



VIBRANTZ
TECHNOLOGIES™

CODE OF ETHICS

MESSAGE FROM THE PRESIDENT AND CEO

Dear Colleagues,

Coming together as Vibrantz Technologies has presented us with the unique benefit of the strong histories, reputations and cultures of our three legacy companies. Looking ahead, focusing on and enriching our shared values of ethics, integrity and trust are imperative as we collaborate with our new colleagues across the world, serve our over 11,000 customers, strive for top-tier financial performance, and work to create a long-term future for Vibrantz Technologies.

The guiding principles governing our behavior and how we do business are part of our every day as colleagues, employees, managers, mentors and leaders. And as an enterprise of larger scale poised for even greater growth and success, we have the opportunity to recommit to respectful, open and transparent communication with each other and our customers, continue to do the right thing, and foster an environment where everyone feels comfortable raising concerns.

You will find the Vibrantz Code of Ethics on the pages that follow. It is the expectation that you read and apply the standards and situations in this document with your colleagues, customers, vendors, suppliers and supervisors. Most importantly, I ask that when you see something questionable or concerning, you say something. Your manager, a member of the human resources team or Mark Whitney, our General Counsel can answer any questions and we ask that you report improper or unethical behavior to the Vibrantz Ethics Hotline as noted in the Code of Ethics.

Your ongoing commitment to operating ethically day in and day out is an important step in our journey to becoming an enduring and sustainable world-class specialty chemicals and materials company.

Thank you for all that you do for Vibrantz and please continue to work safely,



Michael Wilson
President and Chief Executive Officer

MESSAGE FROM THE GENERAL COUNSEL

Dear Colleagues,

Our Code of Ethics has been adopted by the Board of Directors of Vibrantz Technologies Inc. and its subsidiaries and affiliates (collectively, “Vibrantz” or the “Company”), and is the primary guide for ethical behavior for all Vibrantz employees throughout the world.

Ethical behavior is not always easy to define. However, fairness, honesty, respect and trust are the principal characteristics of ethical behavior. Employees must always act in good faith, responsibly, with due care, competence and diligence, without misrepresenting facts or allowing independent judgment to be subordinated. Employees of the Company must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentations of material facts, or any other unfair-dealing practice.

Every Vibrantz director, officer and employee has the responsibility to obey the law and act ethically. This Code of Ethics provides an outline of those general legal and ethical requirements. It is not intended to make you an expert in such areas. Instead, it is designed to alert you to problems you may face and enable you to know when you should obtain guidance from legal counsel before taking action that may have a legal impact upon the Company and upon you.

If you believe that you have observed something improper or unethical, you have an obligation to take action and to alert the Company. If you have any questions or concerns, or want to report a possible violation, you should speak with your Human Resources Representative, or use or call the Vibrantz Ethics Hotline.

On an annual basis, some of you may be required to sign a statement acknowledging that you have read and understand the Vibrantz Code of Ethics. This acknowledgment also requires you to confirm that you will comply with this Code of Ethics in all of your business activities at Vibrantz.

If you have any questions or comments about this Code of Ethics or what your responsibilities are, please feel free to contact me.



Mark Whitney
Senior Vice President, General Counsel

AN IMPORTANT INTRODUCTION

Vibrantz Technologies is committed to acting to the highest ethical and legal standards.

All Vibrantz personnel are responsible for being familiar with and following this Code of Ethics and, more broadly, for conducting themselves in an ethical and lawful manner. Conduct in violation of the law or this Code of Ethics is not excused because you perceive such conduct to benefit the Company.

WHO MUST FOLLOW THE CODE OF ETHICS

Vibrantz's Code of Ethics applies to everyone (directors, officers and employees) in our organization everywhere in the world. Each of us is accountable for ensuring that our conduct aligns with the standards set forth in the Code of Ethics. Violators of the Code may be subject to disciplinary action (including termination of employment), legal proceedings, and, in some circumstances, criminal prosecution.

