

THINKING OF TOMORROW

Omya Group Code of Conduct

2024





Who we are

Letter from the CEO

Our company values of Modesty, Courtesy, Integrity and Perseverance summarize how Omya people behave towards customers, partners and colleagues. These four values are the most visible expression of our company's style and a key aspect of its corporate identity. We are all ambassadors of our company, committed to living these values in our daily work.

Our integrity as individuals is the basis of the integrity of our company. Omya has always been committed to conducting business in a responsible and ethical manner and maintaining a safe, sustainable and productive work environment.

Our Code of Conduct underlines this commitment. It provides general, globally applicable standards of conduct for all individuals who work for or with Omya.

Please read our Code of Conduct thoroughly and carefully. We expect everyone to take personal responsibility to ensure compliance with the rules and to incorporate them into our working lives.

Eric Schachenmann
CEO

Why do we have a Code of Conduct?

To comply with the Code, we must understand and follow the Code, Omya policies and local laws by participating in training, seeking advice and asking questions. Failure to read the Code, participate in training or acknowledge the Code does not relieve us of our obligation to comply with it.

- The Omya Code of Conduct guides our ethical and legal responsibilities to each other, our customers and our business partners.
- The Code helps identify ethical and legal issues that may arise. Importantly, the Code also explains how to address a problem.
- The Code covers many situations, but it cannot cover all the ethical issues we may face. In addition to this Code of Conduct, we must also follow local laws and regulations as well as Omya's other corporate policies and specific internal guidelines.
- If you think there is a conflict between local laws and Omya's Code of Conduct, corporate policies or internal guidelines, please seek guidance from local management or our Legal Department.
- At Omya, anyone who violates our Code, policies, regulations or applicable laws may be subject to disciplinary action.

The local management, the local heads of legal units and the local heads of sites/offices are responsible for supporting their teams and business partners in this endeavor. Each manager is expected to act as an ethical role model for those who report to him.

Who does our Code of Conduct apply to?

Our Code of Conduct applies to:

- All people who work for or with Omya. It is addressed to the company's board members, directors, managers, and employees worldwide.
- Each employee is responsible for reading and understanding our rules, attending all mandatory or appropriate training and ensuring full compliance in their field of work.
- Omya expects its business partners to follow its standards. Business partners must uphold the fundamental principles outlined in the Omya Business Partner Code of Conduct (refer to page 13).



Principles

Our Code of Conduct is not just a set of rules, but a reflection of the principles and values that guide us in our daily actions.

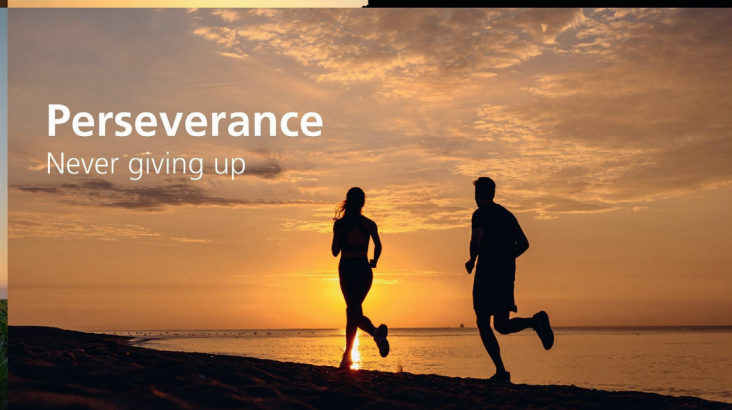
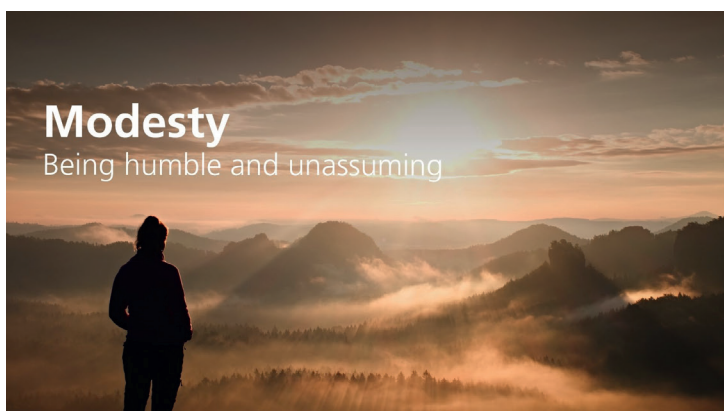
Working in the right way

Our behaviors shape how we work and interact with others, inside and outside of Omya. We hold ourselves and our colleagues to high standards, not just for success and results, but also for the way we achieve them.

