

Monument Chemical Code of Business Conduct Ethics

Purpose

Monument Chemical counts on all our businesses and employees to honor, enhance and expand our reputation by representing Monument Chemical well in all interactions. We are committed to **honesty, integrity and high ethical standards** in all that we do. **Integrity** is essential to how we do business. This Code of Business Conduct sets forth the principles that guide us all to **make decisions that reflect our high standards of character** in the course of performing our jobs. The Code is not intended to be an exhaustive list and may be supplemented by more detailed policies and procedures. Using this Code of Business Conduct and Ethics, Monument Chemical's other policies and procedures, as well as applicable federal and state regulations, will support employees in their exercise of good judgment while fulfilling their daily responsibilities.

At Monument Chemical, we value building long-term relationships with customers and vendors based on mutual respect and trust. A team approach to management allows Monument Chemical to provide creative and effective solutions to issues affecting our customers and their industries.

Monument Chemical's Code of Business Conduct guides the way we conduct business across Monument Chemical. This Code applies to all employees of Monument Chemical and its subsidiaries. Individual Monument Chemical companies may elect to have more specific versions of this Code of Business Conduct and Ethics.

Scope

This Code has been developed to communicate Monument Chemical's expectations to all employees, in order to promote the following conduct:

1. Fair treatment and respect for our Employees
2. Compliance with Safety and Environmental requirements
3. Proper business gifts and entertainment
4. Fair competition (avoidance of anti-trust issues)
5. Avoidance of corruption and bribery
6. Avoidance of conflicts of interest
7. Protection of confidential information and intellectual property
8. Accurate and timely financial and other company records
9. Proper use of company assets
10. Proper use of company communication and information technology mechanisms
11. Understanding of your role and responsibility for compliance with the Code
12. Prevention of wrongdoing, and accountability for violations of the Code
13. Prompt reporting of suspected violations of the Code

1. Fair Treatment and Respect for our Employees

The most critical element to our success is our employees. Everyone should be treated fairly and with dignity. All employees should have the opportunity to contribute to their fullest potential.

Monument Chemical fosters a work environment that promotes equal opportunity, dignity and respect. Our policies promote equal employment opportunity without discrimination or harassment on the basis of race, color, religion, creed, age, gender, sexual orientation, national origin, citizenship, disability, pregnancy, veteran status, genetic information or any other characteristic protected by law. We expect that all relationships among persons in the workplace will be business-like and free of bias, harassment and violence.

Misconduct, including discrimination, harassment, retaliation or other forms of unprofessional behavior will not be tolerated and may lead to disciplinary action up to and including termination.

2. Compliance with Safety and Environmental Requirements

At Monument Chemical, we are dedicated to designing, constructing, maintaining and operating facilities that protect our people and physical resources. It is our policy to comply with applicable safety and environmental requirements, to provide and require the use of adequate protective equipment and measures, and to insist that all work be done in a safe and responsible manner. It is the responsibility of each employee to follow all company policies and procedures related to workplace safety and compliance.

Monument Chemical is committed to minimizing the impact to the environment. We work to continuously improve our environmental performance by setting and working toward quantifiable goals that reduce the environmental impact of our activities. We will follow applicable environmental laws and regulations in the countries where we operate.

3. Proper Business Gifts and Entertainment

Monument Chemical's business decisions are made on merit. Therefore, we will never give or offer, directly or indirectly, anything of value to a third party, including a government official, political party or candidate, that will corruptly influence that person's/entity's business decision or allow an unfair advantage. Conversely, an employee may not accept a gift, favor or service of more than modest value from a third party. Questions regarding what constitutes "modest value" or whether a business gift or entertainment activity is a permissible business expense should be directed to Human Resources.

Examples of items considered to be modest value or below include:

- Acceptance of gifts based on family or personal relationships;
- Acceptance of meals, refreshments or entertainment of reasonable value in the course of a meeting or event held for bona fide business purposes;
- Acceptance of promotional material of nominal value such as pens, pencils, note pads, key chains, calendars, and similar items.