It is important that we take our responsibilities under this Code seriously. If you have questions, please consult with your supervisor, Human Resources Representative, or the Legal Department.

In rare circumstances, exceptions to or waivers of the Code may be appropriate. Exceptions or waivers requested for Vibrantz executive officers or directors will be considered by the Company's Board of Managers. Exceptions and waivers requested for all other Vibrantz personnel will be considered by the Company's General Counsel.

YOUR RESPONSIBILITY

As a Vibrantz employee, officer or director, you are expected to:

- Read, know and comply with the Code of Ethics;
- Ask for help when you aren't sure if a decision or action you are considering is ethical or lawful;
- Participate in ethics and compliance education and training;
- Understand that you may have an obligation to promptly report any activity that in your judgment would violate the Code of Ethics;
- Cooperate with Vibrantz representatives conducting internal investigations; and
- Affirm your responsibility to comply with the Code of Ethics when asked to do so.

SEEKING ADVICE OR REPORTING CONCERNS OR VIOLATIONS

When faced with concerns about unethical business conduct, seek the advice and guidance necessary to resolve the matter. Do not hesitate to ask for help if you are in a situation and do not know what to do.

Many issues can be addressed through your supervisor. You should first consider raising the issue with him or her. If you feel that your supervisor is not adequately addressing your concern, or if it would be inappropriate or you are uncomfortable raising the issue with your supervisor, you are encouraged to contact your local Human Resources Representative or the Legal Department. Alternatively, you can make a report through our confidential Ethics Hotline service.

NO RETALIATION

It is against Company policy to retaliate against or intimidate anyone for providing information in good faith about an ethical or legal concern, or for cooperating in an internal investigation.

POLICIES, PROCEDURES, AND GUIDELINES

The Code of Ethics does not address all workplace conduct. The Company maintains additional policies, procedures and guidelines that may provide further guidance on matters in the Code or address conduct not covered by the Code. In addition, there may be ethical and legal considerations not included in the Code of Ethics applicable to your responsibilities with Vibrantz, which you should be familiar with and follow.

OUR WORKPLACE**HUMAN RIGHTS**

As a citizen of the world and a responsible member of society, Vibrantz respects the dignity of individuals, the needs of our communities and the vulnerability of the environment. Corporate social responsibility is a belief at Vibrantz and a value integral to the way we conduct business. Vibrantz is committed to respecting the human rights of others. We will not use slave labor, child labor, human trafficking, physical punishment, or forced or compulsory labor. The Company will not knowingly do business with any individual or company that engages in such conduct.

INCLUSION

Vibrantz is committed to practices that result in the inclusion of all employees and that advance equal employment for qualified individuals. We strive to maintain an environment where each of us,

regardless of cultural background, gender, race, color, religion, ethnicity, age, national origin, sexual orientation, gender identity, disability, level or position, can reach our full potential and make a difference every day.

HARASSMENT, DISCRIMINATION AND WORKPLACE VIOLENCE

Vibrantz is committed to maintaining a culture of respect within our organization. We expect each individual to be treated with fairness and respect. Harassment or discrimination in violation of applicable laws is prohibited, including harassment or discrimination targeted at an individual because of his or her race, color, religion, gender, sexual orientation, age, disability, national origin, veteran status, marital status, or any other characteristic not related to job performance. The use or circulation of offensive materials or “humor” at another’s expense undermines respect and is not appropriate in Vibrantz’s culture.

Examples of harassment include:

- Threats, offensive sexual remarks or innuendoes, derogatory remarks, or jokes based on an individual’s sex, race, religion, national origin, disability, age or other protected status;
- Offensive physical conduct, such as assault, unwanted touching, or blocking an employee’s freedom of movement;
- Written or verbal communications containing statements or materials that may be offensive to individuals in a particular protected group, such as racial or ethnic caricatures;
- Unwanted sexual advances, propositions, or demands for sexual favors; and
- Use of computers and other electronic devices, including the Internet and email system, to transmit, communicate or receive sexually suggestive, pornographic or sexually explicit pictures, jokes or messages or other offensive or derogatory materials.

