

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.