



EXTERNAL BUSINESS PARTNER (EBP) STEWARDSHIP OVERVIEW

CONTENTS

OBJECTIVES

POLICIES/
EXPECTATIONS/
GUIDELINES

5 GLOBAL
SOURCING PRINCIPLES

EXPECTATIONS/
GUIDELINES FOR
EXTERNAL PARTNERS

OTHER SERVICE
SPECIFIC
EXPECTATIONS/
GUIDELINES

CLOSING

1 OF 19 >

ChemWhat

CONTENTS

Objectives / Overview	3
Policies / Expectations / Guidelines	5
5 Global Sourcing Principles	6
Expectations / Guidelines for All External Business Partners	7
Other Service Specific Expectations / Guidelines	17
Closing	19

OBJECTIVES – WHAT THIS OVERVIEW IS



- As an external partner, whether you are providing materials, finished products or services, the following core expectations and guidelines can help quickly **equip you to become a successful partner to ChemWhat.**
- Worldwide Business Conduct Manual explains global standards that ChemWhat employees must follow at all times. ChemWhat also expects external parties with whom ChemWhat does business to **follow standards equivalent to its Worldwide Business Conduct Manual.**
- We take ethical conduct and legal compliance very seriously. The intent behind this summary of core expectations /guidelines is to **clearly communicate ChemWhat's standards among its external partners.**
- While we hope and expect that external parties share ChemWhat's commitment to ethical conduct, **deviations from these expectations may result in termination of business** among other remedies consistent with contractual rights and applicable law.

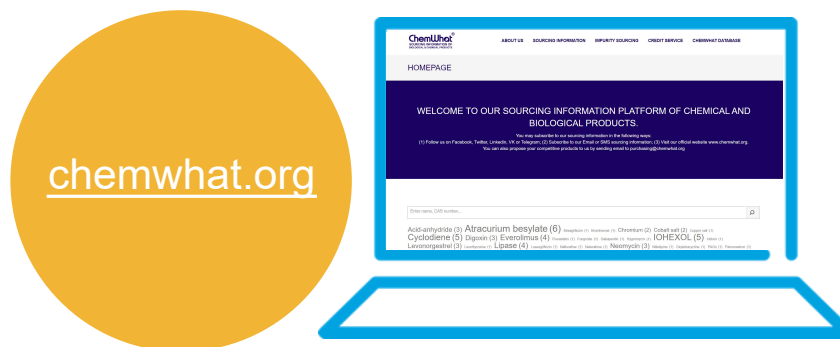
NOT OBJECTIVES – WHAT THIS OVERVIEW IS NOT



- Providing these reference document **does not change your contract with ChemWhat**, the employment status of your workers, or the requirement that external parties alone train, manage, and supervise their own employees.
- Though we expect you to demonstrate the same commitment to governance and stewardship with comparable high standards, it remains **your responsibility to ensure compliance** with contract terms, applicable law, and ethical business practices.
- As you manage the policies and controls within your own organization, **you are responsible to identify and mitigate risks** particular to your industry, geography, workforce, and any allowed sub-vendors consistent with these general expectations.

POLICIES / EXPECTATIONS / GUIDELINES

- ChemWhat's policy is to **operate within the spirit and letter of the law and to maintain high ethical standards** wherever we conduct business. ChemWhat does not condone or tolerate efforts or activities to achieve results through illegal or unethical dealings anywhere in the world.
- ChemWhat's external business partners know that **the Company is concerned not only with results, but also with how those results are achieved**. We expect all off our external business partners to conduct their business with the same high standards. We will actively seek business relationships with external business partners who share our values and promote the application of these high standards among those with whom they do business.



5

GLOBAL SOURCING PRINCIPLES

These five principles establish a foundation for our discipline and serve as guidelines in our daily activities as we interact with EBPs.

1

BEST TOTAL VALUE

We make sourcing decisions on the basis of best total value offered to supply our requirements for goods and services.

2

HONEST, ETHICAL AND FAIR DEALINGS

We treat all suppliers with respect and deal with them honestly, ethically, and fairly.

3

EXTERNALLY LINKED SUPPLY SOLUTIONS

We deliver solutions that meet ChemWhat business needs by bringing the Company's deep supply and market knowledge and access to supplier competencies, resources, and relationships around the globe.