We ensure the preservation of our culture, growth of the company, and mitigation of risks by adhering to our Omya values. *Refer to page 19 for more information on making the right decisions.*

Living our Values

- **Modesty** stands for being humble and unassuming. Omya people make their customers and partners feel welcomed by showing interest and listening to them. The opposite of modesty is arrogance.
- **Courtesy** means to be polite and respectful towards other cultures and human individuals, whatever their level or function. Good manners, multicultural education, and adapting to specific people and situations are essential.
- **Integrity** translates into “doing the right thing”. Omya always abides by the law and acts in compliance with its rules and values. Omya people walk the talk, on all levels and in all countries.
- **Perseverance** connotes “never give up”. Omya people always stay focused and committed to realistic goals.





Quality and regulatory compliance

Through robust quality management system, adherence to legal requirements, and a shared commitment to sustainability, Omya strives to be a reliable and responsible partner to its stakeholders.

Omya is committed to serving its customers' and society's requirements over the long-term, continually improving its operations, products and services, managing resources efficiently and conducting business in a sustainable way.

Health and safety first

Nothing is so urgent that we cannot take the time to do it safely and protect our health. At Omya, we believe in following health and safety practices everywhere and every time, to avoid any injury and promote health. We are committed to health and safety.

We expect employees to:

- Comply with all health and safety legal requirements, policies and best practices.
- Participate in health and safety training courses and make an active contribution to maintaining and promoting health and safety.
- Evaluate the hazards of any situation.
- Take care for the health and safety of people around us.
- React and report any unsafe situation.

Our target is zero injury and a healthy life.

Quality management

- Since 1884, Omya stands for quality and customer care. Our commitment to excellence goes beyond compliance, it is a passion for innovation and exceeding customer expectations while ensuring safety for people and the planet. Premium raw materials combined with our expertise have positioned us as a market leader.

Internal policies and legal compliance

- Omya's products are manufactured in accordance with specific internal directives and comply with applicable local laws, specified regulations and rules. Compliance with applicable laws and regulations is mandatory in all business decisions, across all areas of activity, and at every level of managerial responsibility.



Protecting our employees

We are free to speak up

Speaking up when we notice unacceptable behavior is important for our corporate culture and our long-term results. By speaking up, we show our business partners and colleagues that we have the courage to do the right thing and make a difference. By speaking up, we show that wrong behavior is simply not accepted. This contributes to improved working conditions and fair business competition.

Violations of laws and rules by just one employee or contractor can seriously harm our company's reputation and cause significant financial or other damage. At Omya, everyone is encouraged to report any violations of the Code of Conduct. Violations may be reported to your person of trust, or alternatively our web-based Reporting line provides a channel for employees and people outside Omya to report misconduct anonymously.

Non-Retaliation: Omya strictly prohibits retaliation against any person who reports a concern in good faith. If you believe that you or one of your colleagues has faced retaliation for reporting a concern, you must bring this matter to the Legal Department immediately. For further information refer to [Omya | Whistleblowing Directive \(integrityline.io\)](#).



How to report

Option 1: People of trust

- Line Manager
- HR Business Partner
- email: ethics@omya.com

Option 2: Reporting line

Use the Omya Reporting line:



Human rights, diversity and inclusion

One of Omya greatest strengths is the diversity of its workforce, with people of many nationalities and backgrounds working together and sharing common objectives. Omya does not have a 'nationality' to describe its culture but operates in a truly global fashion throughout the world.

At Omya, we recognize the importance of promoting and protecting human rights and ensuring that our workplace is **inclusive, diverse, and free from** any form of **harassment, bullying or discrimination**.

There is no excuse for bullying or harassment. Everybody's dignity and well-being deserve to be respected and protected, regardless of any differences or disagreements.