Vibrantz also will not tolerate violence in the workplace in any form. Inappropriate conduct includes physical assault, threat of physical harm, stalking, intimidation, and theft or vandalism of property.

If you observe or experience behavior at work that you feel constitutes harassment or workplace violence, you are encouraged to report it immediately to your supervisor or local Human Resources Representative, or through the Ethics Hotline.

SUBSTANCE ABUSE

Vibrantz personnel should be free of impairment due to alcohol or drugs during work time. All personnel are prohibited from possessing or using illegal drugs on Company property or while on Company business. In addition, the unauthorized possession or use of alcohol on Company property is prohibited. The use of alcohol off premises while on Company business is prohibited if its use results in either impairment of the person’s business judgment or job performance, or places at risk the safety of the person or others.

EMPLOYEE PERSONAL RELATIONSHIPS

Personal relationships between employees on their personal time and off Company property fall outside Vibrantz's policy. However, it is Vibrantz policy that under most circumstances relatives of employees will not be hired, or continue to work in the same department, division, or facility as the employee if their duties and responsibilities would:

- Create a supervisor-subordinate relationship between the employee and relative;
- Have potential for adversely affecting safety, security, or morale;
- Involve actual or perceived conflicts of interest, including situations where the employee would be in a position to affect the compensation, advancement, or other terms or conditions of employment of a relative; or
- Place the employee and relative in the same department.

An employee who marries or establishes a significant relationship with another employee generally may continue in his or her current position unless it causes one of the circumstances noted above. In such circumstances, Vibrantz will attempt to find another position within the Company for one of the employees to eliminate the circumstances.

FRAUD

Vibrantz is committed to preventing fraud and dealing fairly with our employees, customers, suppliers and other third parties. Fraud generally involves taking something to which you are not entitled or lying to gain a benefit for yourself or another person. Such conduct is unacceptable. We are all to conduct business with integrity and we should not lie, cheat, steal, or deceive.

Examples that would be considered fraud include:

- Purposely submitting false or inaccurate travel and expense reports for reimbursement;
- Using or taking Company funds for private use;
- Intentionally recording a false or misleading transaction or accounting entry;
- Misrepresenting personal information to Vibrantz Human Resources or benefit program administrators;
- Forging or altering a Company check;
- Engaging in bribery or embezzlement; and
- Stealing Vibrantz property.

The Company depends on you to prevent fraud. If you have reason to believe that any type of fraud has or will occur, you are encouraged to report the situation immediately to your supervisor or local Human Resources Representative, or through the Ethics Hotline.

BRIBERY AND CORRUPTION

Directors, officers and employees must comply with the Company's Worldwide Anti-Corruption Policy which requires compliance by all worldwide employees, agents, officers and directors of the Company with the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act and similar anti-corruption laws of other countries in which the Company does or intends to do business.

SOCIAL MEDIA

Social media outlets are a popular form of communication. You must use care and consideration in postings or communications related to Vibrantz. Specifically, you should:

- Obtain the Company's specific authorization before using social media (e.g., Facebook, Twitter, YouTube, and LinkedIn) on behalf of Vibrantz;
- Not disclose confidential or proprietary Vibrantz information, including trade secrets, intellectual property, and copyrighted or trademarked information; and
- Not post anything online that is defamatory or harassing.

You are not permitted to speak as a representative of Vibrantz without specific authorization. Accordingly, to the extent that you reference the Company in social media communications, always make clear that you do not speak for the Company and that the thoughts and opinions are your own and not the Company's.

OUR CUSTOMERS, SUPPLIERS AND COMPETITORS**CONFLICTS OF INTEREST****PERSONAL INTERESTS WHEN DEALING WITH CUSTOMERS AND SUPPLIERS**

You should not seek personal benefit from the relationships you have with our customers and suppliers. You must be free from the influences of personal considerations when representing Vibrantz in transactions with outside parties, when making recommendations related to such transactions, or when making decisions about such transactions.

