

Supplier Code of Conduct



Human Rights

This Supplier Code of Conduct emphasizes Atotech's expectations of the conduct of suppliers and business partners doing business with Atotech. Suppliers are expected to understand and act in a manner consistent with Atotech's approach to integrity, responsible sourcing, and supply chain management. Atotech requires that its suppliers enforce similar expectations through their own supply chains.

Atotech expects to do business with suppliers that meet our standards and behave in a manner consistent with, and positively reflect, Atotech's values throughout the supply chain. Based on these values, Atotech carefully chooses suppliers that comply with our Code of Conduct and other policies.



Human Rights

At Atotech we are committed to treating our employees with integrity and respect, and we adhere to the following principles:

CHILD LABOR

We comply with applicable laws in each jurisdiction in which we conduct business and, in accordance with International Labor Organization standards, we do not employ anyone under the age of 15.

As such, Atotech requires its suppliers not to employ:

- a) children below 15 years of age (or 14, if allowed by national law in accordance with ILO agreement 138 Article 4+5);
- b) children below the minimum age of employment permitted by the law of the country or the age of the end of compulsory schooling in that country, whichever is higher; or
- c) persons below 18 years of age for work that, by its nature or the circumstances in which it is carried out, is likely to harm the health or safety of such persons;

SLAVE LABOR/HUMAN TRAFFICKING

Atotech does not tolerate forced or slave labor, or any form of human trafficking. Any person employed or engaged by our suppliers must have voluntarily chosen to do so. Any type of slave, forced, bonded or prison labor is prohibited. Employees must also not be in any way restricted in their personal freedom of movement. Exceptions apply only to designated restricted areas (e.g. for safety or confidentiality reasons).

WAGES AND WORKING HOURS

Any person employed or engaged by our suppliers must be given full information on the composition of their remuneration in a clear and understandable manner.

Working time for suppliers' employees shall not exceed the maximum set by the applicable national law and by ILO standards. Compensation shall be paid to employees regularly, in a timely manner and in full according to applicable laws and must comply with applicable national wage laws. Payment must be made in legal tender. Compensation and benefits should aim at providing an adequate standard of living for employees and their families. Unless otherwise provided by local laws, deductions from basic wages as a disciplinary measure shall not be permitted (this does not exclude the entitlement of damages on a contractual or legal basis). Suppliers should inform the workers affected by such deductions at the time of each payment.

Suppliers are expected to provide their employees with fair and competitive compensation and benefits and to support equal pay for work of equal value. It is recommended that suppliers offer their employees ample training and educational opportunities.

DIVERSITY

At Atotech we value a diversity. Next to gender equality, our definition of diversity also includes age, ethnic background, sexual orientation, religion and disability. We are committed to appreciating, doing justice to, and constructively making use, of individual differences among all of our employees.

Health & Safety

The health and safety of our employees is Atotech's highest priority. We believe all occupational injuries and illnesses are preventable. Atotech will never compromise the health or well-being of our employees. We follow all safety laws, regulations and policies at all of our locations. Safety is everyone's responsibility. Atotech's commitment to safety means that each of us needs to be alert to safety risks while we work.

It also means that supervisors have an overriding responsibility to lead by example and support safe work practices. We expect our suppliers to comply with the following topics:

- a) the workplaces, machinery, equipment and processes under their control are safe and without risk to health;
- b) the chemical, physical and biological substances and agents under their control are without risk to health; and
- c) where necessary, adequate protective clothing and protective equipment are provided to prevent, to an extent that is reasonably practicable, risk of accidents or of adverse effects to health;

Occupational health and security practices shall be promoted to avoid accidents and injuries at work, or as a result of using company facilities. These safety

practices and approaches must be communicated to the employees and workers, and workers as well as employees must have sufficient opportunity to be fully trained on how to apply them effectively.

EMERGENCY PREPAREDNESS

Atotech expects its suppliers to assess and identify potential emergency situations and events. The possible impact of such events is to be minimized by implementing emergency plans and response procedures including:

- a) emergency reporting;
- b) employee notification and evacuation procedures;
- c) worker training and drills;
- d) appropriate fire detection and suppression equipment; and
- e) adequate exit facilities.

