Code of Conduct

WORKING TOGETHER

DOING BUSINESS

BEING A GOOD CORPORATE CITIZEN

CREATING SUSTAINABLE GROWTH
This Code of Conduct applies to everyone at Kemira, in all our locations, and in all countries. Because it is important that everyone understands and follows the Code, this brochure explains its principles point by point, and includes examples of how it affects the day-to-day work of people here at Kemira. Keep the brochure for reference and refer back to it whenever you need to clarify how the Code should be applied.

If you have any questions about the Code you should ask your manager for advice and support. We also encourage you to speak up and report violations of the Code to our Ethics & Compliance function. All reports are strictly confidential.

If you are ever in doubt as to what to do, remember that doing the right thing is always the right thing for our business.
Integrity starts with me

At Kemira, our vision is to be the first choice in chemistry for water intensive industries. This means we must provide expertise, application know-how and chemicals that improve our customers' product quality as well as their process and resource efficiency. It also means that we must operate efficiently, safely and in a responsible way, while employing the best people with the right service attitude and a passion for our business.

Our Code of Conduct (the Code) is the foundation for our business conduct in Kemira. Our values are embedded in our corporate culture and connect each of us around the world. Our Code puts a framework around our values and reflects our commitments towards our key stakeholders.

It's about doing things the right way

We believe that how we do things is even more important than what we do. We have the Code to ensure you have the answers you need to do your job in a lawful and ethical manner. It doesn't just tell us how to work, but how to live our values and the Code principles in every decision and action we take. So, it's about doing things the right way. It's about making decisions guided by integrity and ethics. It's about keeping our promises and treating each other and our business partners fairly, and with respect.

Guided by internationally defined principles

Being a responsible business means supporting internationally defined principles on human rights, labor conditions, the environment and anti-corruption. We have committed to these principles by signing The United Nations Global Compact and by reflecting those principles in our Code. Kemira is a signatory of Responsible Care, the voluntary initiative of the global chemical industry.

It's our personal responsibility

We are all personally responsible for ensuring that our actions and decisions reflect our values and the Code principles. Also the third parties working as part of our operations must commit to the principles expressed in our Code. You are expected to raise concerns and ask questions when you see or hear something that could be against our values or the Code. That's the only way we can live up to our commitment to integrity.

Our success is closely related to our reputation, it's up to all of us to protect that reputation. Please take the responsibility to communicate with each other and our partners about the standards we've put in place with the goal of ensuring our company remains one of the best.

Jari Rosendal
President & CEO
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Quotations from Kemira employees about how they experience the Code of Conduct in their everyday life

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A selection of questions and answers to encourage you to think about how the Code applies to you in everyday life
Living with our Code

1.0 Our personal responsibilities

Our Code of Conduct provides us with the guidance and principles to adhere to the highest standards of integrity, legal compliance and ethical conduct. We have defined 19 principles that reflect our commitments towards our key stakeholders:

1) our work community
2) our customers, suppliers and markets
3) society and
4) investors.

These Principles are set out in the following chapters.

1.1 Purpose of the Code

Each of us at Kemira must act in accordance with our company values and the Code Principles and comply with company policies, laws and regulations. Our values and Code Principles are an expression of who we are and how we want to be perceived by our stakeholders. Laid down in this Code and in company policies and procedures, they are expected to be put into practice by all employees on a daily basis. This Code applies to every employee and manager, and to our Board of Directors; it governs every decision we make as part of our daily work.

1.2 As an employee you’re expected to

- Read, understand and follow our Code of Conduct and company policies
- Be transparent in any decisions and actions you take
- Not misuse use your position, company assets or deals for private gain
- Speak up and report any concerns or violations of this Code or our policies (see the available reporting channels on page 34)
- Ask your manager or Ethics & Compliance function if you are unsure how to act

1.3 As a people manager you’re expected to (in addition to the above)

- Lead by example
- Take the time to discuss and reflect on the areas of our Code that are specifically relevant to your team
- Create an environment where your team feels comfortable about raising concerns
- Listen carefully and try to answer any questions or concerns related to the Code
- Seek help from the available resources if you need to address questions or concerns
- Report any breaches of the Code to Ethics & Compliance function

Our Values

We are dedicated to customer success
Our customers are at the center of everything we do. With our offering and expertise we add value to their processes. We build long-lasting and mutually rewarding relationships with our customers and always aim to exceed their expectations.

