# CODE OF CONDUCT

## OUR CORE VALUES IN ACTION

ALBEMARLE®

# OUR CORE VALUES IN ACTION

## Message from Albemarle's Chairman, President & CEO Luke Kissam

Our potential is powered by our passion to innovate, dedication to serve our customers and willingness to collaborate with each other. It's also driven by the trust we have built with our customers, neighbors, communities, suppliers and investors. These qualities have contributed to a reputation that has taken years to build.

To protect and further enhance this reputation, our work must be guided by our Core Values of Care, Collaboration, Courage, Curiosity, Humility, Integrity and Transparency. A new project might present obvious commercial benefits and be in line with local and international laws. But when we apply all of our Core Values, is there a better option? Regularly asking this question in team meetings and of our business partners is critical to our continued success.

Our Code of Conduct teaches us how to put our Values in action. Throughout this Code, you'll see principles guided by our Core Values and organized by activity, so that it's easy to see how they apply in your day-to-day work. We have also developed an interactive eCode for employees that provides more detailed requirements and guidance in any given work situation.

Each of us has an internal compass guiding our ability to know right from wrong. We learned it as youngsters on the playground and in the sandbox. It's the voice inside our head shouting "Don't do it" or "Do it — it's the right thing." Never compromise our Core Values in exchange for any short-term gain. Remember, the way we work is as important as the products we sell; the "how" is just as important as the "what."

Our work can be complex, and sometimes the right path forward may not be clear. You are not alone. If you are ever unsure what to do, put our Value of Humility in action by asking questions. It's also important to speak up when you see activity that is contrary to our Core Values or applicable laws. In this Code we offer multiple ways for you to get help or report anything you think is wrong. Your Courage in speaking up will help the Company address the issue and do the right thing.

When we put our Values in action and commit to this Code, together we'll build a stronger future for us and all of our stakeholders.

Be safe.

Luke

# OUR CORE VALUES

## CARE

We value safety and the well-being of each other. We help make our communities better. We are stewards of the environment.

## CURIOSITY

We encourage questions and wonder. We seek continuous learning, improvement and innovation.

## COURAGE

We are comfortable being vulnerable. We are willing to take informed and shared risks, but not shortcuts.

## COLLABORATION

We believe two are better than one when two act as one. We are empowered to perform our jobs and are accountable for the result.

## HUMILITY

We share the credit and value the ideas of others – it's not about me. We value diversity of thoughts, experiences and cultures.

## INTEGRITY AND TRANSPARENCY

We are our word. We do what we say. We communicate and act transparently. What you see is what you get.

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# START WITH THE CODE

Our Code is a public statement of who we are and the standards we expect in our daily work. The Code is organized by work activity, rather than area of law. You should see the Code as a starting point, especially when you are undertaking activity that is unfamiliar to you. You are responsible for knowing those Code requirements that apply to your job. If you know or suspect that local law sets different standards from our Code, we expect you to follow the higher standard.

## TO WHOM DOES THE CODE APPLY?

The Code applies to Albemarle Corporation, all Albemarle-controlled entities and their respective employees, officers and directors.

We also expect suppliers, contractors, agents, distributors and any others acting on our behalf to be familiar with our Code, and to comply with Albemarle's Code of Conduct for Business Partners and applicable policies.

We seek to influence our non-controlled joint ventures, and our partners in those joint ventures, to ensure that the joint venture adopts requirements similar to those in this Code and our policies.

## MAKING THE RIGHT DECISION

The Code cannot address every situation you may face in your day-to-day activities. When you are unsure about the right thing to do, ask yourself the following questions before taking action:

### eCode

The Code is supplemented by our interactive eCode, which is accessible to Albemarle employees on your computers and smartphones. The eCode sets out specific requirements for each type of work activity, with links to supporting policies and details of whom to speak to if you have questions. All employees are expected to familiarize themselves with the eCode. Employees can access the eCode at ecode.albemarle.com.



- Is my health and safety or the health and safety of others at risk?
- Am I acting consistently with our Core Values, this Code, our policies and applicable law?
- Am I authorized to do this activity?
- Do I feel comfortable doing this activity?
- What would my work colleagues, friends or family think if they knew what I was intending to do?
- Would I feel comfortable with my actions being reported on the front page of a newspaper?
- Will the activity attract adverse commentary on social media?

Sometimes our work doesn't go according to plan. For example, a permit application is delayed or rejected, or a production or sales target is missed. In those situations, when you think you're under pressure, it is even more important to stop and reflect on these questions. Taking risks or cutting corners is not the answer. It is important that we make the right decision in every situation.

If you are ever unsure about how to handle a particular situation, stop and seek help. You are not alone!

## ASKING QUESTIONS

The eCode provides access to additional guidance, frequently asked questions, policies and procedures for each section. In addition, you can always get help from:

- Your Supervisor
- Your HR Representative
- Global Ethics & Compliance
- The Legal Department
- The Integrity Helpline

## ACCOUNTABILITY FOR OUR ACTIONS

To uphold our Core Values it is important that we are all held accountable for our actions. How you work is an essential part of your performance at Albemarle. This includes not only how you apply our Core Values and this Code in your daily work, but also how you support others who are responsible for conducting monitoring, audits or investigations.

Any violation of the Code, Company policies or applicable laws may result in disciplinary action up to and including termination of employment. The Company may also voluntarily report potentially illegal behavior to law enforcement.

## KEEPING CODE FIT

Living our Core Values requires courage to do the right thing, especially in the most challenging circumstances. That courage is formed more easily when we build good habits into our daily routines.

- Take training that is offered to you
- Obtain approvals required by Code and policies
- Act within your levels of authorization
- Make sure contracts you negotiate with customers, vendors and other business partners are signed by all parties
- Submit invoices and business expense claims on time, and with complete supporting documentation
- Classify and manage documents that you create or receive
- Re-read emails and documents before you send them to make sure they clearly convey your intended message
- Ask questions if you're unsure about what to do
- Speak up if something doesn't feel right

# SPEAKING UP

## RAISING CODE OF CONDUCT CONCERNS

### CODE PRINCIPLES

Speaking up about potential concerns helps Albemarle to improve understanding, prevent harm, manage risk and promptly address concerns.