4

COMPETITION AND COLLABORATION

We apply the strategic use of competition, collaboration or a blend of the two in our approach towards managing our supplier relationships

5

SUPPLIER INCUMBENCY

We prefer ongoing relationships with incumbent suppliers because we believe they deliver lower long-term costs and higher value to our business.

WORLDWIDE BUSINESS CONDUCT MANUAL

- Worldwide Business Conduct Manual (WBCM) is the summary of our Purpose, Values and Principles (PVPs) that are the foundation of everything we do at ChemWhat.
- The WBCM Includes guidelines related to:
 - Conflict of Interest,
 - Anti-Corruption,
 - Global Social Media, and
 - Competitive Information Collectionamong others.



WBCM

CONFLICT OF INTEREST

- An actual or personal conflict of interest can arise when a ChemWhat employee has an **undisclosed personal relationship** with an external business partner, when such ChemWhat employee has direct or indirect decision-making authority or influence over the business relationship.
 - Similar conflicts can arise between your company and sub-vendors you are authorized to select to perform ChemWhat work.
- Any decision or input to decisions about ChemWhat business must be made to **further ChemWhat interests**, not those of individual employees or other personal interests.
- You must report via the ChemWhat Helpline if ChemWhat employees ask for **personal favors** or **offer special pricing** to an external business partner/contractor in exchange for some personal benefit.



ANTI-BRIBERY EXPECTATIONS

You must not offer, give, seek, or accept bribes. You also must not allow any other party working on behalf of ChemWhat—such as an agent, consultant, or subcontractor—to offer, give, seek, or accept a bribe. A bribe is anything that is given or offered to improperly influence the behavior of someone in business or government. It need not be made in cash. A gift, meal, drink, job offer, travel, or anything of value can also be a bribe—any attempt to “buy” an improper benefit is prohibited, no matter the amount or value of the thing offered.

ChemWhat also prohibits “facilitation” payments. These are small, unofficial payments made to government officials that prompt or expedite routine tasks, such as clearing goods through customs, obtaining a travel visa, or connecting utilities.

The Anti-Bribery Guide further outlines ChemWhat's expectations on anti-bribery and anti-corruption compliance. It is available from this link:



GLOBAL SOCIAL MEDIA POLICY



Many of our employees and partners use social media in their daily work. As we use social media, it's important to understand that the many laws around the world regulating what ChemWhat can say about the Company, our brands and our products apply in social media, just as they do in many other business interactions.