We care for people and the environment
We put safety first in all our actions. We seek to be a role model for customers and partners in safety and environmental responsibility. We contribute to the well-being of people and communities around us.

We drive performance and innovation
We always want to do things better. We anticipate and adapt to changing requirements, welcome new ideas, and develop more efficient ways of working. We foster a can-do attitude, learn from experiences, and achieve results.

We succeed together
We engage everyone in building the future of our company. We work together across the organization towards common goals. We treat each other with respect and encourage open dialogue. We promote personal and professional growth, and acknowledge excellence.
Working together

2.0 Our commitments to the work community

The guiding principles of our values include putting safety first in all our actions, respecting others and succeeding together. Our success can be achieved only when we treat everyone, both within and outside our company, with respect.

2.1 Safety and wellbeing

Code Principle 1: We are committed to provide safe and healthy working conditions in all our locations for both our employees and contractors.

No matter where we work or what we do for our company, we put safety first in all our actions. All of us must contribute to the safety and wellbeing of the workplace by encouraging a behavior-based safety culture, being alert and aware of the policies, standards and procedures, and by reporting any incidents and unsafe conditions.

We support the physical and mental wellbeing of our employees and recognize the need for an appropriate balance between work and private life.

2.2 Diversity and inclusion

Code Principle 2: We respect the diversity, talent and abilities of others.

We at Kemira define “diversity” as all the unique characteristics that make up each of us: personality, lifestyle, work experience, ethnicity, religion, gender, sexual orientation, age, national origin, ability and other characteristics. We focus our efforts to attract, develop and retain a workforce that is diverse, and to ensure an inclusive work environment that embraces the strength of our differences. We do not discriminate or treat employees or job applicants unfairly in matters that involve recruiting, hiring, training, promoting, compensation or any other term or condition of employment.

2.3 Respect and harassment-free environment

Code Principle 3: We treat people with dignity, decency and respect.

All of us at Kemira must maintain a work environment in which people are treated with dignity, decency and respect. That environment is characterized by mutual trust and the absence of harassment, intimidation, oppression and exploitation. We do not use any form of forced or child labor.
2.4 Freedom of association

Code Principle 4: We respect freedom of association and collective bargaining.

Kemira employees have the right to choose whether or not to be represented by a trade union for the purpose of collective bargaining.

2.5 Privacy

Code Principle 5: We respect the privacy of our employees and other stakeholders.

We respect the privacy of the personal information to which we have access. We collect, process and retain personal information only for legitimate business purposes and in compliance with applicable laws.

All of us at Kemira who have access to personal information are responsible for handling such information with due care and safeguard it from unauthorized access and use.

“When you do the right thing, you don’t have to worry about the consequences.”

TONY ALEXANDER
HUMAN RESOURCES MANAGER
PARKWOOD, USA
How do I contribute to building and maintaining a respectful workplace?

- Treat other employees with respect, dignity and common courtesy.
- Don’t physically or verbally bully, intimidate or humiliate others.
- Humor is not the same for everyone – don’t tell stories or jokes that could be seen as inappropriate.
- Don’t distribute or display offensive material.
- Allow everyone to enjoy a workplace that is free from harassment and discrimination.
- Promptly report any inappropriate or unacceptable behavior you observe in the workplace.

What should I consider when dealing with personal data?

- Make sure you know when you are dealing with personal data – the definition covers any information that identifies or can be used to identify an individual.
- Only collect and process personal data that is relevant and actually needed to perform your working duties.
- Avoid requesting or holding more information than necessary.
- When collecting information, be fully transparent about how you intend to use the data and ensure the data is only used in ways the persons would expect.
- Make sure the data you process is accurate and always up-to-date.
- Don’t access or grant access to personal data for any other purposes than what’s authorized.
- Keep all personal data safe and secure.
- Destroy or delete data that is out of date or no longer necessary.
Doing business

3.0 Our commitments to customers, suppliers and markets

We comply with all applicable laws wherever we do business and treat all those in the marketplace with whom we come into contact with fairness and integrity. This includes our customers, agents, distributors, competitors, suppliers and contractors.

3.1 Product safety, quality and information

Code Principle 6: We aim to ensure that our products are made and developed to the highest ethical and safety standards and delivered to our customers according to our promises.