Monument Chemical encourages its employees to become involved in civic affairs and to participate in the political process. However, employees' participation and involvement must be on an individual basis, on their own time, and at their own expense. Unless authorized, employees who participate in partisan political activities should not suggest or state that they speak or act for Monument Chemical. In the United States, federal law prohibits corporations from donating corporate funds, goods or services (including employees' work time), directly or indirectly, to candidates for federal offices. Local and state laws also govern political contributions and activities as they apply to their respective jurisdictions. Similar laws exist in other countries.

4. Fair Competition (avoidance of Anti-Trust issues)

Monument Chemical is committed to the continuation of free enterprise and the legal and regulatory frameworks that support it. Therefore, we recognize the importance of laws that prohibit restraints of trade that would damage economic activities and support unethical business practices.

Antitrust laws are designed to prohibit practices that might unreasonably restrict competition. These laws deal with agreements and practice “in restraint of trade,” such as price fixing and boycotting suppliers or customers. They also prohibit (i) pricing intended to drive a competitor out of business; (ii) disparaging, misrepresenting or harassing a competitor; (iii) stealing trade secrets; (iv) bribery; and (v) kickbacks.

It is our policy to comply fully with antitrust laws. You are prohibited from engaging in practices that violate antitrust and competition laws. If you have any questions or concerns about the propriety of certain business practices, please consult with your supervisor or your Human Resources or the Corporate Counsel.

The following are some key points to keep in mind as you conduct business:

- Embrace competition; don’t avoid it.
- Deal honestly, directly, and fairly with all customers, competitors, and suppliers.
- Express yourself carefully, professionally, and accurately in all business communications, especially emails.
- DON’T agree with a competitor on prices, discounts or rebates, credit terms, sales territories, customers, suppliers, output or manufacturing levels, or distribution practices.
- DON’T share pricing, cost, or other competitive information with any competitor or trade association without review and approval by the Corporate Counsel.
- DON’T discuss competitive information with competitors, absent a legitimate business purpose (such as a joint venture or other business transaction) and narrowly confine all discussions to the subject matter of the transaction.
- If you are at a meeting with competitors where prices, sales territories, customers, distribution practices, or other competitive information is unexpectedly discussed, (1) leave promptly, (2) make your departure obvious to those who remain, and (3) promptly contact the Corporate Counsel
- DON’T attempt to obtain proprietary or confidential information directly from a competitor, and DON’T use any improper means such as misrepresentations or hiding your identity in gathering competitive information.
- ALWAYS contact the Corporate Counsel if you have any questions, if you are concerned that something might lead to trouble, or if something just doesn’t feel right.

In all of our business dealings with customers, suppliers and competitors, we will:

- Avoid any unfair or deceptive practice and always present our products in an honest manner.
- Treat all customers and suppliers honestly, fairly and objectively.
- Select suppliers based on merit, and set the expectation that we expect suppliers to compete fairly.
- Never comment on a competitor’s product without a good basis for such statements.
- Comply with all laws, including those prohibiting agreements or understandings with competitors to fix prices or other sales terms, coordinating bids or dividing sales territories, customers or product lines. These types of agreements with competitors are generally illegal in the United States and many other markets where we conduct business.

5. Avoidance of Corruption and Bribery

In addition to the guidance regarding Business Gifts and Entertainment, and Fair Competition, Monument Chemical sells products internationally, and sells to government agencies both domestically and internationally. This subjects Monument Chemical to additional requirements of the Federal Acquisition Regulations and the US Foreign Corrupt Practices Act. Individual states and countries have similar and sometimes more stringent requirements. Monument Chemical employees involved in international operations and/or sales to governmental entities have additional requirements regarding business conduct and ethical behavior, intended to avoid even the appearance of wrong doing.

