



# KRONOS™

## Supplier Code of Conduct

### Together, we are building a bright future

At KRONOS we have a relentless drive to improve - our processes, our products, our service to our customers. We are investing in new technologies, in our culture, and in ways of working smarter. We believe we can make the future brighter by being a more sustainable business in every sense: for the environment as well as for our customers, our people, and our communities.

We choose to align our business with sound environmental, social, and governance (ESG) principles as outlined below, and we expect our business partners (suppliers, subcontractors, and service providers) to work together with us and do the same. To maintain a business relationship with KRONOS, our partners must commit to practice the values defined in this Supplier Code of Conduct (Code) or adhere to equivalent values as defined in their own code.





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## KRONOS and Business Partner Commitments

Customer, investor, and stakeholder expectations and regulatory requirements in the areas of ESG are increasing rapidly, as is the need to partner within the supply chain to address these expectations and ensure compliance with new requirements. Specifically in the area of supply chain, the German Act on Corporate Due Diligence Obligations for the Prevention of Human Rights Violations in the Supply Chains (Lieferkettensorgfaltspflichtengesetz—LkSG) was issued on July 16, 2021. On February 23, 2022, the European Commission issued a Proposed Directive on corporate sustainability due diligence applicable to companies doing business in the EU supply chain. Both laws require certain enterprises to comply with a broad set of supply chain due diligence requirements related to human rights and environmental matters. These laws together with other applicable enacted laws and legal requirements imposing ESG obligations impacting the supply chain are referred to as (“Supply Chain Regulations”).

To ensure mutual success in achieving compliance with these and other ESG laws that may emerge, KRONOS and its business partners agree to the following:

### Compliance with Laws and this Code

**Compliance.** Comply with laws applicable to business operations, including Supply Chain Regulations. Implement systems, processes, and controls to ensure compliance with applicable laws and the principles set forth in this Code, including policies, training, monitoring, auditing, and corrective action mechanisms. Business partners will implement these standards with their own suppliers, subcontractors, and service providers.

**Data.** Agree to provide information and data necessary for business partners in the supply chain to achieve compliance with Supply Chain Regulations, in particular those requiring ESG or supply chain due diligence or disclosure.

### Ethics

**Corruption.** Implement a zero-tolerance policy toward bribery and corruption. Abide by anti-bribery and anti-corruption laws (including the Foreign Corrupt Practices Act, and any other applicable local laws dealing with the bribery of government officials). Offering or accepting kickbacks, bribes, and/or other illegal payments will not be condoned or tolerated.

**Competition.** Compete fairly and strictly adhere to competition and anti-trust laws with zero tolerance for price-fixing, market allocation, or abuse of dominant position. Products or services will not be offered in a misleading way.

**Confidentiality and Data Protection.** Protect confidential information shared among business partners and act to prevent its misuse, theft, fraud, or improper disclosure, and comply with applicable privacy laws for personal data of employees, which is to be used for legitimate and authorized business purposes only.

**Trade.** Comply with trade and import/export laws and regulations and provide accurate and truthful information to customs officials, as required.

### Safety & Environment

**Workers.** Comply with applicable workplace health and safety laws. Provide a safe, healthy, and hygienic work environment for workers, and implement necessary measures to prevent accidents, exposures, and health impacts, including appropriate controls, training, work procedures, and provision of personal protective equipment. Track safety performance and continuously strive for improvement.

**Operations.** Reduce the impact of operations on the environment and the public by responsibly managing manufacturing and production processes, equipment, and



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materials used in the processes in compliance with applicable laws and permits/authorizations. Recover/reuse/repurpose production residues to the extent reasonable and reduce and effectively use energy and other natural resources.

**Planet.** Protect the environment by complying with applicable international, national, and local laws and treaties, including the import or export of hazardous wastes. Maintain procedures and systems to ensure safe and secure handling, transport, storage, recycle, reuse, and management of raw materials, products, water and waste.

### Products

**Product Safety and Responsibility.** Adhere to laws on hazard identification, risk assessment, labeling, packaging, and safe use of products. Upon request, timely provide information on product content, product characteristics, safe use/safety, environmental impacts, and regulatory authorizations necessary for users of the product to determine their own compliance with applicable laws.