We follow the applicable laws and regulations on chemical product safety, including communication of the hazards and information about the safe use of chemicals. We must follow the applicable instructions regarding safe use of chemicals as part of our daily work.

We are committed to providing product and service quality to our customers. This means delivering the right product and service to the right customer, in time and safely, aiming to meet the promised resource efficiencies or customer product quality improvements.

We follow the highest ethical standards in acquiring and using information in our research and development processes.
3.2 Fair competition

Code Principle 7: We compete fairly.

We compete vigorously, yet fairly and ethically, and within the framework of applicable competition laws. Each Kemira employee must adhere to competition laws, regulations and Kemira policies. We respect the valid intellectual property and confidential information of others.

3.3 Trade compliance

Code Principle 8: We conduct our business according to applicable trade compliance laws and regulations.

We operate our business in an international trade environment which requires importing and exporting of products, other goods, services and information, from one country to another. We comply with applicable laws and regulations that affect our operations. Regulations include, but are not limited to embargoes and sanctions, customs import and export regulations, export controls, customs valuation, country of origin and preferential trade.

3.4 Anti-corruption, gifts and entertainment

Code Principle 9: We earn our business on merit and act with integrity wherever we operate. Our actions and decisions must always be made in the best interests of customers, our business and society.

We do not tolerate improper or corrupt payments made directly or indirectly to a customer, government official or third party, including facilitation payments, improper gifts, entertainment, gratuities, favors, donations or any other improper transfer of value. We engage only reputable sales representatives and other third parties who share the same commitment.

We make sure that gifts and hospitality always support a clear business objective and are accurately recorded, of reasonable value and appropriate to the nature of the business relationship.

“If you are unsure about some fact or behavior, it is always better to disclose and ask.”

FERNANDA DE MARCHI
GENERAL COUNSEL, LEGAL, SOUTH AMERICA
SÃO PAULO, BRAZIL
3.5 Business partners

Code Principle 10: We deal only with business partners who conduct business ethically and responsibly.

We seek productive, ethical and transparent relationships with our suppliers, agents, distributors, customers and contractors. We expect our partners to follow all applicable laws and regulations, and share the principles expressed in our Code.

3.6 Anti-money laundering

Code Principle 11: We do not accept, facilitate or support money laundering.

We comply with all laws that prohibit money laundering or financing for illegal or illegitimate purposes.

“When your partners apply the same high standards that you apply, business is easier.”

HANS PetEr Enzmann
VP MANUFACTURING, PULP & PAPER, APAC
Shanghai, China
How do I do the right thing?

FAIR COMPETITION

What can I do to promote fair competition?

• Never discuss sensitive topics (such as prices, terms of sale, bids, production levels, markets served etc.) with a competitor.
• Be cautious of restrictive practices in markets where Kemira is a market leader.
• Ensure you are familiar with the relevant competition or antitrust laws and our internal policies and procedures.
• Always contact your regional Legal team about any competition law issues or questions.

ANTI-CORRUPTION, GIFTS AND ENTERTAINMENT

What should I consider when offering or accepting gifts & entertainment?

• Never offer or accept gifts, travel, payment or hospitality in return for a favorable decision or business advantage.
• Never offer or accept gifts if it is in cash or cash equivalent (e.g. gift cards).
• Accept and offer only gifts and entertainment that are reasonable in cost, quantity and frequency. If the value of the gift or entertainment exceeds the limits set out in our Gift Policy, get an approval from your manager.

For more information, check our Gifts, Entertainment and Anti-bribery Policy or contact the Ethics and Compliance function or your regional Legal team.

BUSINESS PARTNERS

What should I consider when entering a relationship with a new supplier, agent or distributor?

• Ensure that the partner understands and commits to our Code of Conduct principles.
• Perform proper background checks to look for any red flags (such as parties that are sanction-listed, illegal past activities, questionable reputation).
• Evaluate the risk of corruption. Remember that Kemira can be held accountable for the actions of a third party!
Being a good corporate citizen

4.0 Our commitments to the society

We stand with our employees ready to respond ethically and with integrity to the needs of our surrounding communities and society.

4.1 Human rights

Code Principle 12: We respect the fundamental human rights.