6. Avoidance of Conflicts of Interest

Monument Chemical expects its employees to conduct business according to the highest ethical standards of conduct. Employees are expected to devote their best efforts during working time to the interests of Monument Chemical. Business dealings that appear to create a conflict between the interests of Monument Chemical and an employee are unacceptable. Monument Chemical recognizes the rights of employees to engage in activities outside of their employment, which are of a private nature and unrelated to our business. However, the employee must disclose any possible conflicts so that Monument Chemical may assess and prevent potential conflicts of interest from arising. A potential or actual conflict of interest occurs whenever an employee is in a position to influence a decision that may result in a personal gain for the employee or an immediate family member as a result of Monument Chemical's business dealings, such as outside employment with a customer, supplier or competitor, having a significant financial interest with same, or exploiting one's position with the company for personal gain. Although it is not possible to specify every action that might create a conflict of interest, this policy sets forth those that most frequently present problems.

7. Protection of Confidential Information & Intellectual Property

The protection of confidential business information including financial information, trade secrets, product information and customer-related data not otherwise available to persons outside our company, is vital to our interests and success. Any employee who discloses trade secrets or confidential business information (any trade secret or proprietary confidential information regarding our customers, business partners or vendors, training materials, financial data, etc.) without authorization may be subject to disciplinary action up to and including termination and legal action. This Code is in addition to the provisions of any confidentiality or similar agreement you may have signed in consideration of or during your employment with Monument Chemical. Additionally, the attached Intellectual Property, Non-Disclosure/Confidentiality, Non-Solicitation and Other Agreements Addendum is made part of this Code of Business Conduct and Ethics.

8. Accurate and Timely Financial and other Company Records

Monument Chemical relies on our accounting records to produce reports for our management, creditors, governmental agencies, and others. We are committed to maintaining books and records that accurately and fairly reflect our financial transactions. Each employee must maintain accurate and fair records of transactions, time reports, expense reports and other business records.

In this respect, the following guidelines must be followed:

- No undisclosed or unrecorded funds or assets may be established for any purpose.
- Assets and liabilities of Monument Chemical must be recognized and stated in accordance with our standard practices and Generally Accepted Accounting Principles ("GAAP").
- No false or artificial entries may be made or misleading reports issued.
- No false or fictitious invoices may be paid or created.

It is the responsibility of each employee to uphold these standards. Employees are expected to cooperate fully with our internal and external financial auditors. Information must not be falsified or concealed under any circumstances, and an employee whose activities are the cause of the creation of false financial reporting will be subject to disciplinary action, including termination.

9. Proper Use of Company Assets

Company funds and all other assets of Monument Chemical are for company purposes only and not for personal benefit. When an employee's position requires spending company funds or incurring reimbursable travel and living expenses, the employee is expected to use good judgment on Monument Chemical's behalf to ensure that all expenditures incurred are fair and reasonable in the circumstances and in accordance with all company policies and procedures.

Monument Chemical's facilities, equipment, vehicles and supplies are to be used for conducting company business or associated purposes specifically authorized by management during working time. This applies to all equipment and supplies, including computers, software, and other office supplies and equipment. All employees should protect Monument Chemical's corporate assets and ensure their efficient use.

10. Proper Use of Company Communication and Information Technology Mechanisms

All employees are required to use Monument Chemical's communication resources in a lawful manner. This includes company email, voicemail, network drivers and internet access. All communication and information technology systems are the property of Monument Chemical. To ensure that the use of the Company's communications systems are consistent with legitimate business interests, the Company retains the right to monitor the use of such resources from time to time, and employees hereby consent to such monitoring.

Company communication resources shall be used for business or job-related purposes during working time. Any personal use of Company email must be limited to non-working time (e.g., breaks and lunch periods) and be in compliance with all other Company policies (including but not limited to non-discrimination and anti-harassment policies or any provision of this Code).

There is never a reason to share our confidential business information with third parties, without prior authorization. This includes such confidential business information as strategies, operational plans, forecasts or information that is considered a company trade secret or confidential or proprietary business information. Thus, employees are prohibited from transmitting or posting such information outside the organization without prior authorization. Accordingly, use caution in selecting material for transmission. Without notice, Monument Chemical may review any material created, stored, sent, or received in its network or through the Internet or any other company communication system.

