

SUPPLIER CODE OF CONDUCT



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Innospec believes that honest and transparent business conduct is vital and is committed to ethical business practices and actively enforcing compliance with all applicable laws, regulations and rules.

Innospec's supplier code of conduct (the "Code") applies to all Innospec's suppliers, service providers, and other contractors ("Suppliers"). All Suppliers are responsible for ensuring that their employees involved with Innospec business are familiar, and comply, with the Code. Innospec reserves the right to amend this Code at its sole discretion. The most current version of the Code is available on Innospec's website at www.innospec.com/about-us/corporate-governance/

If any part of this Code is unclear, please ask your Innospec contact for clarification.

Non-compliance with this Code may lead to consequences including termination of the relationship with Innospec.

If at any time a Supplier becomes aware of an actual or potential violation of this Code, or otherwise has any compliance related concern, the matter must be promptly reported to Innospec in accordance with its Reporting Corporate Governance Concerns Policy (Third Party Notice) which is available on Innospec's website at www.innospec.com/about-us/corporate-governance/



Compliance

Suppliers must comply with all applicable laws, regulations and rules in the countries in which the Supplier is located or does business, including relevant international laws and

regulations, such as those related to business integrity, human rights and safety, health and the environment.



Safety, Health & the Environment

Health and Safety

The safety and health of every individual who may be affected by the Supplier's operations, including the Supplier's employees, is paramount. The Supplier must act positively to prevent injury, ill health, damage and loss arising from its operations, and comply with all applicable laws, regulations and rules relating to safety, health and the environment.

Working and Living Conditions

Suppliers must provide workers with ready access to clean toilet facilities, potable water and sanitary food preparation, storage and eating facilities. Where applicable any worker residential facilities provided by the Supplier or a third-party agent must be maintained clean and safe with reasonable living space.

Sustainability & Environment

Suppliers shall ensure that their business operations, including the sourcing, manufacture and distribution of products and the supply of services are conducted with the aim to protect and preserve the environment. Suppliers are expected to strive for continual environmental improvements in their operations including in relation to natural resource consumption, material sourcing, energy and water usage, waste generation and emissions. As a minimum, Suppliers are expected to meet all applicable environmental laws, regulations and rules in the countries in which they operate.

Products & Services

Suppliers shall supply products and services that are of the requisite quality and which meet all applicable safety standards.



Business Integrity

Anti-Bribery & Anti-Corruption

All business must be conducted free from any and all forms of corruption or bribery including facilitation payments (grease payments) and fraud.

All gifts, entertainment and hospitality with Innospec must be reasonable in nature, value and frequency, entirely for business purposes and must not be intended to influence decisions about future business in any way.

Financial Crime

Suppliers must implement sufficiently robust risk management procedures and internal controls to detect, prevent, deter and respond to all forms of financial crime including tax evasion, money laundering, fraud and the financing of terrorism.

Export Controls & Trade Sanctions

Suppliers are required to comply with all applicable trade rules, export controls, restrictions, sanctions and import-export embargos including laws, regulations and rules relating to illegal boycotts.

Competition/Antitrust

Suppliers are to compete fairly and must comply with all applicable competition and anti-trust laws. Suppliers must not engage in agreements and practices that have a restrictive effect on competition such as price fixing, market allocation or abuse of a dominant position.

Data Privacy

Suppliers must comply with all relevant data protection laws, including where applicable the EU General Data Protection Regulation 2016/679 (GDPR), the UK Data Protection Act 2018 and the UK GDPR.

Conflicts of Interest

Suppliers must not engage with Innospec employees in any way that could cause an actual or potential conflict of interest. Suppliers must not seek to take advantage through

manipulation, concealment, abuse of privileged or confidential information, misrepresentation of material facts or any other unfair dealing practice.

Confidentiality

Suppliers must respect and safeguard Innospec's intellectual property including its know-how and confidential information which must not be shared with any third party unless expressly authorised. All information provided by Innospec that is not in the public domain is deemed confidential and is only to be used for its intended purpose.

All confidential information belonging to third parties must be obtained and used legitimately and in compliance with all applicable laws, regulations and contractual obligations.

Insider Trading

Suppliers must not unlawfully use insider information relating to Innospec for material gain or disclose insider information to unauthorised persons. Suppliers must not use confidential information when trading in Innospec shares.

Record Keeping

Suppliers must ensure that all business dealings are transparent and accurately and completely recorded. These records must be retained in accordance with all applicable laws.

Conflict Minerals

Suppliers of materials, products and components are expected to adopt policies and management systems consistent with the Dodd-Frank Wall Street Reform and Consumer Protection Act and the EU Regulation 2017/821 on conflict minerals, to supply materials, products and components that are conflict free and to in turn require their suppliers to adopt similar policies, systems and responsible sourcing practices.

Suppliers are also expected to respond to Innospec's enquiries and provide certification supporting their commitment to being or becoming conflict free, and to verify and document the origin of any conflict minerals that they supply to Innospec.



Human Rights

Innospec respects the human rights of all individuals and expects the same from its Suppliers.

Fair Treatment of Employees

Suppliers must treat their workers fairly and with respect and dignity. No worker is to be subjected to any physical, sexual, psychological or verbal harassment or abuse or other form of intimidation. There must be no illegal discrimination with regard to recruitment or employment practices, or in terms or conditions, including compensation, benefits, advancement, development, discipline, termination or retirement, based on: race, age, role, gender, gender identity, colour, ethnicity, country of origin, social class, religion, sexual orientation, marital status, pregnancy, dependents, disability, union membership, political views or any other reason.

Modern Slavery

Suppliers must not permit any form of forced, bonded or child labour or human trafficking as defined by the International Labour Organization (ILO) and must not permit any form of unacceptable treatment of workers including exploitation of children or involuntary servitude. Suppliers shall conduct appropriate due diligence and effective supply chain tracing and supply chain management measures to ensure that they do not supply goods which in

whole or in part have been mined, produced or manufactured using forced labour or which, upon entry to the US, would be presumed to have been mined, produced or manufactured using forced labour.

Terms of Employment

Suppliers shall commit to implementing a fair policy of employment and remuneration in compliance with applicable laws, regulations and rules. Suppliers must comply with all applicable laws and regulations relating to minimum wage and working hours.

Trade Unions and Collective Bargaining

Suppliers must respect and recognise all applicable legal rights of workers to freedom of association and collective bargaining. Workers are not to be intimidated or harassed in the exercise of this legal right.

Grievances

Suppliers are to provide a mechanism for individuals to raise concerns about actual or potential violations of law or the principles provided in this Code. If raised, such concerns must be addressed in a fair and transparent way. Suppliers are expected to protect confidentiality and prohibit retaliation against those who raise any concerns.

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