We are committed to the principles of The Universal Declaration of Human Rights and the United Nations' Global Compact, and we expect our suppliers and business partners to share these principles.

We seek to ensure that materials used in our products come from socially responsible sources. We do not tolerate, contribute to, or facilitate any activity that fuels conflict or violates human rights.

4.2 Dealing with governments

Code Principle 13: We follow high ethical standards and act in a transparent manner when interacting with governments and public officials.

We are honest and accurate and follow Kemira’s policies and procedures and any applicable laws in our dealings with governments and public officials.
Environmental responsibility

Code Principle 14: We seek to lower the environmental footprint in our value chain.

We identify and look for opportunities to reduce any negative environmental impacts of our manufacturing or our products during production as well as during their lifecycle.

Political activity

Code Principle 15: We observe neutrality with regard to political parties and candidates for public office.

We do not take part in political activities nor make corporate donations to political parties or candidates. Neither the names nor the assets of Kemira shall be used to promote the interests of political parties or candidates.

“For me the Code is a guideline, a way to shape our habits. It’s supposed to help you. And it’s very useful in cases where you do not know how to proceed.”

OLGA BRZESKA
TEAM LEADER, CUSTOMER SERVICE
SUPPLY CHAIN MANAGEMENT
GDAŃSK, POLAND
How do I do the right thing?

**HUMAN RIGHTS**

How can I show respect for human rights in my daily activities?

- Ensure the safety of our products, safe work practices and safety of our operations.
- Ensure that the workplace and operations don’t pose any risks to the lives of Kemira employees, contractors or other people impacted by our operations.
- Allow everyone to enjoy a workplace that is free from harassment based on his or her gender, ethnicity, religion, age, ability or any other characteristic.
- Ensure just and favorable conditions of work and remuneration.
- When entering a relationship with a new supplier, agent or distributor, ensure that the partner understands and commits to our Code of Conduct principles.

**DEALING WITH GOVERNMENTS**

What should I consider when interacting with a public official?

- Make sure you recognize situations where you are dealing with a public official. The definition is wide and covers for example anyone acting in an official capacity for or on behalf of a governmental institution.
- Never offer gifts or business entertainment to public officials, or officials involved in public procurement.
- Provide only customary tea, coffee or simple lunches to public officials during business-related discussions or events.

**ENVIRONMENTAL RESPONSIBILITY**

How can I reduce the environmental impact of our value chain?

- Be aware of proper working procedures to avoid accidental leakages and spills into the environment from our manufacturing or during loading and transportation.
- Use any resources efficiently to protect our environment and reduce emissions and waste.
- Plan to use virtual collaboration first, to avoid the environmental impact and expense of travel. If you need to travel, consider train instead of flying or going by car.
- Train employees and customers on the proper use of our products because misuse could contribute to environmental and health damage.
Creating sustainable growth

5.0 Our commitments to the investors

Acting with responsibility and transparency goes hand-in-hand with protecting shareholder value. Each employee creates value for our shareholders and other investors by putting our company’s interests first, maintaining accurate business records, and protecting and properly using company resources, information and property.

5.1 Company assets and information

Code Principle 16: We use company assets and information with due care.

All of us at Kemira must use company resources honestly, efficiently and only for legitimate business purposes.

We must protect our resources from theft, loss, damage, or misuse. Resources include physical property, such as facilities, supplies, equipment, machinery, raw materials, finished products, vehicles and company funds. They also include intangible assets, such as company time, confidential information, intellectual property and information systems.

All of us must manage, use, disclose and distribute Kemira’s proprietary or confidential information according to our policies and actively protect our intellectual property. Any non-public information that suppliers, customers or other business partners entrust to Kemira must be managed in accordance with applicable legal and contractual requirements.

"As a leader, it is crucial that I can be an example by standing behind the Code of Conduct”

MERVI LIEDES, SITE MANAGER, PULP & PAPER ÄETSÄ, FINLAND
5.2 Conflict of interests

Code Principle 17: We make sure our decisions are taken independently of private interests or divided loyalties.

All of us at Kemira must make business decisions and conduct all business activities in the best interests of Kemira, not based on our own personal interests.

All of us must recognize and avoid conflicts of interest and abstain from any decision making that involves potential or actual conflict of interest. We must always disclose any potential or actual conflict of interest situation to the relevant management.