- We demonstrate humility by asking questions when we are unsure and acknowledging when we get things wrong.
- We show care and courage by speaking up when we see something that concerns us, however minor.
- We raise ethics or compliance concerns in good faith.
- Investigations are conducted objectively, promptly, discretely and thoroughly.
- We respect the privacy and secure the personal data of those who are affected by an investigation.
- We preserve the anonymity of those who report concerns, if they have so chosen and where possible.
- We cooperate with any internal or government investigation and answer questions honestly.
- We prohibit any direct or indirect acts of retaliation against someone who reports a potential violation of this Code or applicable laws.



## KNOWING WHEN TO SPEAK UP

## WHERE TO GO FOR HELP

You are encouraged to speak with your supervisor or local site leader first. If you feel uncomfortable speaking with your supervisor or local site leader or that your concern is not being properly addressed, you can always speak to:

- Your HR Representative
- The Regional Compliance Manager
- A member of the Legal Department

Still have concerns? You can also contact:

- The Chief Compliance Officer
- Global Ethics & Compliance via integrity@albemarle.com
- The General Counsel
- The Chair of the Audit and Finance Committee of the Albemarle Board of Directors

## INVESTIGATING A CONCERN

Investigations are taken very seriously at Albemarle. All investigations are conducted in accordance with our Investigations Policy and Investigations Procedure, which are reviewed periodically with the Audit & Finance Committee of the Albemarle Board of Directors. Any violation of the Code, Company policies or applicable laws may result in disciplinary action up to and including termination of employment.

Nothing in this Code, the Investigation Policy, Investigation Procedure or supporting processes prevents you from communicating with government agencies about possible violations of law or seeking legal advice as to your rights.

## NON-RETALIATION POLICY

We will not tolerate any direct or indirect acts of retaliation against an individual who in good faith reports a concern or suspected violation of this Code or applicable laws. This includes retaliation against anyone for participating in an investigation of suspected misconduct, whether conducted by Albemarle or any government agency. We will investigate all allegations of retaliation. Individuals who have engaged in retaliation will be disciplined, up to and including termination of employment.

## SUPERVISORS: RESPONDING TO SOMEONE WHO SPEAKS UP

Supervisors have a special responsibility to listen and act. Handling concerns appropriately is critical to demonstrating care, preserving trust and protecting Albemarle. If someone raises a concern, you should do the following:

- ☑ Thank the person for having the courage to speak up
- ☑ Remove distractions and listen carefully
- ☑ Take notes, free of subjective opinion
- ☑ Respond respectfully and take every concern seriously, even if you disagree
- ☑ Assure the employee that you – or someone else – will follow up with them in relation to the matter
- ☑ Contact HR, Global Ethics & Compliance or the Legal Department – do not attempt to conduct the investigation yourself



# THE INTEGRITY HELPLINE

**24 HOURS A DAY, 7 DAYS A WEEK**
**www.IntegrityHelpline.Albemarle.com**

The Integrity Helpline is operated by an independent company, and can be contacted 24 hours a day, 7 days a week, in multiple languages by various means - phone, online or text message (in the US).

The Helpline is operated in a manner consistent with the laws of the countries where we operate. To ensure that a focused and timely investigation can be undertaken, to facilitate communication and to establish your protection as someone who has reported concerns, you are encouraged to give your name, contact information and as much detail as you feel comfortable providing. A report may be made anonymously should you prefer.

Due to local privacy laws in certain countries and the European Union, the Integrity Helpline may permit only specific types of reports, such as accounting, financial, auditing and bribery matters. In those countries, please contact your HR Representative, the Legal Department or Global Ethics & Compliance to report other issues.

If calling inside the U.S., call 800-461-9330.

If you are dialing internationally, find the number below or visit IntegrityHelpline.Albemarle.com and choose your location to receive the number assigned to your country.

| | | | | | | |
|---|---|---|---|---|---|---|
| **Australia**<br>1-800-763-983 | **Belgium**<br>0800-260-39 | **Chile**<br>1230-020-3559 | **China, PRC**<br>00-400-120-3062 | **France**<br>0805-080339 | **Germany**<br>0800-181-2396 | **Hungary**<br>36-212111440 |
| **Japan**<br>0800-170-5621 | **Korea**<br>070-4732-5023 | **Netherlands**<br>0-800-022-0441 | **Russia**<br>8-800-100-9615 | **Singapore**<br>800-852-3912 | **Taiwan**<br>00801-14-7064 | **United Arab Emirates**<br>8000-3570-3169 |

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# WORKING
## WITH EACH OTHER

**We believe in powering the potential of diverse, innovative and inclusive teams that create value for individuals and the Albemarle community.**

- We care for the health, safety and well-being of each other.
- We create a work environment that fosters mutual respect.
- We proactively collaborate with each other, encourage others to contribute and appreciate constructive feedback.
- We treat our colleagues, customers, suppliers and other stakeholders with care, courtesy, fairness and respect, in moments of agreement as well as disagreement.
- We consider the impact of our actions on others.
- We strive to build a diverse and inclusive culture that embraces learning and fosters trust.
- We do not discriminate based on race, color, ancestry, national origin, citizenship, age, physical or mental disability, medical condition (including pregnancy), religion, political affiliation, marital status, gender, sexual orientation, gender identity, genetic information, veteran status or any other status or characteristic protected by applicable law.
- We do not engage in harassment, humiliation, bullying, retaliation or other forms of intimidation.
- We do not make unwelcome or inappropriate advances, including sexual harassment.
- We do not display or share offensive, threatening or demeaning materials.
- We do not bring weapons into our workplace.
- We show care and courage by speaking up if we see others being harassed, bullied, intimidated or otherwise made to feel uncomfortable. We do not assume that others have already raised concerns.
- We do not participate in or pressure others to participate in inappropriate forms of hospitality or entertainment.
- We respect the privacy and personal data of each other.
- We do not knowingly make false allegations in relation to someone else's conduct.
- We do not retaliate against those who have reported a Code concern.

# MANAGING YOUR TEAM

**Albemarle leaders take personal accountability for the performance of their teams. Our leaders are responsible for fostering a positive, team-oriented environment that allows each employee to achieve their full potential.**

- We lead by example, demonstrating behaviors that are consistent with our Core Values.
- We support and encourage the health, safety and well-being of our team.
- We comply with all applicable labor, immigration, equal opportunity, data privacy laws, regulations and rules.
- We believe in the freedom of our employees to join a trade union, and we comply with all works council agreements.

