

Code of Conduct

Atotech's Ethical Commitment

With locations in more than 40 countries in all important industrial regions of the world, Atotech is a market leader worldwide and a truly international company. Our employees come from a wide diversity of backgrounds and work in a broad range of professions. As a result, embracement of the ethical shared values and principles expressed in our Code of Conduct is critical to the success of our company.



Our ethical commitment is based on three core values:

- Respect, the source of sustainable, trust-based operations and relations
- Responsibility, towards others and in our jobs
- Exemplary behavior, which underpins the internal and external credibility of our actions and initiatives.

As a general business principle and expression of these ethical values, Atotech

- Complies with all applicable laws and all regulations and decisions of the United Nations and other international bodies applicable in the countries in which we operate, especially concerning the environment, competition and employment
- Observes the rules of free competition
- Rejects fraud, bribery and corruption in all forms, whether public or private, active or passive.

Atotech respects

- The principles of the Universal Declaration of Human Rights
- The key conventions of the International Labor Organization
- The OECD Guidelines for Multinational Enterprises
- The principles of the United Nations Global Compact.

Atotech has confidence in the loyalty, motivation, competence and sense of responsibility of its employees. We expect them to

- Adhere to the highest standards of integrity (anti-corruption, anti-fraud, anti-trust)
- Avoid any conflict of interest.

Atotech's policy regarding its suppliers, service providers and business partners is to

- Respect each party's interests, with transparent and fairly negotiated contract terms
- Expect them to adhere to principles equivalent to those in our Code of Conduct.

It is through compliance with these fundamental principles that we will be able to protect the quality of our business relationships and to achieve a strong sustainable growth that benefits everyone.

Reinhard Schneider, President of Atotech

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