Vibrantz personnel are not permitted to engage in outside or other business interests that could:

- Adversely affect Vibrantz's relationship with its customers, vendors or contractors;
- Violate any provision of their employment agreements; or
- Require the other business activity to be performed on Vibrantz work time.

FINANCIAL INTERESTS IN OTHER ORGANIZATIONS

You and your close relatives should not have significant investments or other financial interests in the business of a customer, competitor or supplier. This may create a conflict of interest. Relatively small investments in the securities of publicly owned corporations would not normally be considered to create a conflict of interest.

Vibrantz personnel are not authorized to execute or approve any transaction in which the individual has a direct or indirect financial conflict of interest. Any conflict of interest of this type should be promptly reported to a Human Resources Representative or the Legal Department.

Vibrantz personnel must disclose to the Company any conflicts of interest or potential conflicts of interest, including any material transaction or relationship involving a potential conflict of interest, in accordance with any procedures adopted by the Company. In the absence of any formal procedures, a director, officer, or employee should communicate directly to the Company's General Counsel if he or she becomes aware of a conflict of interest or a potential conflict.

GIVING OR RECEIVING CASH, GIFTS, SERVICES, FAVORS, OTHER BENEFITS OR BUSINESS COURTESIES

Vibrantz sells and purchases products and services on the basis of price.

You and your close relatives must not offer, solicit or accept any items of value to/from any person or organization that does or seeks to do business with, or is a competitor of, the Company if such circumstances may be construed as an attempt to influence business decisions. Such practices are not only against Company policy, but may be in violation of the U.S. or other anticorruption laws. You should be careful to avoid any potential misunderstanding or adverse effect on the reputation of Vibrantz.

It is prohibited to ask any of Vibrantz's customers or suppliers to provide any type of gift or gratuities. If a gift or gratuity is offered to you that is outside customary business practices, your supervisor or the Legal Department must approve it prior to its acceptance.

If the purpose is to facilitate legitimate business discussions or to foster better general business relations, the giving or receiving of modest meals, refreshments, entertainment, small gifts or other incidentals generally is allowed under the following guidelines.

- It is consistent with accepted business customs and practices;
- It is for a Company business purpose, or is given in connection with a recognized gift-giving occasion or cultural event where gifts are appropriate;
- It is not illegal or in violation of the ethical guidelines
- It is of reasonable value and would be paid by normal Company expense account procedures;
- It cannot be construed as a bribe, payoff or kickback;
- It is not given or received on a frequent basis;
- It will not cause, or be perceived to cause, the recipient to alter normal business judgment concerning any transaction with Vibrantz; and

- It will not be an embarrassment to Vibrantz or the employee if publicly disclosed.

The offer or acceptance of cash, cash equivalents, or securities is not appropriate under any circumstances.

Please note that special restrictions apply when dealing with governments and “government officials.” “Government officials” may be very broadly defined and include employees of businesses owned or controlled by the government. It is Vibrantz’s policy to comply with all applicable laws and regulations regarding payments to, or providing things of value to, government officials and government employees. You should not offer, authorize, or make any illegal payments, directly or indirectly, to a government official, political party, or candidate for political office with the objective of having that person use his/her influence to obtain or retain business for Vibrantz. It is against Vibrantz policy for any Vibrantz personnel to provide any gifts, entertainment, meals, transportation, lodging, or other things of value to any person working for a government or government owned or controlled entity without prior, specific approval of the Legal Department. Using a third party to engage in such conduct also is prohibited.

COMPETITION

CONTACTS WITH COMPETITORS

In all discussions or other dealings with competitors, avoid any communications that could be interpreted as an expressed or implied agreement that could be construed as restricting competition. Such agreements or understandings may expose you to criminal prosecution and imprisonment and the Company to monetary penalties or significant damage claims.