- We frequently discuss and hold our teams accountable to our Core Values and this Code.
- We are responsible for creating an environment that is open and inclusive, and we value diversity of thought, experiences and cultures.
- We ensure our team members have the knowledge, skills and resources to perform their work safely, correctly and in accordance with the Core Values and this Code.
- We set clear, challenging but realistic goals that do not encourage employees to act in violation of our Core Values or this Code.
- We treat our team members fairly and with respect. We do not harass, humiliate, bully or otherwise intimidate members of our team.
- We promote our employees based on an individual's skills, qualifications, performance and other factors related to a job's specific needs.
- We make decisions on employee pay, promotion, discipline and termination in a fair, equitable and transparent manner.
- We demonstrate humility by listening to team members who raise a concern and know what to do when concerns are raised.
- We do not permit or ignore inappropriate conduct. We speak up and take appropriate action.
- We do not tolerate retaliation against those who have the courage to speak up.

# HIRING NEW MEMBERS OF YOUR TEAM

**We believe that our people make us successful. We embrace diversity of experience, talent and thought.**

- We are an equal opportunity employer; our employment decisions are based on an individual's skills, qualifications, performance and other factors related to a job's specific needs.
- We empower our new employees to realize their full potential through clearly defined roles, expectations, management support and levels of authority.
- We provide reasonable accommodations to those employees with disabilities to help them perform their job as required by applicable law.
- We do not tolerate any form of discrimination in relation to the hiring of employees.
- We strive to ensure prospective employees will embrace our Core Values and this Code.
- We report a potential conflict of interest if family members or friends apply for a role in our team.
- We do not offer employment as a means to improperly influence a government official to gain business or an improper advantage.
- We prohibit the use of child and forced labor, human trafficking or any other action that may adversely affect the labor or human rights of workers.
- We do not collude with competitors in relation to the hiring of or compensation paid to employees.

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## WORKING SAFELY & LOOKING AFTER

# YOUR HEALTH

**We care for the health and well-being of employees, contractors, visitors and our host communities above everything else. We are committed to ensuring that everyone goes home safe and healthy every day.**

- We operate our sites in accordance with all applicable health and safety laws, in addition to our own policies and requirements.
- We expect our contractors, suppliers and visitors to our sites to follow applicable health and safety requirements.
- We take personal responsibility for our own health, safety and well-being. We lead by example.
- We look out for the safety of others, and intervene where necessary to keep them safe.
- We demonstrate a visible commitment to safety by engaging and empowering employees through the allocation of leadership time, attention and resources.
- We take personal responsibility for working safely by completing required training and taking proactive steps to identify and prevent workplace-related injuries and illnesses.

- We only perform work that we are authorized, qualified and trained to perform.
- We do not commence or continue a task if the work cannot be performed safely.
- We deal with safety issues honestly and openly and encourage people to speak up.
- We listen to others who raise safety concerns and do not retaliate against anyone for speaking up.
- We promptly investigate and share lessons learned from health and safety incidents to increase hazard awareness and minimize risk of recurrence.
- We only commence work if we are adequately fit, sufficiently rested and free from the influence of alcohol, illegal drugs, exhaustion or medication that impairs our ability to work.
- The Company reserves the right, where legally allowed, to conduct random and for-cause inspections and drug/alcohol testing.
- Tobacco use is permitted only at Albemarle sites which have designated smoking areas.
- We deal with physical and emotional health issues honestly and openly, and encourage employees to speak up and raise concerns.
- We take steps to protect the privacy of health-related data that we maintain on employees.

# PROTECTING
## THE ENVIRONMENT

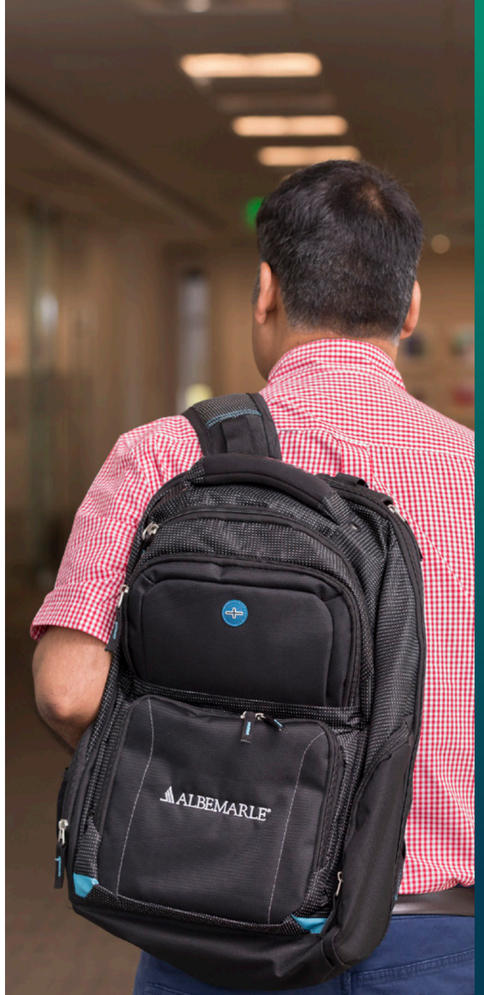
**We minimize the environmental footprint of our operations through careful management of raw materials, supplies, natural resources, utilities and waste.**

- We comply with all applicable environmental laws, regulations, operating permits and our own environmental policies.
- We immediately report any leak, spill, release or other environmental incident or near miss.
- We comply with environmental reporting requirements with transparency and accuracy and engage environmental regulators with integrity.
- We provide clear instructions and warnings on the appropriate handling, transportation, use and disposal of our products.
- We seek to ensure our business partners follow appropriate environmental standards and practices.
- We promptly investigate and share lessons learned from environmental incidents to increase awareness and minimize risk of recurrence.

