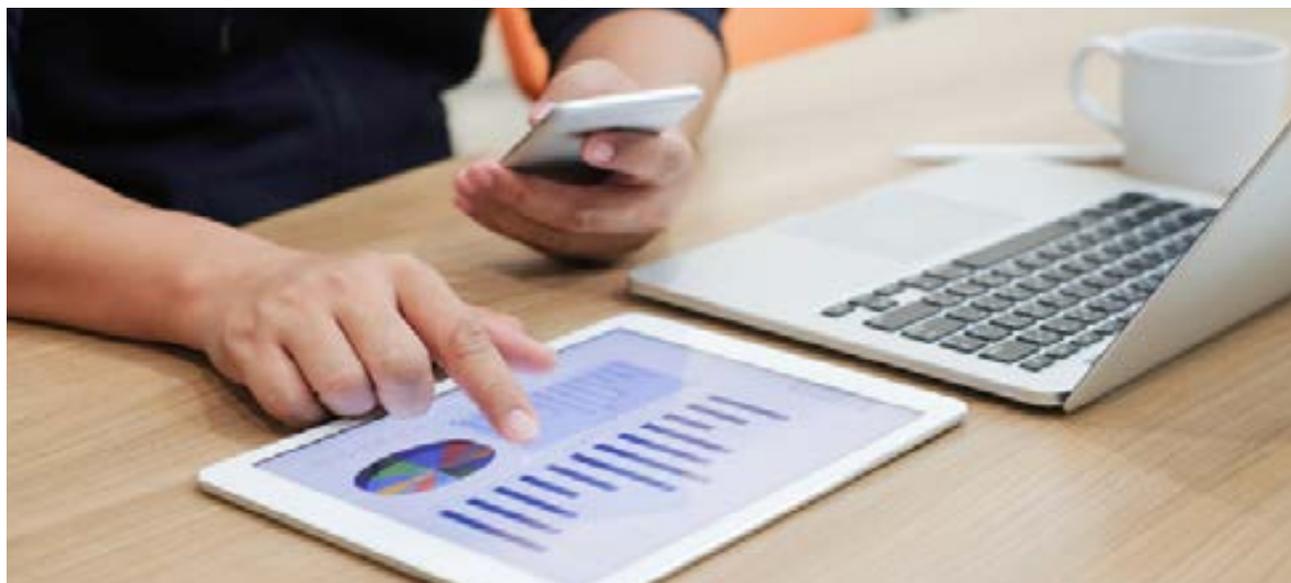
- » Records that are not clear and complete or that obscure the true nature of any action.
- » Undisclosed or unrecorded funds, assets, or liabilities.
- » Improper destruction of documents.
- » Suspicious financial transactions (such as large cash payments) that may signal money laundering or other financial crimes.

Questions & Answers



At the end of the last quarter reporting period, my supervisor asked me to record additional expenses, even though I had not yet received the invoices from the supplier and the work has not yet started. I agreed to do it, since we were all sure that the work would be completed in the next quarter. Now I wonder if I did the right thing.

No, you didn't. Costs must be recorded in the period in which they are incurred. The work was not started, and the costs were not incurred by the date you recorded the transaction. It was therefore a misrepresentation and, depending on the circumstances, could amount to fraud.



Protecting Assets and Information

Confidential Information and Intellectual Property

Alkegen relies on each of us to be vigilant and protect confidential information and intellectual property – some of our most important and valuable assets. This means keeping it secure, limiting access to those who have a need to know in order to do their job, and only using it for authorized purposes.

Be aware that your obligation to restrict your use of Alkegen confidential information and intellectual property continues even after your employment ends.

Intellectual Property

Examples of intellectual property (IP) include:

- » Business and marketing plans
- » Company initiatives (existing, planned, proposed, or developing)
- » Customer lists
- » Trade secrets and discoveries
- » Methods, know-how, and techniques
- » Innovations and designs
- » Systems, software, and technology
- » Patents, trademarks, and copyrights

Alkegen commits substantial resources to technology development and innovation, and the creation and protection of our intellectual property rights are critical to our business. Contact the Legal Department if you receive questions regarding:

- » The scope of intellectual property rights
- » The applicability of Alkegen rights to another company's products
- » The applicability of a third party's intellectual property rights to Alkegen intellectual property rights or products

Protecting Assets and Information

We Do the Right Thing

- » Promptly disclose to Company management any inventions or other IP that you create while you are employed by Alkegen.
- » Properly label confidential information to indicate how it should be handled, distributed, and destroyed.
- » Use and disclose confidential information only for legitimate business purposes.
- » Protect our intellectual property and confidential information by sharing it only with authorized parties. Make sure any third party who requires access to confidential information has signed a confidentiality agreement.
- » Only store or communicate Company information using Alkegen information systems.

Be Alert To

- » Discussions of Alkegen confidential information in places where others might be able to overhear – for example on planes and elevators and when using phones.
- » Sending confidential information to unattended fax machines or printers.

Our customers and business partners place their trust in us. We must protect their confidential information just as we protect our own.

We Do the Right Thing

- » Understand the expectations of customers and business partners regarding the protection, use, and disclosure of the confidential information that they provide to us.
- » Limit any access to third-party confidential information to those persons who have a need to know in order to do their job, and only for authorized purposes.
- » Immediately report any loss or theft of confidential information to your manager or supervisor.

Be Alert To

- » Requests by business partners for confidential information about our customers or about other business partners if there is no associated business requirement or authorization.
- » Unintentional exposure of confidential information about our customers or business partners in public settings or through unsecure networks.

Questions & Answers



My new coworker used to work for one of our competitors. Can we talk about some of the marketing strategies used by that company?

No. The marketing strategies of a former employer are proprietary and confidential, and your coworker has an obligation to protect them, even after leaving the company. Remember, you have an obligation to protect the confidential business information of Alkegen, too, should you ever leave and work elsewhere.

Protecting Assets and Information

Data Privacy

We respect the personal information of others. Follow our policies and all applicable laws and regulations in collecting, accessing, using, storing, sharing, and disposing of sensitive information. Only use it – and share it with others outside of Alkegen – for legitimate business purposes.

Make sure you know the kind of information that is considered personal information. It includes anything that could be used to identify someone, either directly or indirectly, such as a name, email address, phone number, or credit card number.

Be Alert To

- » Failing to shred or securely dispose of sensitive information.
- » Using “free” or individually purchased internet hosting, collaboration, or cloud services that could put personal information at risk.

Want to
Know More?



[Data Protection Policy](#)



Where to Go for Help

In the event that you need help interpreting or applying the Code, please contact your manager or supervisor, a member of Human Resources, or a member of Legal Services. The Compliance Line is also always available 24 hours a day at: alkegen.ethicspoint.com.

Waivers and Changes to the Code

On rare occasions, limited waivers of the Code may be necessary. The Chief Executive Officer may waive, in writing, specific application of the Code for employees other than executive officers and directors, provided that such waivers are reported promptly to the Board of Directors. The Code and its principles are supplemented by Company policies, which can be found on our Company's intranet.