

J.M. Huber Corporation Code of Ethics

J.M. Huber Corporation's ("Huber") reputation and business performance depend on the integrity of our employees' individual actions and decisions. The trust our customers, shareholders and communities place in Huber is an invaluable asset.



Renewable Energy

Huber is committed to reducing our dependency on finite natural resources and reducing our impact on



Gifts & Business Courtesies

Huber is committed to competing solely on the merit of our products and services. Employees should avoid any actions that create a perception that favorable treatment of outside entities by Huber was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from or for persons or companies with whom Huber does or may do business. Huber will neither give nor accept business courtesies that constitute—or could reasonably be perceived as constituting—unfair business inducements that would violate law, regulation or policies of Huber or our customers, or would cause embarrassment or reflect negatively on Huber's reputation.

Intellectual Assets

Huber's intellectual property rights (our trademarks, logos, copyrights, trade secrets, "know-how" and patents) are among our most valuable assets. Unauthorized use can lead to a serious or complete loss of value. Employees must respect all copyright and other intellectual property laws, laws governing the fair use of copyrights, trademarks and other intellectual property. Current and former employees as well as third parties are required to report any actual or potential violations of trademarks, logos or other intellectual property to Huber's Legal department.

Likewise, employees should respect the intellectual property rights of others. Inappropriate use of others' intellectual property may expose Huber and the employee to criminal and civil fines and penalties. Employees must have proper approval and agreements for preserving confidentiality from Huber's Legal department before soliciting, accepting or using non-public proprietary information from individuals outside the Company, or letting them use or have access to Huber proprietary information.

Huber's Property

Huber's property must only be used for Huber's business. It may not be used for competing purposes or in any other inappropriate manner that risks damaging Huber. Huber's property may not be used for the personal gain of an employee, or that of their relatives or friends. Equipment that Huber provides to employees remains Huber's property and must be looked after accordingly.

Confidentiality

Huber's communication must be open, correct, transparent and easily accessible, as well as comply with legal requirements and commercial confidentiality. Non-public information on Huber's financial condition, operations, customers or suppliers must be protected by Huber employees from unauthorized use and dissemination in compliance with the Company Information Protection policy. Huber employees must protect such information from unauthorized use and dissemination in compliance with Company confidentiality policies.

Reporting of Suspected Unethical or Illegal Behavior

We encourage our employees to report promptly, in good faith and in accordance with this Code, any reasonably suspected violation of any of the follo



EXCELLENCE

Product Responsibility

Huber's success depends upon the quality and safety of our products supplied to our valued customers all over the world. Huber will manufacture and supply the highest quality of products, ingredients and solutions to our customers, and do so in compliance with all applicable product specifications, regulatory and product safety standards.

Sustainable Capital Investment

Huber's Sustainability Strategy centers on a Triple Bottom Line approach that balances People, Planet & Profit considerations when making business decisions. As such, capital investment is preferentially deployed to projects with Triple Bottom Line benefits. Objectives related to sustainable capital deployment are established and reported annually.

Sustainable Supply Chain

Huber partners with socially and environmentally responsible suppliers. Huber requires that suppliers of goods and services take ethical, human rights, labor, energy and environmental aspects into account in their business activities.

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Freedom of Association

Huber respects employees' right to join, form or not to join a labor union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, Huber strives to establish a constructive dialogue with their freely chosen representatives and bargain in good faith with such representatives.

Political Activity

Huber recognizes the personal right of our employees to participate in political activity. Huber employees may publicly support or oppose any political party, candid(0f)3.6 (2s)4 (e)06F (ee)6.1 (s)4 (3r)-1.4 (e)6.2 (o)0.6 (0/MCID 1