PREVENTION OF OCCUPATIONAL INJURY AND DISEASES

Atotech expects suppliers to put in place procedures and systems to prevent, manage, track and report occupational injury and diseases. These systems help to encourage workers to report accidents, classify and record injury and disease cases, provide necessary medical treatment and to investigate cases. This information can be utilized to implement corrective actions to eliminate their causes.

PHYSICALLY DEMANDING WORK

Atotech expects suppliers to identify, evaluate and control their workers' exposure to the hazards of physically demanding tasks such as manual material handling, heavy or repetitive lifting, prolonged standing or highly repetitive or forceful assembly tasks.

INDUSTRIAL HYGIENE

Atotech expects suppliers to identify, evaluate and control their workers' exposure to chemical, biological and physical agents. If overexposure can't be controlled by means of engineering or administrative controls, workers are to be protected by appropriate personal protective equipment.

Environment

Suppliers should increase efficiency throughout their companies and take measures to reduce their carbon footprint, energy use, water use, wastes, and other emissions.

Responsible suppliers should look to conserve resources and protect the communities and environment that surround them. Atotech encourages its suppliers to develop and utilize environmentally friendly technologies and to increase the use of renewable energy sources.

Atotech is expecting its suppliers to comply with a variety of environmental aspects including:

a) Hazardous and Chemical Substances

Atotech expects its suppliers to identify and monitor chemical products and other materials posing a hazard to the environment, to ensure their safe handling, movement, storage, recycling or reuse and disposal.

b) Wastewater and Solid Waste

Atotech expects its suppliers to ensure the safe and compliant handling, storage, transportation, disposal, recycling, reuse and management of waste, air emissions and wastewater discharges. Any activity that has the potential to adversely impact human or environmental health shall be appropriately managed, measured and controlled. The release of hazardous substances shall be minimized. Special attention shall be given to active ingredients. Suppliers shall prevent or mitigate accidental spills and fugitive emissions of hazardous materials.

c) Air Emissions

Atotech expects its suppliers to characterize, monitor and control emissions of aerosols, volatile organic chemicals, corrosives, ozone depleting chemicals, combustion by-products and particulates generated from operations, in order to control and treat them as required prior to discharge/disposal.

d) Minimize Waste, Maximize Recycling

Atotech expects its suppliers to reduce or eliminate waste of all types and to reduce the inefficient use of resources, including water and energy, at the source or by practices such as material substitution, conservation, recycling, modifying production, maintenance and facility processes.

Business Integrity

Atotech will not tolerate corruption, bribery, embezzlement or fraud in any form. This includes giving or receiving anything of value, including money, gifts or unlawful incentives to improperly influence negotiations or any other dealings with governments and government officials, customers, or any other third parties.

We have committed to the principles of “We Source Responsibly” and want to partner with suppliers to further develop their sustainability performance in our supply chain. We expect our suppliers to fully comply with applicable laws and to adhere to internationally recognized environmental, social and corporate governance standards. We also expect our suppliers to use their best efforts to implement these standards with their suppliers and subcontractors.

We expect to avoid conflicts of interest and operate honestly and ethically throughout the supply chain and in accordance with applicable law, including those laws pertaining to: anti-competitive business practices, respect for and protection of intellectual property, company and personal data, export controls and economic sanctions.

We choose our business and cooperation partners based on objective and transparent criteria and free from personal interests. We value their integrity and reliability while conducting the legally required checks, such as sanction list screening. We expect our business and cooperation partners to comply with the relevant legal requirements and mandatory regulations.

REPORTING AND NON-RETALIATION

The Atotech Compliance Action Line (CAL) is operated by an independent reporting service and you may contact CAL anytime, via phone or web to raise questions or allegations regarding violations of our Code, our policies, our procedures, or the law.

You may submit a report confidentially and, if you wish, *anonymously*.

REPORT ONLINE:

www.atotech.com/speakup

REPORT BY PHONE:

China 400 120 3148

Germany 0800 182 3246

All other worldwide access numbers can be found [here](#).

BY E-MAIL:

Compliance@atotech.com

ATOTECH POLICIES

This Supplier Code of Conduct draws upon several of Atotech's policies, principles and practices. We encourage individuals to directly access and familiarize themselves with the following Atotech policies which can be found at:

<https://www.atotech.com/responsibility/compliance/>

Atotech's Code of Conduct

Atotech's Conflict Minerals Policy

Atotech's Modern Slavery and Combatting Human Trafficking

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