It is generally not Monument Chemical's intent to monitor internet access or messages on voicemail and e-mail systems. However, Monument Chemical reserves the right to do so in appropriate circumstances, consistent with applicable laws and regulations.

Use of computer resources for any of these activities is strictly prohibited:

- Viewing, transmitting, retrieving or storing material that may be considered in violation of Company policies, such as the nondiscrimination and anti-harassment policies; accessing sites containing sexually explicit or pornographic material, or other unlawful material.
- Transmitting any messages containing discriminatory or harassing remarks about an individual or group's race, color, religion, national origin, age, gender, disability or other legally protected characteristic.

- Disseminating or storing commercial or personal advertisements, promotions, destructive programs (that is, viruses or self-replicating code).
- Using or copying software in violation of a license agreement or copyright.
- Using company communication systems for any other purpose which is illegal.

In handling Monument Chemical's information or information owned by a third party and/or licensed by Monument Chemical, employees should comply with copyright laws, computer software licensing agreements, and relevant company policy. Information technology representatives can provide advice and assistance in protecting computer-based information in accordance with Monument Chemical's policies on information security.

Nothing in this Code, however, is intended to prevent employees from discussing the terms and conditions of their employment, or from engaging in concerted activity protected by law.

- **11. Community Involvement and Social Responsibility:** We support our employees' rights to express their opinions in a public forum and encourage engagement with the communities in which we live and work. Employees' behavior in the community and in social media forums should avoid adversely impacting the Company's reputation, customer or vendor relationships or relationships with the community or otherwise risking violation of this Code. When in doubt ask your supervisor or HR leader for guidance.

12. Understanding of your role and responsibility for compliance with the Code

All employees are required to comply with applicable governmental laws, rules and regulations wherever Monument Chemical does business. This is in addition to company-specific work rules, policies and procedures.

All employees are expected to work in a cooperative manner with management/supervisors, coworkers, customers and vendors to follow consistently both the meaning and intent of this code. Managers and leaders are expected to ensure that our business processes and practices reinforce the Code of Business Conduct. Additionally, managers and supervisors are expected to serve as positive role models in the course of their work duties by establishing and adhering to high ethical standards and to create an ethical culture by encouraging and rewarding actions that are consistent with the Code.

The Code of Business Conduct cannot provide definitive answers to all questions. We must rely on each person's judgment and integrity. You should seek guidance when a situation may not be clear. Your supervisor or Human Resources Department will respond to questions and issues of interpretation about the Code.

Section 1.0.13 Prevention of wrongdoing, and accountability for violations of the Code

Monument Chemical takes these provisions of the Code of Business Conduct very seriously, and we will treat any violations of this Code accordingly. A failure by any person to comply with applicable laws, rules or regulations governing our business, this Code or any other policies or requirements may result in disciplinary action up to and including termination and, if warranted, legal action. The intention of this Code is, however, preventive in nature, by providing employees with knowledge and understanding sufficient to avoid any violations or wrongdoing.

Section 1.0.14 Prompt reporting of suspected violations of the Code

If you have any questions or concerns about compliance or matters discussed within this Code, talk with your supervisor or your Human Resources team. You are expected to promptly report any violations of this code to your supervisor, Human Resources Department or through the Monument Chemical Ethics Hotline. Failure to

promptly notify a supervisor or Human Resources Department of a violation of this Code is a breach of the Code and may result in action by Monument Chemical.

You can discuss your concerns without fear of any form of retaliation. When you report a violation of the Code of Business Conduct through the established procedures:

- You will be treated with respect.
- Your concerns will be taken seriously. If your concerns are not resolved at the time of your report, you will be informed of the outcome if you provide your contact information.
- You will not be required to identify yourself. However, specific information regarding the concern allows us to more swiftly respond to issues raised.
- Your communication will be protected to the greatest extent possible.

Ethics Hotline: IntegraReport

Voice Hotline: 1-855-858-3344

Online: www.IntegraReport.com

Section 1.0.15 Other Considerations

This Code is intended to be interpreted or applied in any manner that is consistent with an employee's rights to communicate under any law.