You should avoid any discussion or other communications with competitors concerning the following:

- Prices;
- Pricing policies;
- Bids;
- Discounts, royalties or promotions;
- Credit or shipping terms or other conditions of sale;
- Choice of customers or allocating customers between competitors;
- Products to be manufactured and/or sold; and
- Employee compensation practices.

DEALING WITH CUSTOMERS

It is vital that we continue to cultivate the trust of our customers. Care must be exercised to avoid violating the law by, for example:

- Imposing territorial, customer, or end-use restrictions on the customer’s ability to resell our products;

- Attempting to obtain a customer’s agreement that they will buy all of their requirements for a particular product solely from Vibrantz or will not purchase competitive products;
- Requiring a customer to buy one product as a condition of selling that customer another product; and
- Offering competing customers different prices, discounts, rebates or other terms of sale for the same or similar products without a valid business reason.

When in doubt, consult with the Legal Department.

GOVERNMENT CONTRACTING

There are complex regulations governing persons and entities that contract with the government. Such contracts can be significantly different from those encountered in contracts with non-governmental entities.

You should consult with an expert in government contracting when dealing with transactions involving government contracts. If in need of guidance, contact the Legal Department.

INFORMATION ABOUT OTHER COMPANIES

You should not engage in illegal or improper acts to obtain another company’s trade secrets or other confidential business, financial, scientific, or technical information. The use of industrial espionage, trespassing, burglary, wiretapping, or theft to obtain such information is prohibited. You should not hire a competitor’s employee in order to obtain confidential information or improperly solicit confidential information from employees of any party.

You should not disclose or discuss confidential information from a previous employer.

GLOBAL BUSINESS ACTIVITIES

FACILITATING OR EXPEDITING PAYMENTS

Facilitating or expediting payments to secure timely performance of “routine governmental actions” to which the Company is entitled under local law is prohibited, unless pre-approved by the Legal Department. Such actions include obtaining permits and licenses, processing visa and work permits, mail pickup and delivery, and providing telephone and water services.

Pre-approved facilitating and expediting payments are required to be recorded as a business expense in the Company’s books and records.

EXPORT CONTROL – PRODUCTS AND TECHNOLOGY

U.S. and international trade laws and regulations govern the export of products and technical data from one country to another. Vibrantz’s policy is to comply with all applicable export regulations worldwide.

A customer order or the internal or external transfer of technology may require special approvals, licenses or permits. Whether a particular transaction requires prior approval will depend on the product’s specifications, country of origin and destination, intended end-use, identity of the consignee, and identity of the ultimate end-user.

Please be aware that “exportation” of technical data can occur by mail, physically carrying the information, or by transmission of information via fax, email, or phone, even if only to a Vibrantz facility in another country. Disclosing technical information to a non-U.S. citizen and providing information to non-U.S. companies or other non-U.S. individuals also may be deemed an “export” even if those individuals or companies are in the U.S. Consequently, any disclosure to a non-U.S. person or entity must be reviewed for export control compliance.

Export laws and regulations are constantly changing. For questions regarding the proposed export of product or technical data, you should review the matter with the Legal Department.

SANCTIONS, EMBARGOES, AND ANTI-TERRORISM

Vibrantz and its foreign subsidiaries are subject to U.S. laws relating to sanctions and embargoes. These laws prohibit transactions with sanctioned parties, including terrorists, narcotics traffickers, and designated persons or entities that promote the proliferation of weapons of mass destruction. Any proposed dealings (including indirect dealing through a third party) with an embargoed country and/or entities subject to U.S. trade sanctions are prohibited without prior review by the Legal Department.

ANTI-BOYCOTT

Vibrantz will not participate in or support economic boycotts that are not supported by the U.S. government. In particular, Vibrantz will not support or comply with the Arab League boycott of Israel.

