

Atotech

Code of Conduct

Atotech

Integrity and Corporate Affairs

atotech.com



Introduction

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, compliance with the ethical shared values and principles expressed in our Code of Conduct is critical to the success of our company.

This Code of Conduct is binding for all Atotech staff worldwide. The Code of Conduct defines basic, globally applicable standards of conduct and what is expected from managers and employees. We expect also our suppliers, contractors and business partners to apply equivalent standards.



Geoff Wild
CEO Atotech



Lawful conduct

Atotech complies with all applicable laws and regulations (including any local laws or regulations of countries, states, cities where we operate) and respects decisions of the United Nations. Atotech also acknowledges

- 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



Safety, health, and environment

We create a safe working environment for our employees and customers. Atotech often goes beyond the minimum requirements of health, safety, and environmental laws. We permanently improve our products and processes to prevent health risks and to further minimize their environmental impact – for our employees, our customers, and the society at large.



Free competition

We are committed to the principles of free and fair competition. Atotech requires its employees to strictly apply all applicable antitrust laws. In particular, employees are not permitted to exchange sensitive information with competitors or to enter into collusive agreements.



Anti-corruption

Atotech rejects corruption and the payment of bribes or kickbacks of any kind, whether in dealings with Public Officials or individuals in the private sector. Atotech expects its employees to comply with all applicable anti-corruption laws. This obligation includes the prohibition of unlawful payments or the granting of unlawful benefits to Public Officials, business partners, to their employees, close family members, or other partners and facilitation payments (small cash payments to Public Officials to facilitate administrative acts to which the company or the employee is entitled).



Avoiding conflicts of interest

Personal relationships or interests must not affect Atotech's business activities. Each employee must inform their hierarchy immediately and unasked about any existing or possible conflict of interest and seek a solution together with the management to avoid or mitigate a conflict of interest.



Gifts, hospitality and donations

Giving or receiving gifts, hospitality and donations requires extreme care. Employees must apply the respective Atotech rules which reflect applicable laws or stricter standards. Gifts, hospitality, or donations must never be used to influence business or administrative decisions.



Protection of company assets, anti-fraud

Atotech employees must handle company assets in a responsible manner and protect them against loss, damage, theft, and unauthorized use. Company assets also include intellectual property rights, business know-how or chemical formulas.

We expect our employees to protect our company from any attempts of fraud, whether internally or externally.



Data protection and information security

Atotech collects and processes personal data only for legitimate business reasons in full compliance with the applicable data protection laws. Technical security measures to prevent unauthorized access must comply with state-of-the-art standards.



Speak up

All employees have the right to report violations of the Code of Conduct. Employees reporting such incidents in good faith need not fear any personal or professional disadvantages. Notifications may be made to the local Integrity Officer, the Corporate Integrity Officer, Atotech's Integrity Committee or, anonymously to the law firm Beiten Burkhardt using the following email address:

whistleblowing.atotech@bblaw.com

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