

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

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,