# TRAVELING ON BUSINESS

**When we travel on behalf of Albemarle, we do so safely and responsibly.**

- We take every precaution to ensure our safety, security and well-being during business travel.
- We comply with applicable immigration laws and obtain visas where required.
- We are mindful of local culture, customs and laws when we travel.
- We ensure that we are sufficiently rested after travel to perform work at a host site safely and effectively.
- We use authorized agents to make travel bookings so that the safety and security of our employees can be monitored.
- We are cost-conscious in our travel-related decisions, and only incur reasonable travel expenses.



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# ENGAGING
## WITH OUR CUSTOMERS & THIRD-PARTY SALES REPRESENTATIVES

**Working collaboratively with our customers we seek to find value-added solutions that provide our customers a competitive advantage in the marketplace. We engage with customers with honesty, humility, integrity, transparency and respect and expect our third-party sales representatives to act in a similar manner.**

- With curiosity, we seek to understand our customers' requirements and collaborate to customize our products and services.
- We promise only what we can deliver, and deliver what we promise.
- We strive to provide customers complete and accurate information concerning the performance, handling requirements and health risks of our products.
- We address the concerns of our customers promptly and with humility.
- We respect the privacy of our customers and take steps to protect personal information of their employees.
- We seek to sell our products to customers directly, unless there is a demonstrated, critical business need or a legal requirement to use the services of a third-party sales representative.

- We prohibit all forms of bribery and corruption, whether by our employees, third-party sales representatives or anyone else acting on our behalf.
- We do not offer or provide anything of value directly or indirectly with the intent to improperly influence or reward any customer (including any employees of state-owned enterprises) in order to gain business or an improper advantage.
- We do not request or accept anything of value that would improperly influence ourselves.
- We ensure that we are conducting business with reputable customers, for legitimate business purposes, with legitimate funds.
- We carefully select our third-party sales representatives, and appropriately monitor and audit their conduct.
- We require our third-party sales representatives to certify compliance with applicable ethics and compliance laws, and the Albemarle Code of Conduct for Business Partners.
- We do not ask, expect or allow third-party sales representatives to carry out acts that would be a violation of this Code or applicable laws.
- We speak up if we are concerned that a customer or third-party sales representative is not acting in accordance with our Core Values, this Code or applicable laws.
- We do not sell or ship to individuals, companies or countries if we know or suspect that such activity will violate anti-boycott, export controls or sanctions laws or regulations.

## GATHERING COMPETITIVE

# INTELLIGENCE

**Gathering competitive intelligence enables us to better understand and anticipate the competitive environment in which Albemarle operates. However, the gathering of such information must be undertaken with care to ensure compliance with contract confidentiality obligations and applicable anti-corruption, competition, trade compliance and state secrets laws.**

- We obtain competitive intelligence in an appropriate and lawful manner.
- We ask questions and seek guidance if we are unsure if we should ask for, keep or use competitive intelligence.
- We accurately document the source of our competitive intelligence.
- We do not obtain competitive intelligence by deception, misrepresentations, "half-truths," theft or other improper means.
- We do not gather or accept competitive intelligence from a competitor.
- We do not ask a third party to disclose information, or accept such information, if we have reason to believe they are not authorized or contractually permitted to provide it.
- We do not offer or provide gifts, hospitality or anything else of value in exchange for the inappropriate disclosure of competitive intelligence.
- We do not ask or permit a third-party acting on our behalf to gather competitive intelligence in an inappropriate manner.

# CONTACT WITH COMPETITORS

**We believe in the principle of free trade. We are committed to vigorous but fair competition and act independently of our competitors. We expect our customers and vendors to also compete fairly and will take action against those who do not.**

- We compete on price, quality, volume, service, talent, research and innovation.
- We do not agree with competitors to fix, raise, lower or stabilize prices of goods that we sell.
- We do not fix other competitive terms such as pricing formula, surcharges, discounts, margins, rebates, commissions or credit terms with competitors.
- We do not disclose, request or otherwise exchange competitively sensitive information with competitors in an inappropriate manner.
- We do not agree with competitors to limit production or production capacity.
- We do not rig bids or otherwise illegally coordinate bidding or tendering activities with competitors.
- We do not allocate markets, customers, suppliers or geographic territories with competitors.
- We do not agree with a third-party to boycott a particular supplier or customer even on apparently legitimate grounds (credit performance, safety).
- We do not enter into a no-poach agreement with competing hirers of talent or discuss compensation levels for potential or existing employees.
- We do not agree with competitors to limit the quality or features of our products, research or innovation.
- We avoid casual contact or communication with competitors that could give the impression of collusion or the inappropriate exchange of information between Albemarle and competitors.
- We do not use third parties (including consultants, third-party sales representatives or industry associations) to assist in or facilitate improper contacts or activities with competitors.

# SELECTING
## & MANAGING OUR VENDORS

**The effective procurement of goods, services and raw materials is critical to the development and expansion of our sites, and the manufacture and supply of our products to customers. We select vendors based on objective criteria and their alignment with our Core Values.**

- We seek to ensure that prospective and existing vendors comply with applicable laws; supply with integrity; minimize their adverse impact on the environment and local communities; provide a safe and healthy workplace; and respect basic human rights of employees and laws relating to conflict minerals.
- We conduct tender processes with transparency, treat vendor bids as confidential and do not provide any current or prospective vendor with an unfair or improper advantage.
- We monitor prospective and existing vendors to ensure they are not engaging in collusion or inappropriately exchanging competitively sensitive information relating to Albemarle.
- We seek to avoid actual or potential conflict of interest arising from the selection or use of a vendor.
- We treat our vendors with respect, communicate our requirements with clarity and transparency, and pay valid invoices on time.
- We expect our contractors and vendors to comply with our health and safety requirements.
- We prohibit our vendors from engaging in bribery, including facilitation payments, on Albemarle's behalf.
- We only pay for goods and services provided and monitor our vendors for evidence of fraud or bribery.
- We do not use vendors if we suspect that such activity will violate export or sanctions laws or regulations.
- We do not ask, expect or allow a vendor to carry out acts that would be a violation of this Code or applicable laws.
- We avoid business relationships with vendors that may be engaged in money laundering.