Our commitment

- We are committed to promoting a culture of diversity, equity and inclusion. We believe that everyone should have equal opportunities, regardless of their race, ethnicity, gender, sexual orientation, age, religion, disability or any other characteristic.
- We are committed to creating a workplace that is free from discrimination, harassment and bias. We do not tolerate any behavior that undermines the dignity and respect of any individual, including but not limited to, derogatory comments, jokes, slurs or physical harassment.
- We are committed to creating an inclusive environment where all employees feel valued, respected and supported. We offer equal opportunities for employment and career development, regardless of any individual's personal characteristics. This includes providing adequate wages, social dialogue and protection.
- We do not tolerate any form of verbal or physical abuse, intimidation or discrimination.
- We do not employ individuals under the legal working age or engage in any form of exploitative or hazardous child labor.
- We respect our employees' lawful freedom of association and recognize their legal rights to organize and collectively negotiate.
- We believe that working hours should be fair, safe and humane, and we comply with all relevant laws and regulations related to working hours.
- We work with our suppliers to ensure that they also adhere to these standards.
- We recognize that upholding these principles is an ongoing process, and we are committed to continuous improvement in our operations. We encourage our employees, suppliers and other stakeholders to report any concerns or violations of this Code of Conduct, and we take appropriate action to address them.

Integrity in work life

We believe in building trust with our business partners by operating with integrity. We comply with all applicable laws wherever we do business.

Conflict of interest

Our commitment to integrity requires each of us to be alert to situations that may create a conflict of interest.

To ensure that Omya's reputation for integrity and professionalism is not compromised, we expect all employees and contractors to disclose potential conflicts of interest promptly and to refrain from engaging in activities that create or appear to create a conflict of interest. We also commit to implementing appropriate procedures to manage conflicts of interest and to making decisions in a fair and impartial manner.

You are required to disclose any potential conflicts of interest immediately to your line manager, HR Business Partner or the Legal Department.

Real-Life Examples

- **Personal Relationships:** Business decisions may become difficult when the person you are dealing with is a friend or family member. If a friend or family member provides services to a company that does business with, wants to do business with, or competes with Omya, a conflict may arise.
- **Outside Employment:** Work outside of Omya may present a potential conflict if it competes with your work for Omya, is in a similar line of business to Omya, or interferes with your ability to fulfill the responsibilities of your job. Before accepting any outside employment, you must obtain written approval from your line manager and your HR Partner. If you participate in community affairs, including political and civic activities, you must represent yourself as an individual citizen. Under no circumstances may you give the impression that you are representing Omya unless you have a specific mandate to do so.
- **Investments:** If you or a person related to you own, either directly or indirectly, a material interest in a company that does business with us, seeks to do business with us, or competes with Omya, it may be a conflict.

Bribery and corruption

We believe that bribery and corruption not only violate legal and ethical standards but also undermine our reputation, trustworthiness and credibility in the marketplace. We are committed to promoting a culture of honesty, transparency and fairness in all our dealings, and we expect all our employees to uphold these commitments.

- We strictly prohibit bribery and corruption in any form and in any situation, whether it involves government officials, business partners or any other individuals.
- We never offer, promise, give or accept bribes, kickbacks or other improper advantages for the purpose of obtaining or retaining business or gaining any other unfair advantage.
- We comply with all applicable laws and regulations regarding bribery and corruption.
- We refuse to do business with any individual or organization that engages in bribery or corruption.
- We ensure that our business partners and suppliers understand and adhere to our directive on bribery and corruption.

Real-Life Examples

- Let's say you work in the procurement department. Your responsibilities include the procurement and purchase of materials, equipment and services. In this scenario, you may be faced with bribery attempts from suppliers. Suppliers may offer kickbacks or bribes to ensure that their products or services are chosen over the competition.
- Let's say you work as a sales representative responsible for attracting new customers and generating revenue. In this scenario, you might face the temptation of a bribe from a potential customer. The customer may offer a bribe, such as cash or expensive gifts, in exchange for preferential treatment, a better price or a contract.



Money laundering

Money laundering is the attempt by individuals or organizations to hide the criminal origin of their money by making it appear to have been earned legitimately. Money laundering is against the law, and at Omya we act responsibly by reducing the risk of being involved, even unknowingly, in the criminal activities of others.

What is considered potentially suspicious?

- Irregularities in the way payments are made, or offers of overpayment.
- Payments in currencies other than those indicated in the corresponding invoices.
- Attempts to make unusually large payments in cash or cash equivalents.
- Payments from someone who is not a party to the contract or payments to/from an account other than the normal Business Relationship Account.

You must report any unusual activity or transaction that may give rise to a concern about money laundering to the Legal Department.

All employees must be alert to unusual transactions and use their good judgment.



Gifts and entertainment

Accepting gifts or entertainment can give the impression of favoritism, interfere with decision-making and ultimately undermine trust between those involved. By refraining from such practices, employees contribute to a work environment based on trust, accountability and ethical behavior.