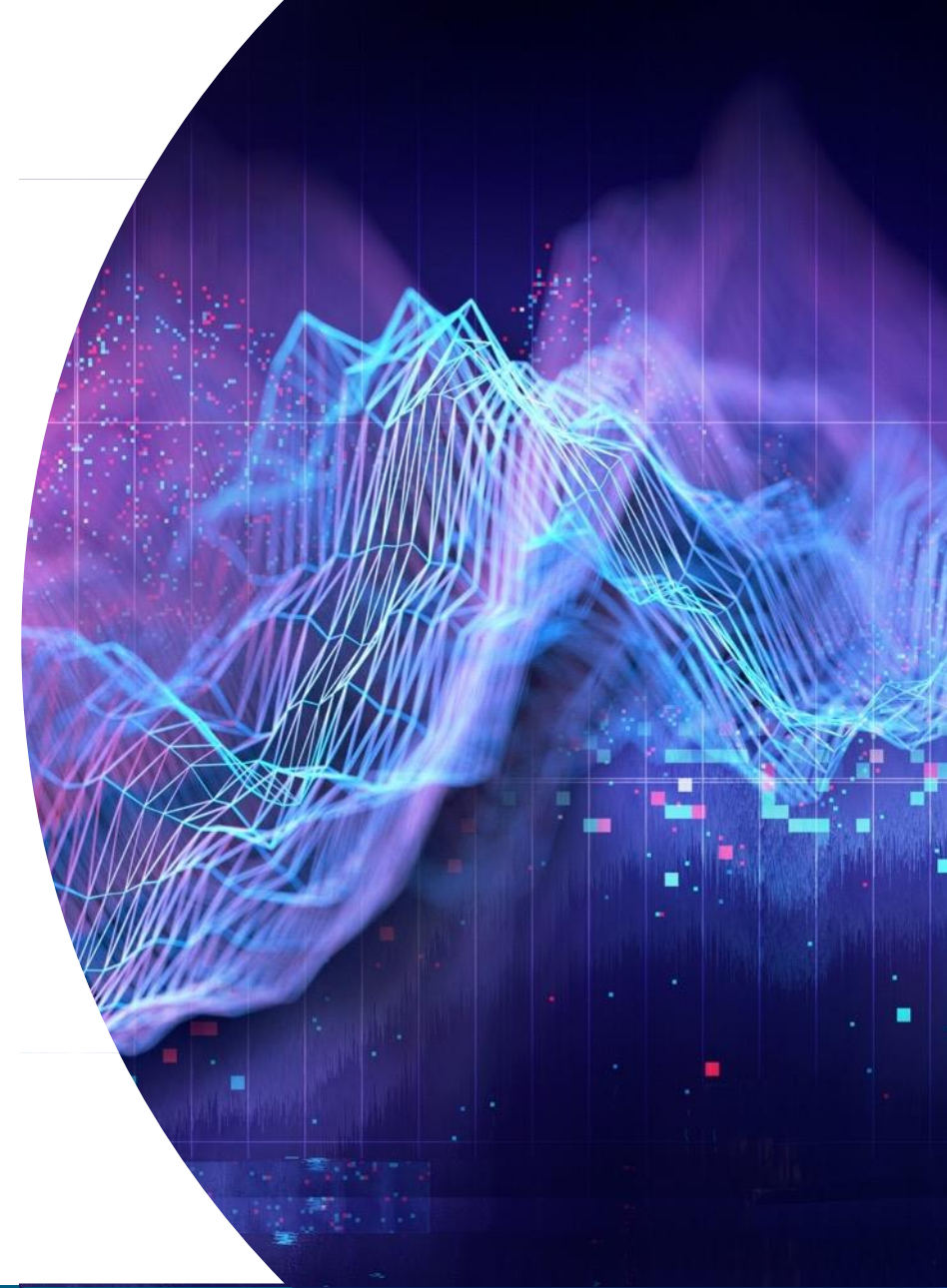
ChemWhat has developed a Global Social Media Policy that describes the principles for its use, as well as standards & procedures for employees and partners when they use it as a key responsibility of their job, for collaborating internally and externally, or in their personal life.

You must take great care not to disclose confidential ChemWhat information over social media—including photographs.

You should also remember to disclose your affiliation with ChemWhat whenever you provide opinions or reviews of ChemWhat or competing products and /or services. These disclosures are equally important for any agency, vendor, partner, or a similar third party who comments on Company or competitive products or business initiatives (i.e., #ad, #paid, #sponsored, #ChemWhatClient). Similarly, if you create a ChemWhat-sponsored Social Media forum (site, mini-site, chat-group, etc.) clearly indicate that ChemWhat is the sponsor.

COMPETITIVE INFORMATION COLLECTION POLICY

- Competitive intelligence is the process of understanding and anticipating the competitive environment in which ChemWhat operates to maximize our competitive advantages, positively influence our decisions and consequently, impact our business results.
- ChemWhat's Competitive Information Collection Policy is organized around Core Principles, such as:
 - We only seek to obtain competitive information in compliance with applicable laws
 - We never misrepresent or mislead anyone about our relationship with ChemWhat
 - We do not make promises in exchange of proprietary information to customers, competitors and other third party
 - We don't use third parties as messengers of information between us and our competitors
- These expectations also apply to external business partners when acting on behalf of ChemWhat.



GIFTS AND BUSINESS ENTERTAINMENT EXPENSES



Exchanging anything of personal value with ChemWhat employees can (or can appear to) improperly influence business decisions, as well as create strain and awkwardness in the business relationship. This is because ChemWhat employees are required to conduct their work solely in the interests of ChemWhat. They are prohibited from personally benefiting in a meaningful way from any external party's dealings with ChemWhat.

For this reason, external parties must not attempt to improperly influence ChemWhat employees using gifts, meals, entertainment, travel, hotel accommodations, or anything else of value.