# MOVING GOODS,
## RAW MATERIALS, EQUIPMENT AND TECHNOLOGY

**To protect national security and foreign policy goals, the countries in which we operate regulate the transportation of goods, raw materials, equipment and technology across borders. Customs duties are also applied on the importation of such items.**

- We comply with all applicable import/export controls, sanctions and customs laws and regulations.
- We ensure that classifications, valuations, licenses, labeling and supporting documentation are accurate, complete and appropriately maintained.
- We only transport goods, raw materials, equipment and technology when authorized to do so.
- We do not ship from or to individuals, companies or countries if we know or suspect that such activity will violate import, export or sanctions laws or regulations.
- We prohibit our customs brokers, freight forwarders and other logistics providers from engaging in bribery, including facilitation payments, on Albemarle's behalf.

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# MANAGING
## A CONFLICT OF INTEREST

**We respect the privacy of our employees and their right to pursue outside activities and interests. A conflict of interest can arise, however, when employees have a personal interest in a transaction or situation that could affect their business judgment, loyalty to Albemarle or work performance. When potential conflicts of interest arise, we take appropriate steps to manage the risks arising from them.**

- We make business decisions in the best interests of Albemarle, without bias or favoritism.
- We avoid situations where personal activities, interests or relationships could affect, or be perceived to affect our decision-making or work performance.
- We do not engage in outside interests that compete with Albemarle.
- We proactively disclose any potential conflict of interest, even if we think it will have no influence on our judgment or performance.



# OFFERING OR ACCEPTING
# GIFTS & HOSPITALITY

**Giving or receiving reasonable gifts, meals or entertainment can sometimes be a part of maintaining and developing business relationships. Bribery and corruption risk can arise, however, when anything of value is provided to or accepted from a third-party.**

- We only offer, provide or accept gifts, hospitality or anything else of value when there is a genuine business purpose, it is in the ordinary course of business and of a reasonable value.
- We prohibit bribery of anyone, including those who can provide an improper advantage, including government officials, persons working in the private sector, trade union leaders and Company employees.
- We also prohibit improperly influencing an individual indirectly by offering or providing anything of value to:
  - their spouses, partners or relatives
  - their close friends, associates or business partners
  - a company in which the individual has a direct or indirect ownership interest
  - an organization with which the individual is associated (e.g. a charity).
- We do not solicit gifts, hospitality or anything else of value in exchange for a decision favoring the provider.
- We do not accept gifts, hospitality or anything else of value if it could affect, or be perceived to affect, our business judgment.
- We adequately identify any gift or hospitality that we provide, along with the identity of the recipient in our business expense claims, and provide appropriate supporting documentation.

# TRADING IN THE SECURITIES OF

## ALBEMARLE OR OUR BUSINESS PARTNERS

**Employees may be entrusted with material non-public information relating to Albemarle or its business partners in the performance of their jobs. This trust must never be violated by using the information for financial or personal benefit.**

- We do not trade in the securities of Albemarle or another company when in possession of material non-public information relating to such company.
- We do not advise, encourage, "tip off" or otherwise cause others to trade in the securities of Albemarle or another company when in possession of material non-public information.
- We do not share or disclose material non-public information of Albemarle or another company unless authorized to so.
- We take steps to prevent inappropriate access to material non-public information and take appropriate precautions when publicly disclosing Albemarle business information.
- We promptly report the inadvertent disclosure of material non-public information to an unauthorized person.
- We do not spread false or misleading information to manipulate the price or trading of securities of Albemarle or another company.



# ENGAGING IN PERSONAL POLITICAL ACTIVITY

**We respect the right of our employees to participate in the political process, through personal contributions or by volunteering their personal time to candidates or organizations of their choice. Such participation is entirely a matter of personal choice and is encouraged, provided it does not affect an employee's work or involve the use of Company assets and resources.**

- We do not engage in personal political activity on the Company's time or involve the use of any Company assets or resources.
- We do not reimburse an employee for his or her personal political contributions.
- We make it clear we are not representing Albemarle when engaging in personal political activity.

# COMPANY
## ASSETS & RESOURCES

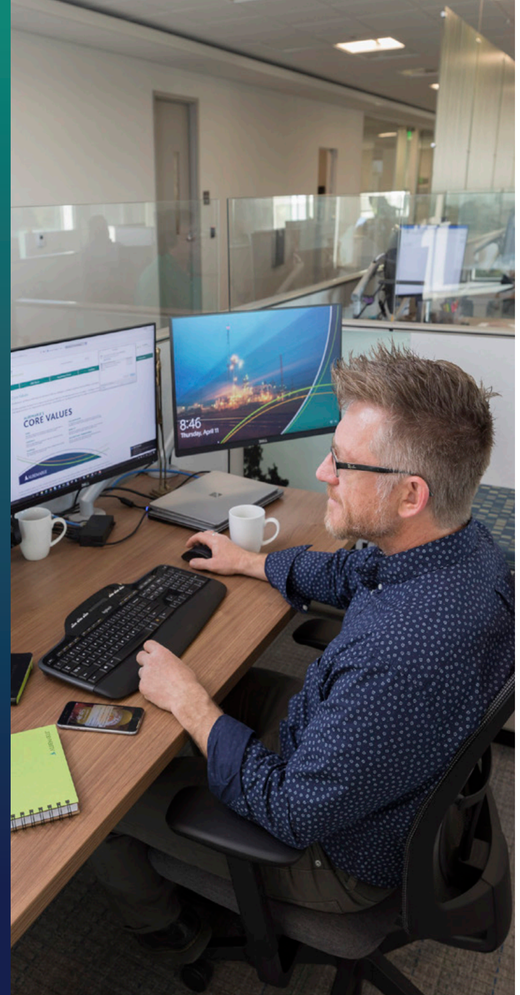
Using Company Assets & Resources 47

Using Company IT & Communication Systems 48

# USING COMPANY
## ASSETS & RESOURCES

**Our business performance is dependent on the appropriate use, protection and care of the Company's assets and resources.**

- We use Company assets and resources carefully, efficiently and for their intended business purpose.
- We spend Albemarle's funds with diligence, the appropriate authorization and within budget.
- We do not use or dispose of Company assets or resources for personal gain.
- We limit our personal use of Company assets and resources and ensure such use does not interfere with our work.
- We do not permit unauthorized access to Albemarle sites or systems.
- We take appropriate precautions to prevent damage, misuse or theft of Company assets and resources.
- We respond appropriately and safely to any perceived risks or threats to Company assets and resources.