5.3 Transparency and reliable financial records

Code Principle 18: We apply high quality standards with regard to disclosure of financial and non-financial information.

All business transactions conducted on behalf of Kemira must be reflected accurately and fairly in the accounts of the company. As a listed company we have an explicit obligation to disclose without delay any significant information which might affect the value of our shares.

5.4 Inside information and insider dealing

Code Principle 19: We pursue the highest ethical standards with respect to inside information.

We protect confidential business information, especially when its disclosure could influence the share price of Kemira or another company. All Kemira employees must comply with all applicable laws, rules and Kemira policies relating to inside information and insider dealing.
How do I do the right thing?

COMPANY ASSETS AND INFORMATION

How can I protect company assets and information?

- Don’t leave your company devices or confidential information unprotected, e.g. keep your desk clear of papers and removable storage media and lock these away when you’re not using them.
- Don’t disclose company information on social media unless you have permission to do so.
- Use only company approved equipment, services and software.
- Avoid high-risk internet/e-mail use, e.g. by not clicking on suspicious links/attachments or using pirated or unlicensed material.
- Double check the validity of requests that concern company information to make sure the request is legitimate and you are authorized to provide such information.
- Report any suspected misuse of Kemira’s assets to your manager or Ethics & Compliance function.
- Follow Kemira’s IT policy and procedures.

CONFLICT OF INTEREST

A conflict of interest exists when financial or other personal incentives influence, or may appear to influence, your professional performance. Your responsibility is to:

- Avoid situations that may compromise – or may appear to compromise – your decision making.
- Inform your manager of any potential conflicts of interest involving yourself or others.
- Avoid giving preferential treatment to personal contacts such as friends or family.

TRANSPARENCY AND RELIABLE FINANCIAL RECORDS

What is my responsibility as a people manager when approving costs and expenses?

- Make sure that approval requests are valid, e.g. a legitimate business purpose exists, the necessary details are included and accurate, and that you’re using the right tool/channel for approval.
- Make sure you know what you’re approving and that you’re the right person to approve the request/contract/invoice.
- Ensure that both the approval request and approval are done in writing and stored.
- Follow Kemira policies and procedures in all financial transactions.
Speaking up

6.0 What do I do when something is not right?

6.1 Available channels to report concerns

We support a culture that encourages every individual to speak freely. We provide a safe, secure and confidential way to express concerns and questions when the usual ways are unavailable or inappropriate.

Every employee must raise any concern or activity which could be in violation of this Code, company policy or law:

- to the relevant line management
- to Kemira’s Ethics & Compliance function (e-mail: compliance@kemira.com); or
- via the Kemira Ethics and Compliance Hotline (links and local numbers are available in the intranet).

Each line manager must forward all reports made to line management to the Ethics & Compliance function without any delay. A person, who in good faith reports misconduct, will not be retaliated against for making such a report. Any person, regardless of position, who engages in retaliatory behavior will be subject to disciplinary action.

6.2 Investigating code violations

All allegations of potential violations of this Code made in good faith will receive a fair and comprehensive investigation conducted with the relevant internal and/or external assistance.

Any reporting of potential Code violations will be treated strictly confidentially and anonymously to the extent possible.

Violations of our Code, including failure to promptly report a known Code violation, or making a false report of a violation, may result in disciplinary action up to, and including, termination of employment.

You can report concerns about:

- Discrimination or harassment
- Workplace violence, threats or bullying
- Conflicts of interest
- Theft, fraud or bribery
- Environmental or safety issues
- Inappropriate gifts or entertainment
- Accounting or financial issues
- Code violations
- Policy violations
- Retaliation
- Other concerning behavior

Note that these are just examples, not an exhaustive list. Anytime you see or suspect something that could harm Kemira, our employees or our customers, speak up. By reporting misconduct, you help contribute to the ethical culture of our company.
"What matters is not what we say, but what we do. All managers should ask themselves: what kind of message am I sending to my organization with my actions and decisions?"

NIINA RATSULA
DIRECTOR, ETHICS & COMPLIANCE
HELNSINKI, FINLAND
Kemira is a global chemicals company serving customers in water intensive industries. We provide expertise, application know-how and chemicals that improve our customers’ product quality, process and resource efficiency. Our focus is on pulp & paper, oil & gas and water treatment.

WWW.KEMIRA.COM

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