Vibrantz will not, for example (1) refuse to do business with Israel; (2) furnish or agree to furnish information about business relationships with Israel; and (3) use a letter of credit requiring Vibrantz to participate in a boycott of Israel.

Boycott-related requests are sometimes made verbally or in documents related to a transaction.

Any request to participate in or to support an illegal boycott may need to be reported to the United States government, even if the requests are received by Vibrantz’s operations outside the United States. Any boycott request should be forwarded immediately to the Legal Department.

ANTI-MONEY LAUNDERING

People involved in criminal activities such as terrorism, drug trafficking, bribery, and fraud may try to “launder” the proceeds of their crimes in order to hide them or make them appear legitimate. More than 100 countries now have laws against money laundering, prohibiting transactions that involve proceeds from criminal activities. Similarly, many countries have laws against “reverse” money laundering, prohibiting the use of legitimate money to fund illegitimate activities, such as terrorism.

Vibrantz is fully committed to complying with all anti-money laundering and anti-terrorism laws throughout the world. It is Vibrantz’s policy to only conduct business with reputable parties involved in legitimate business activities using funds derived from legitimate sources.

INSIDER TRADING

In addition to being unethical and illegal, it is a violation of Company policy for directors, officers and employees, as well as members of their households or immediate families, to buy or sell Company securities (including bonds) while in possession of “material, non-public (insider) information.”

Information may be material if there is a likelihood that a reasonable investor would consider the information important in deciding to purchase, sell or hold a security. Information that is non-public has not been disseminated in a manner making it generally available to investors (i.e., via press release or public filing).

Examples of information that may be considered material include:

- Earnings and financial results prior to public release;
- Plans for mergers or significant acquisitions;
- Loss of important contracts or customers;
- Product developments or discontinuations; and
- Major changes in senior management or organizational structure.

REPORTING, RECORDS**EXTERNAL COMMUNICATION & FINANCIAL REPORTING**

Business and financial information should not be disclosed outside the Company. Only authorized personnel may speak as Vibrantz representatives about Vibrantz’s business with the press or at external events, conferences or trade shows.

Similarly, only personnel authorized by the Chief Executive Officer or Chief Financial Officer may speak on behalf of Vibrantz to members of the financial community.

REPORTING INTEGRITY AND RECORDS MANAGEMENT

Company records must be true, accurate, and complete. Such records include accounting records, expense statements, financial and research reports, and time records. Improper or fraudulent accounting, documentation, or financial reporting violate Company policy and may also violate applicable laws.

All Company records, in physical or electronic form, must be retained in accordance with Vibrantz's Record Retention Policy and applicable legal requirements.

It also is Vibrantz's policy not to alter or dispose of any records that need to be preserved for litigation, investigations or audits.

PROTECTION AND USE OF COMPANY INFORMATION AND ASSETS**PROTECTION OF INFORMATION AND ASSETS**

Information created, obtained or compiled by or on behalf of Vibrantz belongs to the Company, to the extent permitted by applicable law. Such information, as well as the physical assets of Vibrantz, are critical to the continuing success and operation of the Company and must be protected. You are expected to respect and safeguard the Company assets you use, including information, technology, computers, electronic devices, equipment, furniture, buildings, and vehicles.

The protection of Company information from unauthorized use, disclosure and destruction is the responsibility of all Vibrantz personnel. Company information should only be used for approved Company purposes. Appropriate approvals must be obtained for disclosure of information outside the Company.

The Company reserves the right to monitor the use of Company information and property to the extent allowed by law, including through the Company's information technology systems.

COMPUTERS AND OTHER INFORMATION SYSTEMS

Vibrantz encourages the use of electronic communications to share information, communicate effectively and exchange ideas. Examples of electronic communications include email, telephone, mobile phone, voicemail, instant messages, and video conferences. Electronic communications at Vibrantz are intended for business activities. Incidental personal use is permitted so long as it does not interfere with the employee's or any other person's work performance, or unduly affect Vibrantz's electronic communications systems.

