

## **Code of Conduct**

Aston Chemicals Limited is committed to responsible and sustainable business practices. We conduct business with respect towards our employees, suppliers, customers, the environment and society, and we expect our suppliers and business partners to do the same. We are committed to compliance with the law, ethical business practices, respect for people and the environment, and serving as a positive influence in our communities and those from which we source.

This document outlines the core principles of how Aston Chemicals Ltd works, and how we expect our suppliers and other business partners to also act:

### **ENGAGE IN LAWFUL AND ETHICAL BUSINESS PRACTICES**

#### **1.1 LEGAL COMPLIANCE**

Aston Chemicals Ltd is committed to conducting its business in accordance with the highest ethical business standards and in compliance with applicable laws and regulations in the countries where we do business. We aim to meet or exceed requirements of applicable environmental, health and safety laws and regulations, and corporate standards.

#### **1.2 PROHIBITION AGAINST BRIBERY AND CORRUPTION**

Aston Chemicals Ltd and our Directors, Managers and employees must adhere to the highest standards of ethical business conduct and must not engage in bribery or corruption in any form, either directly or through third parties.

#### **1.3 IMPROPER GIFTS, HOSPITALITY AND ENTERTAINMENT**

Aston Chemicals Ltd's personnel must not give gifts or entertainment to customers, suppliers or other personnel that create a conflict of interest. Modest gifts and hospitality may be permissible as long as they are not provided as quid pro quo, and are modest in value, infrequent, unsolicited, reasonable and customary in our industry. Cash and cash equivalents such as gift cards are never acceptable. Gifts of tickets for entertainment of any nature require that the donor attend the event with the recipient.

#### **1.4 CONFIDENTIALITY AND PRIVACY**

Aston Chemicals Ltd's personnel must respect and safeguard all confidential information, and only use it for the purpose for which it was provided. Aston Chemicals' employees must promptly inform their line manager if they become aware of any intentional or unintentional improper disclosure or use of confidential information. Aston Chemicals' employees must comply with applicable laws and regulations related to the protection and use of personal information.

#### **1.5 FAIR COMPETITION**

Aston Chemicals Ltd's personnel must conduct their business in a fair and ethical manner and in compliance with all applicable fair competition laws.

### **PROMOTE A RESPECTFUL, FAIR AND DIVERSE WORKPLACE**

#### **2.1 CHILD LABOUR AND YOUNG WORKERS**

Aston Chemicals Ltd will never employ child labour. The term "child" means any person employed under the minimum age for employment in the country. If employing young workers (workers above the minimum age of employment but under the age of 18) Aston Chemicals will comply with all applicable laws and regulations regarding hours, compensation and

will avoid conditions or restrictions that could be harmful to their morals, health, safety and development.

## 2.2 FORCED LABOUR AND HUMAN TRAFFICKING

Aston Chemicals Ltd will not use or benefit from any form of human trafficking, or forced or compulsory labour of any kind, be it prison, bonded, indentured or otherwise. Furthermore, mandatory overtime is not permitted, and workers are allowed to leave their employment after giving the applicable notice. Aston Chemicals will never impose monetary fines, withhold identity papers (such as passports), work permits, remuneration or require recruitment deposits or other constraints as a condition of employment.

## 2.3 HUMANE AND DIGNIFYING TREATMENT

Aston Chemicals Ltd treats all employees with respect and dignity. All personnel must not engage in any kind of physical, verbal, psychological or sexual abuse, harassment or any other forms of intimidation or misconduct. We expect our suppliers to fully meet the requirements of UN Guiding Principles for Business and Human Rights (UNGPs), Universal Declaration on Human Rights, ILO Fundamental (or core) conventions on Labor and The International Bill on Human Rights.

## 2.4 WORKING HOURS

Aston Chemicals Ltd adheres to the legal and contractually agreed-upon limits on hours worked in the countries in which we operate. Employees receive two days off in every seven days, and the legally required daily rest periods.