The application of the Code shall be subject to any restrictions or rights that may arise from the law in any locality, state or country in which Monument Chemical operates.

ADDENDUM TO MONUMENT CHEMICAL CODE OF BUSINESS CONDUCT AND ETHICS

INTELLECTUAL PROPERTY, NON-DISCLOSURE/CONFIDENTIALITY, NON-SOLICIATION, AND OTHER
COMMITMENTS

Intellectual Property: You must agree to make prompt, full and complete disclosure to Monument Chemical and to assign to Monument Chemical the entire worldwide right, title and interest in and to any and all inventions, developments, concepts or ideas made or conceived by you during the term of or in connection with your employment at Monument Chemical (whether during business hours or otherwise and whether on Company's premises, at Company's expense, using Company's materials/labor or otherwise), which are in any way within the scope of your employment or related to Monument Chemical's business. Such intellectual property shall include, without limitation, patentable and unpatentable inventions, ideas or improvements. You further agree that personal use of such intellectual property or a transfer of such intellectual property to a third party is a violation of this Code.

Non-Disclosure/Confidentiality: You agree that you will not without prior approval, disclose, directly or indirectly, use, divulge or make accessible to any person any non-public company confidential information during the term of your employment or at any time in the future without limit to your dates of employment.

Non-Solicitation: During the term of your employment and for 1 year after your employment ends, you will avoid any activity that results in 1) any Monument Chemical employee terminating his or her Monument Chemical employment and entering into an employment relationship with another business with which you are associated; or, 2) any existing or prospective Monument Chemical customer ending their business relationship with Monument Chemical and entering into a business relationship with another business with which you are associated.

Other Agreements: You agree to honor any other agreements to which you are committed in relation to your employment, including agreements related to non-competition, inventions, copyrights and stewardship of company property, among other agreements.

MONUMENT CHEMICAL CODE OF BUSINESS CONDUCT AND ETHICS EMPLOYEE ACKNOWLEDGEMENT

Monument Chemical Code of Business Conduct and Ethics outlines expected behaviors of all Monument Chemical employees. Monument Chemical will conduct its business in full compliance with all applicable laws and regulations, and with honesty, integrity and high ethical standards. Integrity is the foundation for all company relationships, including those with customers, suppliers, communities and our employees. The highest standards of ethical business conduct are required of Monument Chemical employees in the performance of their company responsibilities. Employees will engage in activity that is consistent with these standards and will avoid behaviors and situations that may raise questions as to the company's honesty, impartiality, reputation or otherwise cause embarrassment to the company.

As an employee of a Monument Chemical company, I will ensure that:

- I will avoid engaging in activity that creates a conflict of interest for me or the company.
- I will avoid situations and behavior that take advantage of my Monument Chemical position to seek personal gain through the use of non-public Monument Chemical information or abuse the trust placed in my position.
- I will follow all restrictions on use and disclosure of information, including protecting Monument Chemical information and ensuring that non-Monument Chemical proprietary information is used and disclosed only as authorized by the owner of the information or as otherwise permitted by law.
- I will observe fair dealing in all of my transactions and interactions.
- I will protect all company, customer and supplier assets and use them only for appropriate company-approved activities
- Without exception I will comply with all applicable laws, rules and regulations.
- I will promptly report any illegal or unethical conduct to management or other appropriate authorities (i.e. Ethics Law, EEO)

Every employee has the responsibility to ask questions, seek guidance and report suspected violations of this Code of Business Conduct and Ethics. Retaliation will not be tolerated against employees who raise genuine concerns.

I have read Monument Chemical Code of Business Conduct and Ethics and I certify that:

- I understand The Monument Chemical Code of Business Conduct and Ethics.
- To the best of my knowledge, I am in compliance with Monument Chemical Code of Business Conduct and Ethics.
- I will continue to comply with Monument Chemical Code of Business Conduct and Ethics.

Printed Name

Employee ID #

Signature

Date