When conducting business for Omya, we may exchange business gifts and participate in entertainment under certain circumstances, for example to foster good relations between Omya and our customers, vendors or other business partners. However, we must always use good judgment when offering or accepting such courtesies.

If gifts and entertainment are offered frequently or are of significant value, they may be interpreted as influencing decision or creating the appearance of an unauthorized payment (bribe).

- We offer or accept business gifts and entertainment only if intended as simple business courtesies and when doing so does not appear to influence our or our business partner's decisions.
- We offer and accept gifts only if their value does not exceed CHF 50.00. Gifts or entertainment of a value higher than this must be approved by your line manager.
- If somebody offers cash payment, you must politely decline and inform your line manager.
- We only accept business entertainment that is appropriate to the business relationship in question. Unusual expenses, such as the purchase of a contingent of tickets for an event, must be approved in advance by your line manager.

In addition the local policy dealing with gifts and entertainment must be observed.

Fair competition and antitrust law

We comply with all competition laws to protect and promote free and fair competition and to maintain relationships with competitors, customers, suppliers, distributors and other third parties.

Fair competition refers to the practice of conducting business in an open, transparent and honest manner. It means competing based on the merits of our products, services and innovation, rather than engaging in unfair or anti-competitive practices. Antitrust laws, also known as competition laws, are designed to promote competition, protect consumers from deceptive or harmful practices and prevent illegal monopolies.



Violation of competition and antitrust laws is a serious matter that may result in criminal prosecution and grave reputational harm for you and Omya.

As an employee, you play a crucial role in upholding fair competition and compliance with antitrust laws. Here are some key responsibilities:

- **No collusion:** Do not engage in discussions or agreements with competitors to fix prices, divide markets or otherwise limit competition. This includes participating in bidding processes honestly and without engaging in manipulative practices such as bid-rigging.
- **Protecting confidential information:** Safeguard confidential information, both our own and that of third parties entrusted to us, to avoid potential misuse and breaches of trust. Do not share sensitive information with competitors that could harm fair competition.
- **Complying with intellectual property laws:** Respect the intellectual property rights of others and refrain from unauthorized use or appropriation.
- **Taking responsibility:** It is our responsibility to strictly abstain from such prohibited practices and to know and follow our internal guidelines as well as all applicable competition and antitrust laws that apply in our field of work (this applies in particular to all management functions and sales forces). In case of doubt on the compatibility of a planned business transaction with the applicable antitrust and competition laws, it is your duty to consult your line manager and the Legal Department before any commitments are made.



Sanctions and Trade Controls

Omya complies with all applicable sanctions and trade controls. We recognize that these regulations are critical to promoting national security, foreign policy and other public interests. We are committed to conducting our business in a responsible and ethical manner, and to upholding the highest standards of integrity and compliance.

As a global company, it is our responsibility to know and follow all applicable laws and regulations that govern international trade. When we buy, produce, market and ship goods and services or transfer funds and technology, we strictly adhere to import and export control laws and comply with economic sanctions imposed by the United Nations and similar bodies, as well as country specific embargoes. If in doubt, consult the Legal Department.

What we must do:

- Ensure that Omya's products and services comply with relevant trade regulations.
- Follow due diligence before entering relationships with international partners (e.g. suppliers, distributors, customers) to ensure they are not on restricted or blocked party lists.

When involved in export activities, identify products subject to export controls and obtain appropriate approval when required. Omya strictly prohibits any involvement in trade with countries, organizations or persons subject to sanctions or embargoes by the relevant authorities.

Working with Business Partners

Knowing your supply chain can help you make smart decisions, mitigate risk and create value for your business partners.

Omya is committed to conducting business in an ethical, legal and socially responsible manner while aiming for high standards and sustainable practices. We rely on strong business partners who comply with the law and respect the environment and human rights to contribute to our sustainable growth. Our business partners must acknowledge and comply with the Business Partner Code of Conduct.

We expect employees who work with business partners to:

- Read and understand the Business Partner Code of Conduct and contact your line manager if you have any questions.
- Notify your line manager if you suspect that Business Partners are not complying with the relevant requirements.
- Ensure that all procedures, pre-selection or tendering for distributors, suppliers, service provider, agents and other business partners ensure their compliance with the Business Partner Code of Conduct.





Protection of our information and assets

We all have a responsibility to protect Omya's assets.

Protection of property and prohibition of personal use of company assets and employees.

Protecting company property and prohibiting personal use of assets and employees demonstrates individual responsibility and commitment to Omya's success.