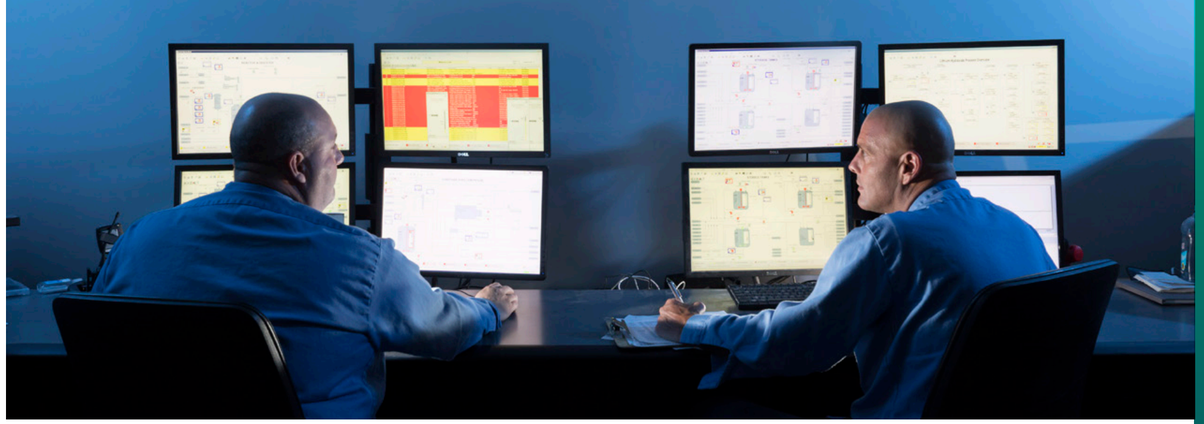



# USING COMPANY IT & COMMUNICATION SYSTEMS

**Albemarle's computer hardware, software and phones must be used appropriately to prevent unauthorized access to our IT and communications systems or inappropriate disclosure of Albemarle information.**

- We use the Company's computers, software and devices responsibly and securely, and in accordance with applicable policies and laws.
- We do not share network passwords with anyone, including supervisors, IT or third parties.
- We limit personal use of Company computers, software and devices, and ensure such use does not affect our IT systems or interfere with our work.
- We do not use personal email accounts or social media applications for proprietary or sensitive work-related communication.
- We do not download or install new software on Company computers or devices without authorization and an appropriate license.





- We do not disable virus software or attempt to remove viruses ourselves.
- We do not modify, duplicate or sell software on Company computers or devices without authorization.
- We do not attach unauthorized devices to Company computers, devices or networks.
- We do not use Company computers or devices to access or share inappropriate, offensive or illegal material.
- We respect the privacy of our colleagues, and do not access, intercept or disclose the communications of others without authorization.
- We do not disclose information about Albemarle's information system controls to any other employee or third-party who is unauthorized to receive it.
- We immediately report known, suspected or imminent access to our IT and communications systems that is unauthorized.

Albemarle's computer hardware, software, phones, tablets and the data stored on them, and business-related data stored on employee's own phones, are Company assets and resources. To protect the Company, and our employees, we monitor the use of our IT and communications systems and may access, preserve, review and delete business-related data in accordance with applicable policies and laws. Employees consent to permit all information they store or transmit on Albemarle's information systems to be monitored and accessed by authorized Albemarle personnel, and disclosed to law enforcement authorities.

# MANAGEMENT
## OF INFORMATION & KNOWHOW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Creating, Managing & Disclosing Albemarle Business Information 55

Managing Personal Data 56

## CREATING, PROTECTING & ENFORCING OUR

# INTELLECTUAL PROPERTY

**All intellectual property created during the course of work for Albemarle, or otherwise based on Albemarle's information, belongs to Albemarle. Such intellectual property is a Company asset and must be used, protected and disclosed appropriately. We must similarly respect the intellectual property of others.**

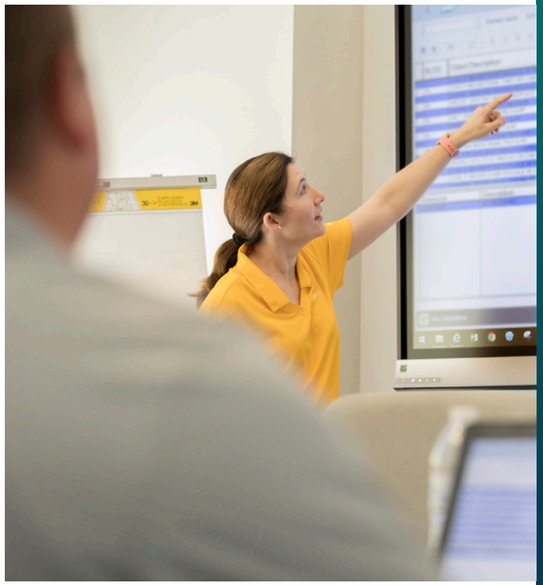
- We collaborate with transparency to develop intellectual property for the Company and take appropriate steps to protect it.
- We monitor for the unauthorized use of our intellectual property by others.
- We respect the intellectual property of others, and only use it when authorized to do so and in accordance with such authorization.
- We only disclose non-public Albemarle intellectual property to third parties, or to other Albemarle employees, if authorized to do so.
- We use Albemarle's intellectual property only for the benefit of Albemarle.
- We use Albemarle's trademark or brand only as authorized.

## CREATING, MANAGING & DISCLOSING

# ALBEMARLE BUSINESS INFORMATION

**The business information we create or receive is valuable and must be managed and protected much like any other Albemarle asset.**

- We create business information that is clear, accurate, complete and in accordance with applicable policies, laws, accounting rules and practices.
- We ensure that business information accurately reflects the underlying transaction or event.
- We correctly classify the type and sensitivity of our information to ensure appropriate information security protection is applied.
- We do not falsify, alter, destroy or tamper with business information to misrepresent or conceal a transaction or event.
- We treat Albemarle's business information with care and take appropriate steps to protect it from unauthorized access or disclosure.
- We do not disclose Albemarle business information to other employees, contractors or third parties unless authorized to do so.
- We do not use Albemarle's business information for personal benefit.