**Scientific Studies and Protection of Animals.** Ensure scientific studies are carried out in accordance with applicable laws and internationally accepted standards governing animal testing. Apply the 3R principle (replace/ reduce/refine) as a general rule and when possible, substitute testing on animals with scientifically validated, governmentally approved, in-vitro test methods.

**Conflict Minerals.** Comply with applicable laws banning the use in manufacturing processes or products of conflict minerals from identified conflict locations.

### People

**Human rights.** Respect the rights and dignity of all persons, aligning operations and strategies with the universally accepted principles followed by the UN Global Compact, the provisions of the UN Universal Declaration of Human Rights, and the Conventions of the International Labor Organization (ILO).

**Worktime.** Ensure worktimes comply with applicable national laws, industrial sector standards, and local labor agreements or relevant ILO conventions, whichever are stricter in their protection of employees' time off work.

**Wages and Social Benefits.** Comply with applicable laws on wages, benefits, and overtime. Ensure wages paid to employees are not unlawfully withheld. Ensure wages paid to employees meet or exceed the applicable national legal minimum wage, or the minimum wage established for the industrial sector, and provide employees their corresponding employment entitlements. Ensure overtime hours are paid at the legally mandated premium.

**Training and Qualification.** Actively promote and develop employees' professional skills on all levels by means of suitable training and further education measures.

**Child Labor.** Uphold zero tolerance of child labor and exploitation of children or adolescents in any form.

**Forced Labor.** Ban all forms of human trafficking, slavery, forced, and/or compulsory labor.

**Unlawful Eviction.** Ensure that operations do not result in unlawful eviction from or taking of land, forest, or waters.

**Use of Security Forces.** If security personnel are used, assure such security is provided in an effective, lawful, and responsible manner.

**Freedom of Association and Collective Bargaining.** Uphold and protect the rights of employees to freedom of association and collective bargaining.

**Discipline.** Treat all employees with dignity and respect. Disciplinary measures are imposed in observation of applicable national and international laws and norms, as well as internationally recognized human rights.



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**Discrimination.** Comply with applicable employment discrimination laws and make equal opportunities and equal treatment integral elements of formal company policy.

**Harassment and Abuse of Labor.** Comply with applicable laws on harassment and abuse of employees. Ensure that employees are not subjected to psychological, verbal, sexual or physical harassment, or other unlawful form of abuse in the workplace.

**Complaints mechanism.** Implement and maintain whistleblowing and human rights/ environmental related complaints mechanisms for employees and employees in the supply chain in compliance with applicable laws, including applicable Supply Chain Regulations.

### Implementation

**Rated by Third Party ESG Rating Service.** We believe it is essential for KRONOS and our suppliers to seek ways to centralize ESG information throughout the supply chain to meet regulatory obligations and for consistency. Therefore, we require our suppliers to have an assessment performed by a certified third party ESG rating service that uses internationally accepted principles for sustainability reporting and maintain over time at least an average rating. Ratings shall be provided to KRONOS upon reasonable request. KRONOS maintains a rating with EcoVadis, who is our preferred supplier because this service is used extensively by our customers and many of our suppliers.

**Reporting.** Business partners must:

- (1) notify KRONOS of unethical or illegal conduct impacting or involving KRONOS, and
- (2) report to KRONOS any potential violation of this Code by them or suppliers in their supply chains.

**Audits.** KRONOS reserves the right to audit, assess and monitor its business partners' compliance with this Supplier Code of Conduct, and expects its business partners to use their best efforts to implement auditing mechanisms with their suppliers, subcontractors, and service providers.

**Compliance with Supplier Code of Conduct.** Suppliers who are not in compliance with this Code may be terminated and precluded from consideration of future business. Failure to observe this Code will be reported to the business partner's management for their attention and, if necessary, for reasonable corrective action. Any corrective action must be promptly implemented by business partners.

### Confirmation

Mutual Commitments

Acknowledged and Agreed\*:

KRONOS Worldwide, Inc.

\_\_\_\_\_  
Business Partner Company Name

\_\_\_\_\_  
Signature

Jim M. Buch  
President and Chief Executive Officer  
June 2022

\_\_\_\_\_  
Date

\_\_\_\_\_  
Printed Name and Title

*\*This Code contains general requirements applicable to all business partners of KRONOS and its affiliates. Specific contractual provisions with a higher standard supersede these general requirements. If there is a conflict between an applicable law and this Code, the applicable law prevails.*