Within Omya, we handle the property of our company, our fellow employees and our business partners in a responsible manner and protect it against loss, damage, theft and abuse. This includes funds, facilities, equipment, raw materials, products, documents, software and networks.

We must not:

- Tamper with company property
- Use it for private purposes or personal profit, or remove it from the company's premises without authorization
- Employ or use Omya employees for private purposes, even if the services are privately paid.

Protection of Information and Intellectual Property

By protecting our Intellectual Property, we contribute to the continued success and growth of our company.

Protecting Confidential Information and Intellectual Property is fundamental to fostering a culture of innovation within our company and maintaining the exclusivity of our ideas and inventions. Confidential information includes non-public information and trade secrets, such as customer lists, conditions of sale or purchase offered to certain parties, marketing and strategic plans, and new developments.

To ensure the highest level of confidentiality and safeguarding, we must adhere to the following principles:

- **Confidentiality:** It is of utmost importance that all new developments and sensitive information are treated with strict confidentiality until they are adequately protected by patents or design rights and have had an application filed with the relevant authorities. Should we have access to any confidential information or trade secrets, we must handle such information with the utmost care and use it solely for the intended purpose.
- **Trade Secret Management:** Omya has established a Trade Secret Management system to safeguard the company's most valuable intellectual assets. Employees must follow these strict guidelines:
 - Trade Secrets should only be disclosed internally on a strictly need-to-know basis.
 - Any third party disclosure of our Trade Secret requires a deliberately drafted confidentiality agreement with Trade Secret clauses.
 - For employees who have access to Trade Secrets, the period to maintain confidentiality extends beyond their term of employment.

Please consult Group IP and/or Group Legal for any queries on Trade Secrets and/or if external parties require you to provide our Trade Secrets or to receive their Trade Secrets.

- **Authorized Use:** Information should be accessed, used, and shared solely for legitimate business purposes. **Any disclosure of information to third parties outside Omya requires a prior signed confidentiality agreement.**
- **Secure Handling:** Both physical and digital information must be protected from unauthorized access, damage or loss. Proper measures must be in place to ensure information security, including restricted access to sensitive data. All employees must use strong passwords and diligently safeguard them to prevent unauthorized access to sensitive data and systems.
- **Data Access Rights:** Employees are only permitted to access the information that is necessary for their specific job roles. Seeking or accessing unauthorized data is strictly prohibited.

It is important to recognize that these principles apply not only to our own information but also extend to the information and intellectual property shared with us by our valued business partners.

What is Confidential Information?

Any information not available to the public, and the interest is not to make it available to the public.

Examples:

- Not commercially available products
- New applications of products
- Manufacturing processes
- Price lists
- Distributors', suppliers' or customers' lists
- Projects in development
- Software
- Business plans
- Development or marketing strategies, ideas
- Patents and patent applications may contain confidential information

Data Privacy

Omya applies high standards when processing our employees' personal information and our business partners' data.

All personal data collected and held by Omya is processed fairly, carefully and in compliance with local laws. Access to personnel records is restricted to Omya employees and agents who have appropriate authorization and a business need for that information. All such information is treated with the upmost care and confidentiality to respect each individual's privacy. Sensitive personal data, is treated with special care.

At Omya we:

- Only collect as much personal data as is necessary.
- Ensure that personal data is collected correctly.
- Store personal data securely and restrict access.
- Delete personal data when it is no longer needed.
- Use personal data only for the agreed business purposes.
- Do not disclose personal data to third parties without appropriate security precautions.
- Do not leave personal data unattended or unsecured.

For further Information refer to Omya Data Protection Notice or email dataprotection@omya.com.

It's crucial to use information technology with caution and mindfulness, to protect sensitive data and ensure a secure and productive work environment.

Use of Information Technology

Omya offers its employees a range of technologies and electronic communication tools that enable us to do our jobs. We recognize that our use of IT resources, which include software such as email, messaging services and cloud applications, hardware such as cell phones and laptops, and networks and the Internet, exposes us to potential cyber threats from internal and external sources.

Important to know:

- You are responsible for the secure use, storage and, where appropriate, the safe return of all devices provided to you.
- Email and other forms of electronic and instant communication are business tools.
- Omya reserves the right to review emails and other forms of electronic and instant communication without prior notice to ensure compliance with policy, regulatory and legal requirements.
- Never intentionally browse websites that contain illegal or inappropriate content. Never install illegal, unlicensed or unauthorized software on your PC/ laptop or any other Omya device.
- If you think you may have clicked on a malicious link or shared your password, please change your password and inform the global service desk.