Employees must not share User IDs nor allow unauthorized access to Vibrantz computers, networks, data or systems by anyone not employed by Vibrantz.

USE OF COMPANY INFORMATION FOR PERSONAL GAIN

As a result of your association with Vibrantz, you may have access to non-public information about our customers, suppliers and competitors. This may not be used for personal financial gain or for any purpose other than to perform your Vibrantz responsibilities. For example, you should not disclose or use, for your own benefit or the benefit of any other party, any physical or chemical formula, composition, mixture or blend of components, process, technique, or method that is proprietary to Vibrantz, or any customer lists, contracts or pricing information.

TRADEMARKS AND COPYRIGHTS

Our Company name and logo, our product names and logos, and our domain names are all valuable assets. Prior to commercialization, new product names and logos must be cleared by the Legal Department to ensure that their use will not infringe trademark rights of others. Improper or unauthorized use of one of our trademarks by another company or individual should be reported to the Legal Department. Trademarks owned by Vibrantz may not be used by individuals for their own personal purposes.

Copyrights protect original works of authorship (such as technical papers, news articles, photographs, software, videos, and artistic works) that are in fixed and tangible form. Our copyright policy is to honor the copyrights of others and we expect others to honor our copyrights. You may not copy, photocopy, reproduce (including electronic reproductions), or distribute or transmit by fax or other electronic media, any copyrighted work without the permission of the copyright owner.

With regard to computer software, Vibrantz will only copy and use purchased software in accordance with the applicable licensing agreement. You should contact the Information Technologies function with any questions related to copying and use of software in connection with your work for Vibrantz or for use on Vibrantz equipment or systems.

PATENTS AND INVENTIONS

Patents protect products, processes, equipment, compositions, and formulations. Vibrantz's policy is to honor the valid patents of others, and Vibrantz expects others to honor Vibrantz's valid patents.

Patents owned by Vibrantz may not be used by individuals for their own personal purposes.

TRADE SECRETS

Trade secrets can be defined as information that is not generally known and that gives an economic advantage. Vibrantz's trade secrets are valuable assets and must be properly protected.

There are many examples of trade secrets within Vibrantz. Some are technical, such as physical and chemical formula compositions and blends of components, production equipment, operating procedures, and analytical methods. Others are more commercial in nature, such as customer lists, pricing, business strategies, and research and development projects. All this information is considered proprietary to Vibrantz and must not be disclosed outside the Company, nor should this information be broadly discussed within the Company. Only Vibrantz personnel with a “need to know” to meet their Vibrantz responsibilities should be provided access to such information. The responsibility to protect and maintain the confidentiality of Vibrantz trade secrets and other proprietary information may extend beyond the term of your employment or other affiliation with Vibrantz.

DATA PRIVACY

Vibrantz is committed to respecting the privacy of its employees, customers and suppliers. It is the company’s policy that personal information and data that is transmitted, stored or processed be protected from unauthorized or unintended disclosure, used solely for legitimate business purposes and handled in accordance with law. Vibrantz has security measures and access control procedures in place to ensure that personal data are accessible only to those with direct responsibility in a relevant job function and who have a need to know. Vibrantz acknowledges that many countries in which it operates have specific data privacy laws regarding the treatment of personal data, and Vibrantz is committed to complying with these laws.

ENVIRONMENTAL, HEALTH AND SAFETY

EMPLOYEE SAFETY

We believe that the safety and health of our employees is of the highest importance. We seek to prevent accidents, injuries and occupational illnesses and promote healthy and safe lifestyles for our employees and their families.

ENVIRONMENTAL STEWARDSHIP

Our commitment to the environment goes beyond legal compliance and extends to several actions intended to reduce our environmental footprint through our operations, products and supply chain. In our operations, this commitment is reflected in our efforts to prevent pollution, reduce greenhouse gas emissions and conserve natural resources. We also design our products for the environment. Together, these efforts support Vibrantz’s overall sustainable business model.