EXTERNAL BUSINESS PARTNERS THAT MANAGE PERSONAL DATA

PERSONAL DATA

- Personal data, also known as PII (Personally, Identifiable Information) is classified based on the types of data processed (name, consumer email address, etc.) and volumes of personal data processed or handled by the end user. Third Parties collecting or processing PII as part of the activities provided to ChemWhat must be specifically assessed on their Privacy handling capability.
- EBP's Employees (and Subcontractors) must be made aware of the key elements of ChemWhat's Privacy Requirements and understand their personal responsibilities. Staff must be trained in how to implement ChemWhat's Privacy Requirements.
- If applicable ensure Information Security and Privacy compliance is included in the contract.



RETENTION SCHEDULES FOR PERSONAL DATA

These retention schedules apply to ChemWhat United States (US), European Union (EU) and United Kingdom (UK) consumer and employee data, only.

They **do not** apply to ChemWhat consumer and employee data from other countries. The general rule is that any personal data should not be kept for longer than it is needed to provide the service. The periods outline the maximum time personal data should be kept by External business partner in providing the services. If the External business partner can delete the personal data sooner, this should be done. If a Master Services Agreement or Statement of Work provides for a more specific retention period for US, EU or UK personal data for the services you are providing to ChemWhat, that retention period takes precedence over this document.



SUPPLIER CITIZENSHIP

ChemWhat is committed to providing products and services of superior quality and value to the world's consumers, now and for generations to come. Our Citizenship framework is how we are investing in the United Nations Sustainable Development Goals and include focused programs in Diversity & Inclusion, Gender Equality, Sustainability, Community Impact and Ethics & Corporate Responsibility.

ChemWhat cannot deliver those products without collaboration from our supply chain partners and we are making intentional choices to leverage the footprint of our external business partners, buyers, and manufacturing sites to be a Force for Good and a Force for Growth. We believe we can accelerate and amplify our Citizenship results by intentionally enrolling our External Business Partners in this work via two strategy pillars: Supplier Diversity and Responsible Sourcing.



**ETHICS &
CORPORATE
RESPONSIBILITY**



**COMMUNITY
IMPACT**



**DIVERSITY &
INCLUSION**



**GENDER
EQUALITY**



**ENVIRONMENTAL
SUSTAINABILITY**

PUBLICITY GUIDELINES

- ChemWhat generally does not allow External Business Partners to reference publicly their relationship with ChemWhat and our brands due to the confidential nature of our partnerships.
- Examples of this include (but are not limited to): Use of ChemWhat logo, press releases, testimonials or references, ChemWhat speaking requests at External Business Partner or industry events, external award submissions.
- In some cases, it may be beneficial to both ChemWhat and the EBP to do some sort of publicity. In these cases, ChemWhat Purchases should be contacted first, who will assess and then link with Communications, Legal, and other necessary functions to secure an exception to our policy, where appropriate.



OTHER SERVICE-SPECIFIC EXPECTATIONS/GUIDELINES

SAFEGUARDING ASSETS AND INFORMATION • PROTECTING REPUTATION



EBP's Committed to
Securing
ChemWhat Assets
and information

Keeping ChemWhat Information and Assets Secure (Physical & Digital security)

Proper handling of confidential information and ChemWhat assets on site and in-transit to prevent losses.

Records & Information Governance

ChemWhat considers records created or received during the normal course of business a ChemWhat asset.

ChemWhat Technologies and Electronic Communications

You must safeguard ChemWhat's proprietary information and data, as well as the technologies this information is stored on.

Ensuring Product Quality and Safety

Our products and packages are not used for unauthorized purposes.

VARIOUS REQUESTS EXPECTATIONS

All EBPs should reply to ChemWhat various requests such:

Assessments
for Antibribery

Privacy or
Information
Security

Citizenship
Surveys

Sustainable
Sourcing
Audits

QA Audits

Reply timely on all requests.



IN CLOSING



We take compliance very seriously. The intent behind our core expectations / guidelines is to enable compliance at the highest standards for ChemWhat and its partners and to protect and value the information of our customers, consumers, shareholders AND external partners.

If you have any questions about the expectations / guidelines, ask your ChemWhat Purchasing contact for clarifications.

As you manage the policies and controls within your own organization, please take note of our expectations on how to conduct business with or for ChemWhat, including as to allowed sub-vendors handling projects for ChemWhat.

This is not a one-time overview; we expect that you review all the relevant expectations / guidelines with appropriate frequency (i.e. once a year).