## 2.5 WAGES, BENEFITS AND TERMS OF EMPLOYMENT

Aston Chemicals Ltd pays employees the legally prescribed, contractually agreed-upon or applicable minimum wage in the countries in which we operate, as well as any legally prescribed benefits. Workers are not subject to financial penalties as a disciplinary measure or for poor performance or to illegal deductions for benefits payments.

## 2.6 EQUALITY, INCLUSION AND DIVERSITY

Aston Chemicals Ltd strives to promote an environment that is free from discrimination and inclusive of all people and their unique abilities, strengths and differences. Aston Chemicals Ltd provides equal opportunities in all aspects of employment and does not subject workers to any illegal discrimination with regard to recruitment, hiring, remuneration, promotion, access to training, professional development, retirement or termination. Any employment decisions are based on workers' ability and not on personal characteristics such as race, colour, religion, gender, age, national origin, citizenship status, sexual orientation, gender identity or expression, marital, partnership or familial status, disability, genetic information, veteran/military status, domestic violence victim status, social background, pregnancy, or any other characteristic protected by law.

## 2.7 FREEDOM OF ASSOCIATION

Aston Chemicals Ltd recognises the right of employees to freely associate and complies with all laws in the countries in which we operate governing the right of employees to select or not to select workplace representatives.

# PROVIDE A SAFE, HEALTHY WORKPLACE AND PROTECT THE ENVIRONMENT AND COMMUNITY

## 3.1 HEALTH AND SAFETY

Aston Chemicals Ltd meets and strives to exceed requirements of applicable health and safety laws and regulations. We maintain a clean, healthy and safe workplace. Work areas are of a standard to prevent accidents, injuries and illnesses and to ensure an adequate level of sanitation. We reduce the potential for injuries and illnesses in the workplace by eliminating or minimising workplace hazards and providing health and safety training to workers.

## 3.2 ENVIRONMENT

Aston Chemicals Ltd meets all requirements of applicable environmental laws and regulations related to our business. We strive to continually improve our environmental footprint by practices such as waste minimisation, reuse and recycling.

We understand that areas of our business which may have an impact on the environment require continuous improvement and monitoring. We aim to conduct our business responsibly, and in a way that reduces the effects of our activities on the environment as far as possible. Aston Chemicals Ltd is therefore committed to the principles below:

- As an absolute minimum, we will comply with all statutory obligations in order to limit the impact of its operations on the environment
- We will regularly review operations in order to make environmental improvements in addition to those required by UK law, where such improvements provide significant benefits at reasonable cost
- We will strive to ensure that our products are handled, stored, shipped and disposed of in a manner which does not present an unacceptable risk to the environment
- We will encourage the full co-operation of all employees in the achievement of good standards of environmental practices

### 3.3 SUSTAINABILITY

Where possible, we will elect to work with raw material suppliers who, amongst other perspectives, take responsibility for their environmental impact. We will also select environmentally responsible transport and warehouse storage partners.

### 3.4 NDPE POLICY

Aston Chemicals Ltd expects all palm oil suppliers, as well as all aspects of their supply chains, to work in full compliance with the laws in the countries in which they operate and to commit to no-deforestation production or sourcing and to no-conversion production or sourcing.

We expect palm oil suppliers to also respect the self-determination and rights of indigenous people and *local communities' right to free, prior, and informed consent (FPIC) prior to any activity that may affect their lands, resources, territories, livelihoods, or food security* according to the UN Declaration on the Rights of Indigenous Peoples (UNDRIP). *Along with a commitment to respect legal and customary land tenure, resource rights of local communities and to respect their workers' rights, with a commitment to support the inclusion of palm oil smallholders and a living income. A commitment to respecting the rights, security and anonymity (when requested) of Human Rights Defenders, whistleblowers and grievance raisers, and a commitment to remediate human rights grievances.*

We also expect palm oil suppliers to conserve and restore High Conservation Value and High Carbon Stocks Areas when expanding palm plantations, and to renounce peat clearance for new plantations and adopt a responsible maintenance system for peat lands in existing plantations. We expect our suppliers to fully meet the obligations of the EUDR, *including to demonstrate that production has not caused deforestation or forest degradation since December 31, 2020*