COMPLIANCE

We have a worldwide Environment, Health and Safety (EHS) governance structure of people, policies and processes, designed to ensure compliance, responsible EHS practices and proactive incident reporting and response. This structure applies to both our operations and to the products we make. We strive to meet or exceed regulatory requirements, consistent with Vibrantz's commitment to respect and obey the laws, rules and regulations applying to our businesses around the world. We work to create a "zero incident" culture and to continuously improve our EHS performance through implementation of our EHS management system, which establishes a single set of EHS performance standards for all facilities worldwide.

POLITICAL ACTIVITIES

In the United States, no director, officer or employee is authorized to make political contributions using Vibrantz funds. In countries other than the United States, any contribution by the Company to a political party must be done in accordance with local law. No political contributions of any kind, either direct or indirect, and no reimbursement of political contributions shall be made by or on Vibrantz's behalf without the expressed authorization of the Legal Department.

WHERE TO GET MORE INFORMATION

The Vibrantz Ethics Hotline is designed to protect your confidentiality. Employees, contractors, and any non-Vibrantz person can submit concerns to the help line.

Disclosing your identity can help facilitate questions and, in some circumstances, may protect your individual legal rights. Vibrantz will seek to maintain the confidentiality of your identity and personal information, limiting disclosure to circumstances as necessary and appropriate.

Reports will be reviewed and investigated, and corrective or disciplinary action for violations will be taken as appropriate. Certain misconduct may be reported to the appropriate government authorities.

To reach the Vibrantz Ethics Hotline, please visit <https://www.lighthouse-services.com/vibrantz-ethics>.

Alternatively, you may call the following numbers:

Toll-free reporting from the United States and Canada: 1-800-423-4466

Toll-free reporting from international locations:

Argentina	0-800-222-0122
Australia	1800-088-555
Belgium	32-7-848-38-44
Brazil	0800-891-5672

China	10-800-130-0492
Columbia	01-800-710-2034
France	33-9-77-55-16-36
Finland	0800-413753
Germany	0800-180-8321
India	000-800-100-4364
Indonesia	001-803-015--201-1588
Israel	972-77-220-1447
Italy	800-78-2132
Japan	0053-113-0713
Republic of Korea	00308-13-1273
Malaysia	1-800-81-6266
Mexico	01-800-681-5359
Netherlands	0800-022-1726
Portugal	351-308-805-635
Romania	40-377-880-187
Russia	8 (800) 301-69-63
South Africa	080 098 2307
Spain	900-991-791
Taiwan	008-0114-8471
Thailand	001-800-132-009-123
Turkey	90-850-766-24-24
UK	0800-917-6863

LEGAL DEPARTMENT CONTACT INFORMATION

The Legal Department is available to answer questions about the Code or Vibrantz's compliance policies and to discuss concerns you may have about potential Code violations. To reach the Legal Department, you may call +1 832.241.2169 or email Compliance@Vibrantz.com. You can also mail any questions to:

Vibrantz Technologies Inc.
15311 Vantage Parkway W., Suite 350
Houston, TX 77032
USA
Attn: General Counsel

CODE OF ETHICS - CERTIFICATION FOR DIRECTORS, OFFICERS, AND EMPLOYEES

I hereby acknowledge receipt of a copy of the Code of Ethics for all directors, officers and employees of Vibrantz Technologies Inc. and its subsidiaries and affiliates (collectively, the “Company”).

By executing this certification, I certify that I have read and understand the Company’s Code of Ethics. I certify my commitment to uphold the principles and obligations of this Code of Ethics and agree to be bound by all provisions therein.

I further certify and agree that I am now, and at all relevant times have been, in compliance with its provisions, and acknowledge and accept that in the event that I become aware of any violation of its provisions, I am obligated to disclose such violation to the appropriate Company representative via the procedures described in the Code of Ethics.

Acknowledged and Agreed:

Signature

Printed Name

Date

Please return the completed and signed form to your local Human Resources Representative.