# MANAGING
## PERSONAL DATA

**We treat the privacy and personal data of all individuals with respect and take appropriate steps to protect it.**

- We comply with all applicable data privacy laws.
- We collect, process, store, use, retain, transfer and delete personal data:
  - only when there is a legitimate business or legal need
  - when we are appropriately authorized
  - accurately, adequately, fairly and in a transparent manner
- We treat personal data with care and take steps to ensure that it is secure and protected.
- We only retain personal data for as long as it is necessary, and for the purpose for which the data was collected.
- We only share personal data with others when there is a legitimate business or legal need to do so, they are authorized to receive it, and we take steps to ensure they understand the importance of protecting that data.

- We prohibit the use of personal data of others for personal purposes, for the commercial benefit of anyone other than Albemarle or in any other inappropriate way.
- We take appropriate steps to ensure that the transfer of personal data, especially between countries, is legal and secure.
- We take measures to ensure that third parties who collect, process or use personal data on our behalf do so in accordance with applicable laws and Albemarle's Code of Conduct for Business Partners.
- We respond promptly and appropriately to requests from our employees and others to review, update, correct or delete their personal data.
- We report any suspected theft, accidental loss or unauthorized access, destruction or alteration of personal data as required by law.

# FINANCE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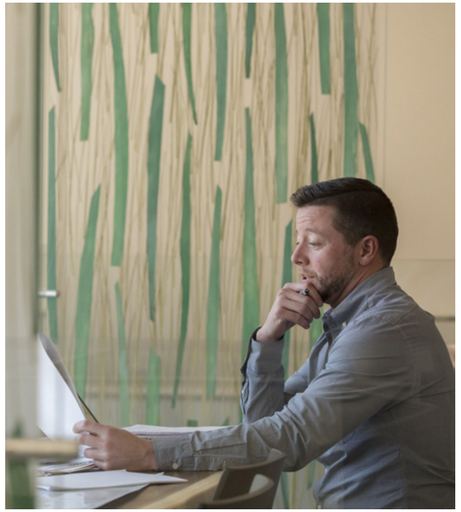
Recording Business & Financial Transactions 63

# MANAGING
## BUSINESS EXPENSES

**Working for Albemarle often requires travel and other activities that involve incurring business expenses. Such expenses must be incurred for legitimate business purposes only and accurately recorded.**

- We use corporate credit cards or Company purchasing cards only for permitted types of business expenses.
- We submit our expense claims honestly, accurately and on time.
- Our expense claims include reasonable detail and complete supporting documentation.
- We carefully review the expense claims of our team, and only approve those within our financial approval authority.
- We do not authorize our own expenses or the expenses of a more senior employee.
- We do not submit false, incomplete or misleading expense claims.



# RECORDING

## BUSINESS & FINANCIAL TRANSACTIONS

**We make good decisions and maintain the trust of our investors if the Albemarle financial information provided to them is accurate and complete. Albemarle maintains internal controls to ensure that our books and records fully and objectively reflect our business and financial transactions and their underlying business purpose in a materially accurate manner.**

- We only execute transactions in accordance with this Code, applicable policies and laws. It is our personal responsibility to know those requirements.
- We only approve transactions within the scope of our delegated authority.
- We validate transactions and the source, destination and transmission of funds through appropriate supporting documentation.
- We do not intentionally create false, incomplete or misleading entries in our books or records.
- We do not use Albemarle funds or assets in violation of our Code or applicable law.
- We do not establish or maintain undisclosed or unrecorded Company funds or assets.
- We record all intercompany transactions at arm's length, and in accordance with the OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations.
- We are honest, transparent and timely in our engagement with auditors and tax authorities.
- We immediately report concerns with the accuracy of our books and records, the integrity of our internal controls or any suspected fraud.
- We collect and understand documentation about prospective business partners to ensure that they are involved in legitimate business activities and that their funds come from legitimate sources.

# REPRESENTING ALBEMARLE

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Participating in an Industry Association, Exhibition or Conference 75

# ENGAGING WITH GOVERNMENT OFFICIALS

**Government and regulatory decision-making directly affect our legal and social license to operate in every country in which Albemarle conducts business. We will proactively engage with governments on issues of concern to Albemarle, its businesses or its stakeholders (employees, investors, communities) to inform their decisions.**

- We are courteous, truthful, cooperative and constructive when engaging with government officials.
- We apply or compete for government permits, licenses and business with humility, integrity, transparency and free of any conflict of interest.
- We prohibit all forms of bribery of government officials or activity which could give the impression of bribery, whether by our employees, contractors or third parties acting on our behalf. This includes the making of facilitation payments.
- We do not offer or provide anything of value directly or indirectly with the intent to improperly influence any government official in order to gain business or an improper advantage.
- We ensure that information we provide to government officials is accurate, timely and in accordance with applicable laws.
- We cooperate with any government request or investigation and answer questions honestly.
- We do not obstruct legitimate government investigations by intentionally withholding, concealing or destroying relevant documents.
- We do not retaliate or discriminate against anyone who reports wrongdoing or lawfully cooperates with a government inquiry or investigation.

# MAKING POLITICAL CONTRIBUTIONS ON BEHALF OF ALBEMARLE

**At Albemarle, we only make political contributions to advance and protect the legitimate interests of our Company, not those of any one individual. These political contributions are only made if they are authorized and permitted under Company policy, applicable laws and regulations.**

- We do not make political contributions with the intent of improperly influencing any person in order to gain business or an improper advantage.
- We do not provide sponsorships, charitable donations or other payments to circumvent applicable laws or Company policies relating to political contributions.
- We do not use or allow others to use Albemarle assets or resources for any personal political campaign, political party, political candidate, elected official or any of their affiliated organizations.
- We do not require or pressure employees to support any political party or politician, make personal political expenditures or take any retaliatory action against employees who decide not to contribute.



# ENGAGING WITH OUR HOST COMMUNITIES

**We engage with our host communities with care, respect, transparency, honesty and humility, and seek to make positive contributions to these communities.**

- We assess and consider the social, cultural, environmental and economic impact of our operations on others.
- We maintain the safety and security of our operations, while respecting the human rights of those in our host communities.
- We contribute to the development and quality of life of our host communities.
- We do not offer or provide anything of value with the intent to improperly influence a community representative to gain business or an improper advantage.
- We seek opportunities to procure locally where possible to support the economic and social development of our host communities.
- We value the culture, heritage and diversity of views of our host communities, and respect community sites which are culturally or religiously significant.