AI Systems:

- Employees are strictly prohibited from using generative AI systems, such as ChatGPT, to process or generate information involving personal data or confidential company information.

For further information, refer to Corporate Policy No 17 Information Security.



Customer and community relations

The success of our company depends to a large degree on the quality of the relationships we develop and maintain with employees, customers, suppliers and the public. Our customers' impression of Omya and their decision to purchase products or services from us are greatly influenced by the people who serve them.

As an ambassador of Omya, we:

- Act with competence and strive for solutions that satisfy our customers.
- Communicate in a polite and respectful manner.
- Follow up on orders and questions promptly, provide business-like replies to inquiries and requests, and perform all duties in a professional manner.
- Take great pride in our work and enjoy doing our very best.

Only authorized people are allowed to talk to the media. Refer to Corporate Policy No 13 for information on specific rules regarding communication with the media.

Sustainability

Thinking of tomorrow and our long-term commitment to benefiting society, the environment, and our customers are at the heart of everything we do. Sustainability at Omya stands for Social, Health and Safety, Environment, Quality, Product Regulatory Affairs, Governance-Systems, and Risk Management. These pillars are the foundation of our identity and are integrated into all our business strategies. The responsibility for achieving our sustainability goals lies with the entire Omya workforce, and we encourage all employees to bring forward their suggestions and ideas.

Environmental responsibility

- We recognize our responsibility to protect the environment and contribute to a sustainable future. We are committed to minimizing our environmental impact and promoting sustainable practices throughout all aspects of our business operations.
- We strive to comply with all applicable environmental laws and regulations, and to go beyond legal requirements, when possible, to implement best practices for environmental protection. We regularly assess our environmental impact and set goals for continuous improvement in areas such as energy efficiency, waste reduction, and resource conservation.
- We prioritize the use of environmentally friendly materials and products in our operations, and work to reduce our reliance on non-renewable resources. We also engage with our suppliers and partners to promote sustainable practices and encourage the adoption of environmentally responsible policies.
- Through these efforts, we aim to minimize our carbon footprint, protect natural resources and ecosystems, and contribute to a sustainable future for all.

Circular Economy

- Omya delivers materials which help our customers to reduce their environmental footprint. Omya minerals can be reused or recycled and they renature as they are compatible with natural ecosystems.
- Omya is committed to circular manufacturing where we re-integrate byproducts into our own production processes and where we use waste streams to produce valuable products.



Useful information

Staying informed is an important task for every employee, enabling us to increase our knowledge and succeed in the professional world.

Making the right decision

If the right decision is not clear or if you see or notice something that raises concern, ask yourself the following questions:

- Is it legal?
- Is it in line with Omya's values?
- Does it feel right?
- Would I feel comfortable explaining my actions to colleagues and my family?
- If you can answer **yes** to all the questions, it's probably okay to do it. If you have any doubts, contact your line manager or the Legal Department.
- If the answer to any of these questions is **no** or **not sure**, then do not do it.

What do I have to consider as a line manager?

All line managers must ensure that their team members receive the guidance, resources and training necessary to understand what is expected of them.

Everyone, regardless of their position or level of authority, is expected to adhere to our Code, policies and standards. However, line managers are also held to a higher standard as role models.

As a line manager you must:

- Live our values and stand up for what is right.
- Know our Code, policies and standards and ensure your team does too.
- Ensure that business objectives are never achieved through improper means.
- Ensure that tools provided (Connect, Concur, etc.) are used and up to date.
- Coach your team on doing the right thing and encourage the right behaviors.
- Encourage employees to share concerns and support those who do.
- Ensure there is no retaliation for reporting concerns.
- Consult with the Legal Department immediately in relation to any possible breaches of compliance with the Code of Conduct.

Training

- As employees, attending compliance training is crucial to our professional development and success. It shows that we take our job responsibilities seriously and that we are committed to upholding the values and principles of Omya.

- By attending compliance training, we become aware of the different topics that are covered in the Code of Conduct, including data protection, anti-bribery and anti-corruption policies, among others. It is important to understand that compliance is everyone's responsibility, and we all have a duty to ensure that we comply with Omya's policies and procedures. Attending compliance training is a way to fulfill this responsibility and ensure that we are aware of our obligations.
- Omya offers a range of online training on different Code of Conduct topics available via Omya Academy. For group training on specific topics contact the Legal Department.

Data protection:

dataprotection@omya.com

Reporting line:



