



# Code of Conduct - our values in action

It's all about **the chemistry™**





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*Dongbek Park*

Chairman of the Board



*Jongho Park*

Group CEO & Executive Board Member



*Hans-Peter Wüest*

Group CFO & Executive Board Member



*Choung-Sik Kim*

Executive Board Member

Dear Colleagues,

Today, after more than 50 years, SONGWON is stronger than ever before. It is clear that our determination and commitment in implementing our strategy, combined with our ongoing efforts to strengthen the organization are paying off.

Whether you have been with SONGWON for many years or have just started your journey with us, each of you can be very proud of the contributions you have made and are making to the organization.

Dedicated, loyal, competent and hardworking, flexible, open and honest, you are the real force behind our success. SONGWON's management recognizes your commitment to our vision and knows that the successful future of SONGWON lies in your hands.

As a responsible leader in the industry, ethical, sustainable business practices are at the heart of our global organization. They lie behind everything we do and are a part of who we are, our history, our processes and most importantly the way we behave. They are crucial to our continued success.

Our Code of Conduct is key to maintaining SONGWON's strong reputation in the industry. It was put together to ensure that everyone working for the organization is fully aware of what is required of them, and how important complying with our behavior standards is to our day-to-day business and also to SONGWON's overall future.

We hope that you find it useful and continue to invest every effort to uphold the integrity of the organization that we continue to build.

Yours sincerely,

Jongho Park  
*Group CEO & Executive Board Member*

# Our core values

At SONGWON, we understand the daily challenges our customers encounter and what they require to meet the demands of their various industries. We strive to provide solutions that give them a competitive edge. With our highly advanced production processes and technology, our additives and specialty chemicals can be tailored to specification.

As a global leader it is important that we offer our customers innovative solutions, but more importantly that we conduct our daily business in a fair, ethical and transparent manner. Our professional image is determined by our internal and external behavior and our people's commitment and dedication to practice and represent our corporate values and beliefs in all areas of our daily business.

SONGWON's core values form the essence of our company. They are the character traits that make up our company's personality and give it a soul. Our "corporate soul" is what makes SONGWON unique.

## Entrepreneurship

Each of us truly lives SONGWON's entrepreneurial spirit, focusing on facts and figures. We stick to what we promise and transform innovative ideas to create additional benefit for our stakeholders.

## Value in people

We are a committed team driven and dedicated to advancing our customers' interests. Our people, products and processes bear the hallmark of SONGWON's reliability, trust and confidence in the future.

## Collaboration

We see ourselves as an extended team that is always within reach for our stakeholders to support, providing expertise and creating value added solutions.

## Excellence

We understand the needs of the markets, seeking areas of improvement and applying our experience to generate sustainable value to our stakeholders.





## About the code of conduct

Each and every SONGWON Group employee is personally responsible for maintaining the highest standards and upholding SONGWON's good reputation at all times.

The **Code of Conduct** is a **comprehensive guide to how we do business** and clearly outlines the rules everyone must follow, so that we all know what is expected of us.

## The BIG picture

We believe in playing fair – in doing what we do in an honest and straightforward way. We are here for the long run, so we would prefer to give up a short-term gain than compromise on our long-term reputation. We want the people we deal with to feel that they can trust and respect us.

## We are in this together

**Executives, managers and supervisors** – It is your job to make sure that all staff understand the Code of Conduct and follow it every day.

**Financial officers** – You are responsible for ensuring that all financial dealings are conducted **fairly and transparently**. Anything not in line with our code should be reported to SONGWON's Board.

**All employees** – It is everyone's duty to abide by the code. If you believe that someone is not following our Code of Conduct, please inform your manager/supervisor immediately. They are obligated to look into the problem as quickly as possible and take appropriate action. If you are not happy with how your manager has handled the situation, you can refer the matter to the CEO directly.

## Important!

Employees who breach SONGWON's Code of Conduct will face formal disciplinary action and in extreme cases risk termination of employment or even criminal prosecution.

**Not understanding SONGWON's Code or what it contains is not an acceptable excuse for breaking it.**

## The Code is clear

Through its Board of Directors, executives, managers, employees and contractors, SONGWON is committed to ensuring that, both the company and its representatives **behave in an appropriate, ethical and law-abiding manner at all times** and in **all areas of its operations**.

SONGWON expects and actively encourages anyone acting on its behalf to uphold and protect the **company's good reputation** with appropriate conduct at all times.

It is also our clear policy to **obey the laws and regulations of every state, territory and country** where we do business.

If you don't understand what a particular law or regulation means, **get advice from your manager** or ask them to get a legal opinion.

If you must make a decision before getting suitable advice, then please use good common sense. When **something doesn't feel right** or you have doubts, then it's safer **not do it**.

To maintain our high standards it is important that any **potential breach or non-compliance of the law or regulations is reported** and addressed promptly. Bring such instances to the immediate attention of your manager or when necessary report it to the CEO directly.

## Maintaining SONGWON's standards

All employees have a **duty to maintain and enhance the reputation of the company** at all times. This means that you must ensure that you do nothing at work or in your private life which could damage SONGWON's good name in some way.

By not following the principles of acting both **honestly and fairly in a legal and ethical** manner, you risk bringing the company into disrepute. Any serious breach of this Code, regardless of whether it is in your work or private life, will lead to the appropriate disciplinary action being taken against you.

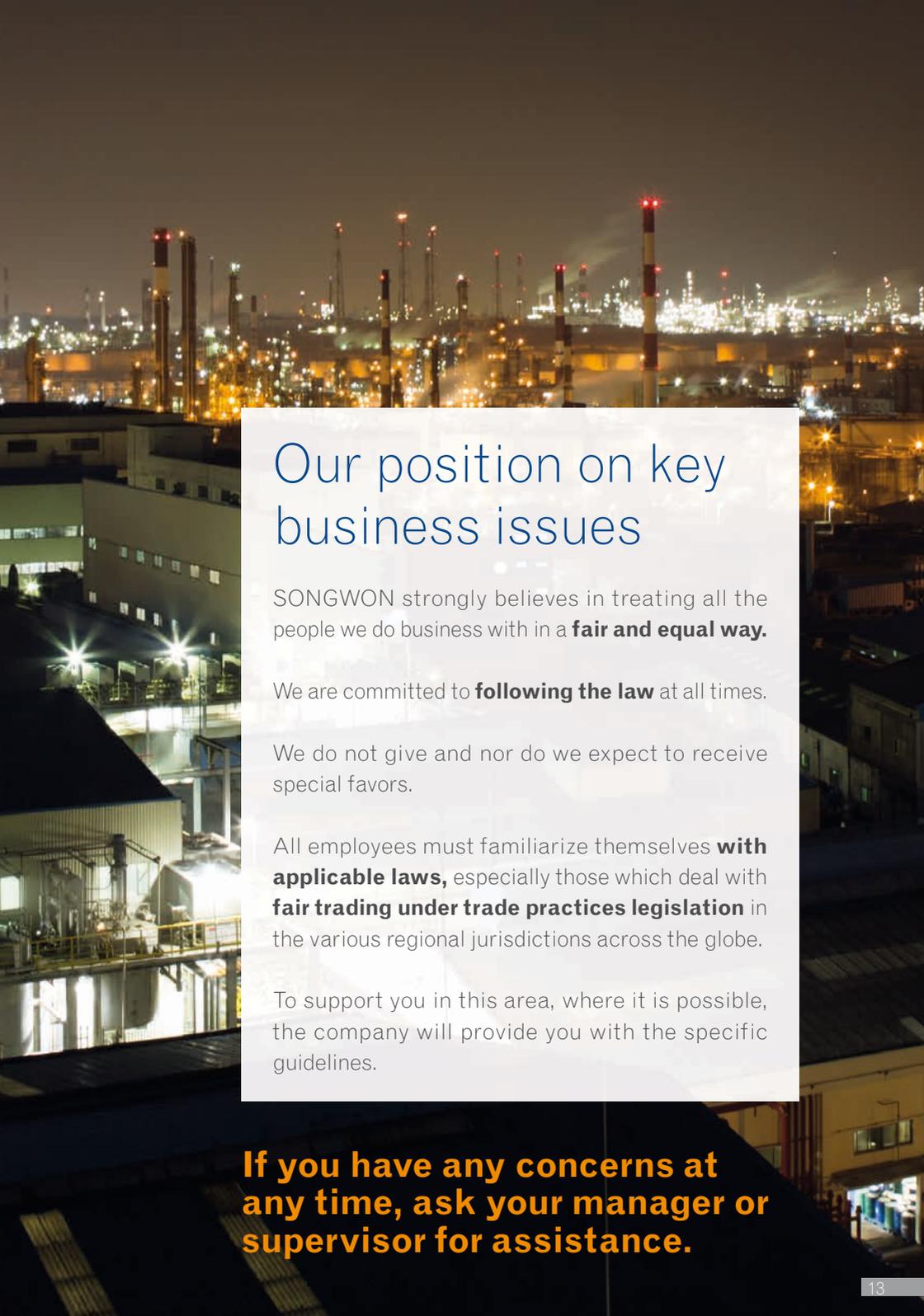
**Reputations, both a company's and a person's take many years to build but can be damaged in an instant.** All employees must recognize this and act appropriately and in line with our Code.

## Putting the Code into action

SONGWON's **leaders, managers and supervisors will ensure that employees comply with the Code** particularly those who have contact with other firms, customers and suppliers.

You are free to discuss any aspect of the SONGWON's Code of Conduct with your supervisor or manager at any time.

If you are uncertain whether the code applies to a certain problem or situation, please contact the CEO directly. He will confidentially provide you with the necessary advice or recommendations.



## Our position on key business issues

SONGWON strongly believes in treating all the people we do business with in a **fair and equal way**.

We are committed to **following the law** at all times.

We do not give and nor do we expect to receive special favors.

All employees must familiarize themselves **with applicable laws**, especially those which deal with **fair trading under trade practices legislation** in the various regional jurisdictions across the globe.

To support you in this area, where it is possible, the company will provide you with the specific guidelines.

**If you have any concerns at any time, ask your manager or supervisor for assistance.**

## Equal opportunities

**All SONGWON's employees** and those wanting to join our global team will be **treated exactly the same**, regardless of their race, age, color, religion, gender or mental/physical disability.

This applies to all SONGWON's terms and conditions of employment, e.g. transfers, training, compensation or termination.

**Harassment of any kind** whether based on race, age, color, religion, gender or disability is **not acceptable and will not be tolerated**.

We also do not tolerate any sexual, physical or mental harassment or any behavior which prevents or interferes with an employee's ability to perform their duties.

**We value diversity.** Employees from varied backgrounds enrich SONGWON's culture and support our success. We recognize **the value that all employees create** for the business and will provide equal opportunities for personal and career development.

## Health and safety

At SONGWON, we strive to **protect the health and safety of its employees, suppliers, customers and others** who may be impacted by our business operations.

Our priority is to provide a healthy, safe and clean working environment for our employees, contractors and everyone working or visiting our sites that meets or exceeds local regulations and established industrial practices.

**We all share this responsibility and commitment** – all of our executives, managers, supervisors, employees and subcontractors.

Please act immediately if you notice any **non-compliance with health and safety** standards and **raise any concerns** with your manager and your safety representative.



## The environment

SONGWON is an environmentally responsible company. As part of our Corporate Social Responsibility & Sustainability policy, we do not allow economic drivers to compromise our strong belief in the importance of protecting the environment or the health and well-being of our employees.

### **Corporate Social Responsibility (CSR) is an integral part of our business.**

CSR underpins our strategy. It helps us manage our impact on society and the environment, and contributes to a more sustainable way of doing business.

Economic, social and ecological considerations in all our activities are part of our social and environmental responsibility. CSR ensures that we consciously consider the direct and indirect impacts of our operations on all SONGWON's stakeholders – our employees, customers, suppliers, and the local community and leads us to adopt ethical and socially-responsible management approaches that are aligned with environmental considerations.

We **expect** everyone at SONGWON to continually work to improve the performance and the consistent quality of our products and how we do business as well as how we treat our people, the communities we serve and the environment around us.

We **expect** our employees to go beyond the minimum legally required standards, and to do everything they can to protect the environment. This includes **using recyclables** and **conserving** resources wherever possible.

We insist that **all safety laws** and regulations relating to the use, storage and transport of:

- dangerous goods
- waste treatment
- workshop runoff
- wash down areas
- underground fuel tanks
- equipment and machinery, etc.

at SONGWON's sites, warehouses, yards and offices **be strictly followed.**

To reduce the impact of heavy vehicles on the **environment**, **SONGWON** encourages employees to select **rail or coastal shipping services** wherever practical and affordable.

**SONGWON requests** that employees arrange for regular maintenance to be carried out on company vehicles to help **reduce vehicle pollution** and ensure SONGWON meets regulatory standards.



## Fair trading

SONGWON believes in competition and fair trade and the notion that expertise, knowhow and innovation are appropriately rewarded. All SONGWON employees are expected to **embrace** the concept of **fair trading** and **comply** with all **laws of competition** and **fair play**.

Specifically we insist that employees:

- abide by all applicable laws protecting fair trade
- refrain from engaging in activities and behavior that may be perceived as unfair business activity
- comply with all applicable antitrust laws including prevention, restriction or distortion of competition, direct or indirect fixing of prices or other trading conditions
- safeguard trade secrets and do not exchange or share confidential or SONGWON internal information with competitors
- do not abuse a dominant market position
- do not discriminate against trading partners, suppliers or direct competitors
- do not unjustly refuse to supply based on a personal objection/opinion.

## Money laundering

SONGWON **does not support** activities that encourage, support and facilitate international **money laundering** and the financing of illegal activities. All employees are **forbidden** to engage in any activity that relates to this or compromises our corporate position on money laundering activities.

## Trade control regulations

In many regions where SONGWON operates, there are trade control laws and regulations in place which restrict or prohibit the cross-border transfer of goods, services, technology, and certain international capital transactions and payments. These regulations may affect the export and import of goods, services or technology from, to or within these countries.

The consequences of being found guilty of breaching embargo and trade sanctions are serious. As a globally operating company, SONGWON abides with such regulations and will not support activities where such regulations are compromised, challenged or ignored.

All employees involved in the export or import of goods, services, technology or international capital transactions and payments **must be familiar** with the relevant trade control laws and regulations and **strictly observe them**.

Sanction lists are an official register which lists individuals, groups or organizations that have had economic and/or legal restrictions imposed on them e.g. when a country or regime is violating human rights, waging war or endangering international peace and security.

Trade or other business relations with individuals, groups or organizations on sanction lists **is prohibited**. SONGWON employees **will not enter into or conduct any trade** or other business relations with individuals on sanction lists.

## Insider trading

As an employee, you may acquire **information** that could **affect SONGWON's share price**, or the share price of another company if it became public knowledge. It is **strictly forbidden** to seek personal advantage or advantages for others through the use of in-house knowledge.

Employees are **not permitted to buy or sell shares** in the company or the other company, or **disclose any 'insider' information** to others.

**Substantial penalties** may be imposed by law upon an employee, and also possibly the company, if 'insider' information is acted upon or disclosed before it officially becomes public knowledge.

SONGWON's corporate governance guidelines and share trading regulations restrict SONGWON's **directors and executive officers** from dealing with the company's shares.

## Bribery and corruption

SONGWON **strongly prohibits** bribery and corruption in any of its business dealings, **regardless of any laws or local customs**.

Even a suggestion that SONGWON is involved in bribery or corruption of any sort has the potential to seriously impact the reputation of the group. In addition to severe disciplinary action or immediate dismissal, individuals involved in corrupt conduct may also be liable to arrest and possible imprisonment.

All **facilitation payments** e.g. payments made to procure routine services but not to influence any decision may breach the laws of several countries and are **highly discouraged**.

If such payments are made **employees must report them** to Group Management and disclosure requirements complied with.

## Gifts or favors

Employees should **not give or accept gifts or favors** from any firm or person with whom SONGWON does business with only a few exceptions.

Employees:

- may attend **business lunches or dinners** in the normal course of business but should keep these inexpensive and return the favor if appropriate.
- may give or receive **advertising novelties or Christmas gifts** if they have little or no monetary value.
- may **receive courtesy gifts or favors** which relate to **local customs**. Managers must monitor that these remain within a reasonable and acceptable level.

It is important that **any personal relationship does not compromise your working role** even if company suppliers or customers may be close personal friends.

Employees who are offered an **expenses paid trip** (whether business or pleasure), from a current or potential supplier, should **decline the offer or refer to the CEO** for approval.

Employees should be aware that most **government agencies** and departments **have strict guidelines** regarding gifts or favors and must avoid putting any government employee in a difficult or embarrassing position by offering anything not permitted by the government's guidelines.

**Under no circumstance should you compromise either the company's or your own position** in relation to gift giving or receiving.



## Expenses and claims

Employees should manage company expense accounts carefully.

Any behavior carried out just to ensure **personal gain is inappropriate and unacceptable** e.g. only selecting a specific travel company or accommodation to maximize frequent flyer points. Submitting expenses should be **done honestly and fairly**.

Employees representing SONGWON at a trade or business-related gathering may be **reimbursed for your legitimate business expenses** by the promoter, but you should not accept any fees for attending.

## Intellectual property rights

It is a **criminal offence** to breach the intellectual property ownership rights (including copyright) of any other person or company.

Employees who breach another's intellectual property rights or copyright can result in substantial penalties for SONGWON and themselves.

Employees **may not use software** that they know or have reason to believe is **unlicensed or pirated, or to pirate software** themselves.

## Use of company property

Employees must not use company property, equipment, services or assets unreasonably or simply to **achieve personal gain**. Inappropriate and unauthorized use is not acceptable and in some cases, may be considered criminal.

## Alcohol, controlled substances and weapons

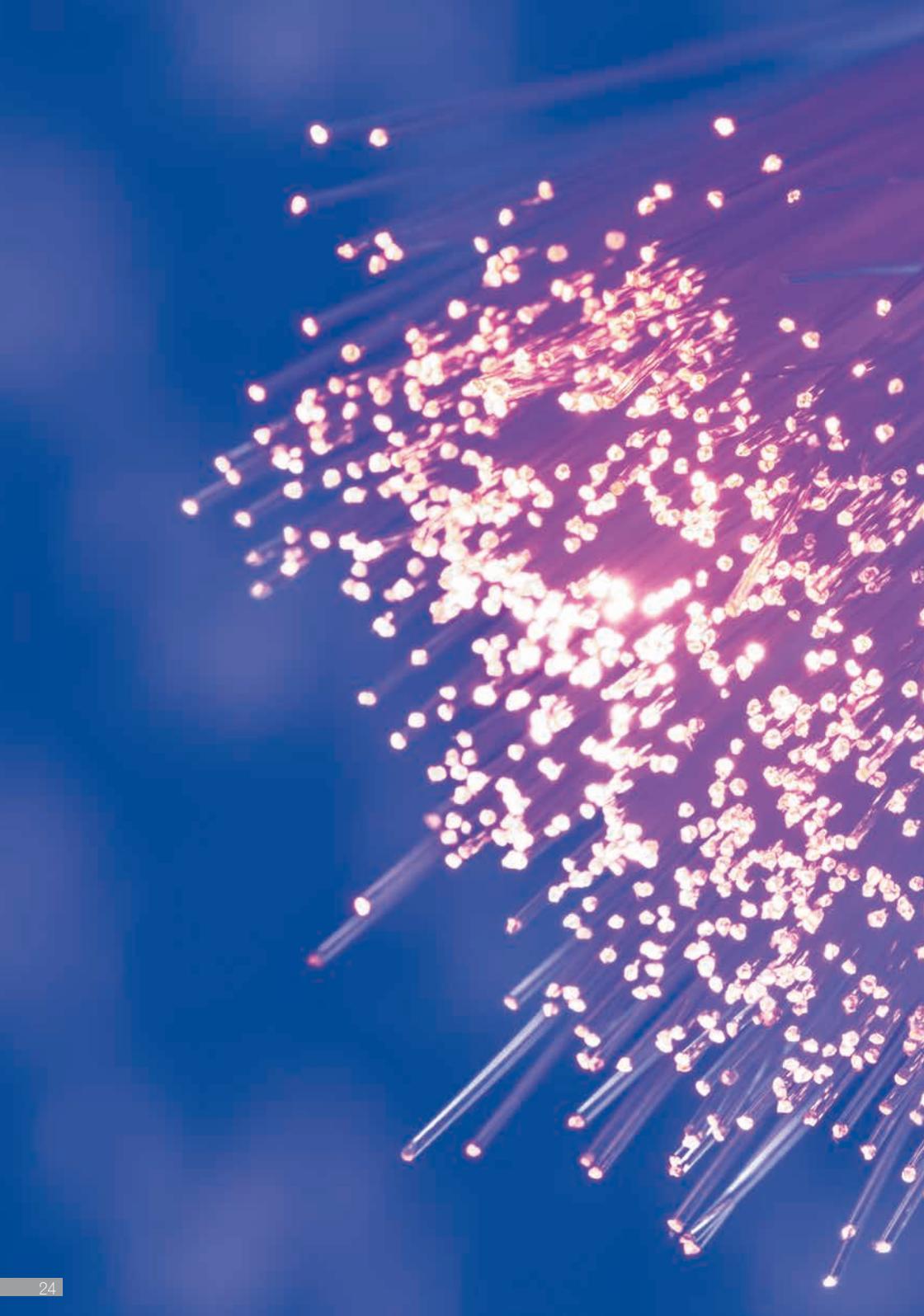
**Employees are required** to ensure that they are **fit and able** to perform their assigned work duties. **Substance abuse is prohibited.**

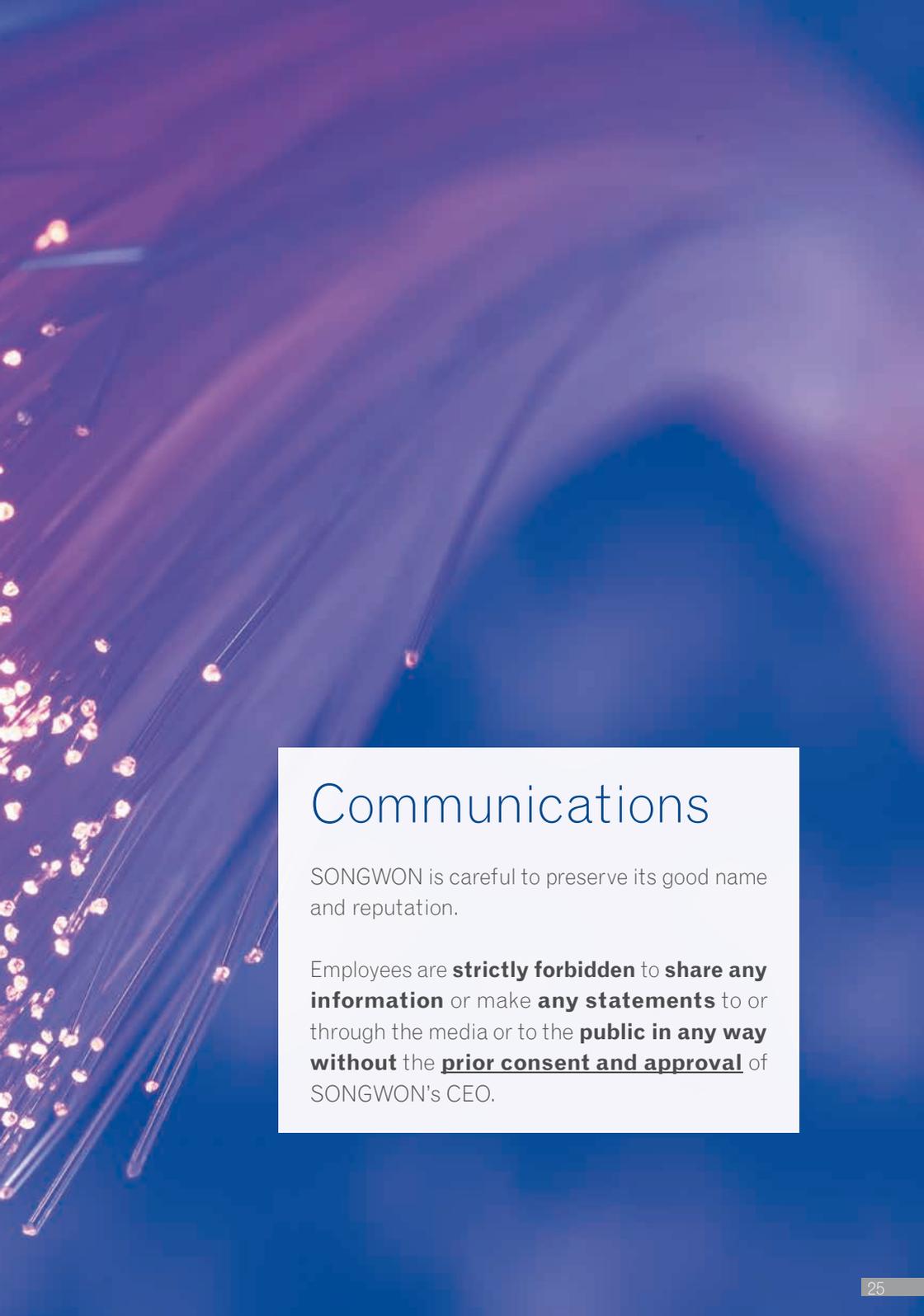
**The use, sale, possession, manufacture, dispensing or distribution of alcohol, unauthorized drugs or controlled substances by an employee on company premises is strictly prohibited.**

Employees who must take legally prescribed drugs and who are concerned that such drugs may impair their ability to safely perform their normal work assignments must consult with their physician immediately and advise their manager accordingly.

For celebrations or specific events, exceptions regarding alcohol consumption may be granted but only when specifically authorized in advance by an authorized executive member.

**The possession of firearms, weapons of any kind,** or any other dangerous or illegal items on SONGWON's premises or while carrying out company business **is strictly prohibited.** Certain chemicals and other agents required for SONGWON's operations are exceptions to this rule.





# Communications

SONGWON is careful to preserve its good name and reputation.

Employees are **strictly forbidden** to **share any information** or make **any statements** to or through the media or to the **public in any way** **without** the **prior consent and approval** of SONGWON's CEO.

# Confidential Company information

**Confidential information is valuable SONGWON property.** Employees should only share and/or use such information when authorized to do so.

At SONGWON, we expect our employees to keep all company and Group information confidential at all times. This includes all internal information such as: development projects, manufacturing methods, business plans, financial data, marketing and sales strategies, launch of new products, merger or acquisition activities etc.

**Every employee** has a **duty to protect any confidential information** they have access to or acquire. Knowing or having access to such information does not give you the right to disclose it.

All SONGWON employees are **legally bound to protect the company's interests** and secure the confidentiality of any information obtained while employed at SONGWON.

**Under no circumstances** may any confidential information be used **during or after your employment with the company** to achieve personal gain, an advantage for a competitor or any other external party.

SONGWON will do all that is possible to **protect information** which might affect the company's existence, help competitors gain an advantage or harm employees or investors.

## **External communication**

SONGWON communicates in an open, direct, transparent and accurate manner with the public and does not give special treatment to any individual or institution. All information relating to our performance or prospects must be communicated to the financial community as a whole and at the same time in keeping with the relevant regulations.

**Employees must not discuss** matters relating to the Group **with the media.** Our Communications team are responsible for coordinating any announcements, statements or responses to the media's questions.

All other media contact, e.g. for marketing/sales purposes, must be handled according to SONGWON's established process and coordinated and approved by the CEO.

### **Government relations**

SONGWON supports dialogue between the business and government authorities at local, national and international levels to promote and implement relevant legislation, regulations and agreements, stakeholder rights protection etc. while safeguarding a healthy and competitive business environment.

**All such relationships** with governments and their representatives **must be coordinated by SONGWON's Board of Directors.**

## Internal communication

At SONGWON, we foster an environment where open and honest communication is valued, and support candid, direct and transparent communication with all employees, regardless of role or title. Open interaction enables us to examine every opportunity to improve our business, to better serve the needs of our customers, and to tap into the potential within us all.

We encourage everyone at SONGWON to **express their opinions** in a **respectful manner** and to listen carefully to colleagues as well as customers and suppliers. We expect our employees to communicate and act with integrity and to treat others with the respect they expect to receive themselves.



## E-mail communications

E-mails are a fast way to communicate especially when people are working in other regions and time zones. However, as with all forms of communication there are potential drawbacks. We expect all our employees to follow these essential guidelines.

- **Keep emails short and to the point**  
Keep the tone of your email respectful and polite at all times. Aggressive, rude or threatening emails are not acceptable.
- **Limit email content to the essentials**  
Emails should **not be used** to discuss a subject in detail.
- **Consider whether email is the most suitable way to send information or documents**  
Do not use emails to send highly confidential or proprietary information or documents to avoid a security breach or risk of the information getting into the wrong hands.
- **Avoid sending too many emails**  
Only send emails when they are important and only to the people who need such information and avoid flooding colleagues' mailboxes with information irrelevant to them, whether directly or in cc.
- **Answer emails within a reasonable period of time**  
It is not acceptable to ignore emails and force people to send reminders to you.
- **Do not mark all of your emails as 'high priority'**  
It is disrespectful to alert someone that your email is 'high priority' when it is not.
- **Avoid sending email blind copies (bcc)**  
To maintain the transparent and open communication we value at SONGWON, blind copies should only be sent in very exceptional circumstances.

## Online and social media

New communication channels such as social networks and communities have become standard and brought new challenges.

**SONGWON's employees must be aware** that today's information is easily linked. We expect our employees to exercise caution and understand that what is acceptable to include on your private online presence may not be acceptable on your public or business presence.

Employees are encouraged to follow these simple do's and don'ts.

### **Things to do:**

- **Think before you act**

Remember once information is out in the digital world, it stays there.

- **Keep company policy in mind at all times**

As a SONGWON employee, even when you privately communicate in the digital world outside of work, the code of conduct still applies to you.

- **Maintain the principles of open and honest communication**

Ensure that you always make it clear whether you are acting in your professional function or on your personal behalf.

- **Be careful with personal information**

The digital world can be dangerous so don't take risks with your own or other people's personal details.

### **Things not to do:**

- **Avoid damaging SONGWON's reputation**

Do not do anything online privately which can be linked to your business life and could negatively affect SONGWON.

- **Resist from privately using your company email or professional identity**

For everything outside of legitimate company activity, use only your private email and identity.

- **Refrain from revealing company information of any kind**

Your private online presence should not be used to pass on information about SONGWON.

- **Ensure that your private online activity does not impact your performance**

Your daily work activities or those of your colleagues should not be negatively affected by your online activity.

- **Act hastily if confronted with a tricky or risky issue**

Responding to something too quickly and without caution can be risky in the digital world and can damage both yours and SONGWON's reputation. If you are unsure about anything relating to online activity, please seek immediate guidance from your manager.

**Abuse of  
Business Assets  
for Private  
Interest**



**Environmental  
Hazards**



**Insider  
Trading**



**Disclosure of  
Confidential  
Information**



You must help  
SONGWON keep  
its spotless record  
for **NO:**

**Money  
Laundering**



**Improper  
Use of  
Software**



**Discriminat  
or Harassm**



**Anti-Trust  
Violations**

**Bribes**

**Conflicts of  
Interest**

**Accounting  
Fraud**

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## Contact details

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For further information, please go to:

[www.songwon.com](http://www.songwon.com)

It's all about **the chemistry™**