- We value the traditional rights of indigenous communities over their habitat.
- We respond to community complaints in a timely manner and undertake action to address their concerns when appropriate.
- We will not retaliate against any Albemarle employee or member of our host communities for making a community-related complaint.

# MAKING CHARITABLE DONATIONS

**Charitable donations are a way for Albemarle to contribute to worthy causes and are consistent with our Core Value of Care. To address fraud and corruption concerns, we seek to ensure that such funds are paid to the authorized recipient and spent in accordance with our charitable intent.**

- We make charitable donations to promote, among other causes, education, health, social and wellness, cultural and veteran initiatives.
- We make charitable donations with transparency, in accordance with applicable laws and with no expectation of anything in return.
- We do not offer or provide charitable donations directly or indirectly with the intent to improperly influence any person (including a government official) in order to gain business or an improper advantage.
- We do not make charitable donations to inappropriately benefit ourselves or our spouse, partner, relatives, friends or associates.
- We make no charitable donations to organizations whose goals are incompatible with our Core Values or would otherwise damage our reputation.

# SPONSORING

## AN EXTERNAL EVENT

**Sponsorships can provide a way for Albemarle to help strengthen our communities, engage with customers and partners, and raise awareness of Albemarle's role in the communities in which we operate. To address fraud and corruption concerns we must ensure that sponsorship funds are paid to the authorized recipient and used for their intended purpose.**

- We undertake commercial sponsorships for legitimate business and brand development purposes.
- We do not offer or provide or promise commercial sponsorships directly or indirectly with the intent to improperly influence any person (including a government official) in order to gain business or an improper advantage.
- We do not use commercial sponsorships to inappropriately benefit ourselves or our spouse, partner, relatives, friends or associates.

# PARTICIPATING

## IN AN INDUSTRY ASSOCIATION, EXHIBITION OR CONFERENCE

**Albemarle participates in associations, exhibitions and conferences to contribute to industry discussion with business partners, peers and other stakeholders on matters of mutual interest. To protect our reputation, and manage legal risk, we take steps to ensure that such industry collaboration is in accordance with our Core Values and supports our corporate strategy.**

- We only participate in industry associations that have been authorized and that maintain public positions that are consistent with Albemarle's own policy.
- We seek to ensure that industry associations have adopted appropriate ethics and compliance policies, procedures and controls.
- We do not use associations, exhibitions or conferences to enter into any improper agreements with competitors or improperly restrict competition or share competitively sensitive information.
- We avoid casual contact or communication with competitors at industry events that could give the impression of collusion or the inappropriate exchange of information between Albemarle and competitors.
- We closely monitor any engagement that industry associations have with government officials and other stakeholders on our behalf.
- We manage potential conflicts of interest arising from our participation in any industry association, exhibition or conference.

# EXTERNAL
## COMMUNICATIONS

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Advertising Albemarle and its Products 81

## SPEAKING ON BEHALF OF
# ALBEMARLE

**When talking about Albemarle or sharing Company information we act as brand ambassadors of the Company and our Core Values. We protect Albemarle's reputation by speaking with clarity, accuracy, integrity and transparency.**

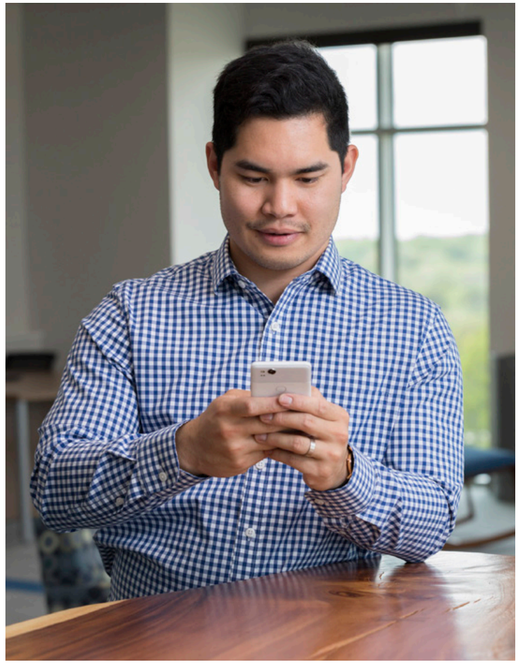
- We are strategic and thoughtful when identifying opportunities to speak on behalf of Albemarle.
- We comply with public disclosure laws and stock exchange rules, and disclose material non-public information only through authorized spokespersons.
- We do not publicly communicate in any way that is false, misleading or would damage our personal reputation or Albemarle's reputation.
- We do not use our public communications to inappropriately disclose information to or otherwise illegally coordinate with competitors.
- We do not disclose publicly proprietary or other confidential information of Albemarle or our business partners without appropriate authorization.
- We do not use the intellectual property of others in our public communications, unless authorized to do so by the owner.



# USING SOCIAL MEDIA

**Social media offers us a chance to connect and share content about Albemarle with the online community. We protect Albemarle's reputation through posting on social media with care, humility, integrity and transparency.**

- We promote productivity by refraining from using social media during work hours, except when used for business purposes.
- We do not post vulgar, obscene, threatening, intimidating, recklessly false, or harassing content, content portraying us as appearing to engage in illegal conduct, or content that disparages Albemarle's products or services or its employees, customers, vendors or competitors.
- We respect the Company's proprietary information, and the privacy of our colleagues and others when posting information, images or video on social media.
- We do not post personal data of our employees or customers on social media.
- We do not use social media applications for proprietary or sensitive work-related communication.



# ADVERTISING

## ALBEMARLE AND ITS PRODUCTS

**We have a responsibility to represent our Company fairly and accurately, to inform our customers how to correctly handle our products and to maintain our reputation through consistent use of our brand.**

- We advertise the Company and its products with accuracy and integrity.
- We comply with all applicable product regulatory laws in relation to our advertising and marketing.
- We respect the data privacy rights of people who receive advertising material and other communications from us.
- We do not negatively comment on competitors or other third parties in our advertising.

ALBEMARLE®

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