

Stay true.



CONDUCT MATTERS.

CORE VALUES



At Albemarle, we believe in doing things the right way by *staying true* to our 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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Working Together, We Stay True





Message from Albemarle's Chairman, President and CEO

I have always believed that each of us has an internal compass that guides our ability to know right from wrong. It's the voice inside our head that shouts "Don't do it" or "Do it — it's the right thing." Our Core Values and our Code of Conduct pull together these "right things to do." It is a living document that provides a roadmap to help each of us "stay true" to that internal compass to help us make good, ethical decisions in our everyday business interactions. At Albemarle, we believe in doing things the right way by "staying true" to our values. This commitment has allowed us to develop a strong, positive reputation for business conduct and corporate ethics that serves as the foundation for our success. Employees, partners, customers, suppliers and our neighbors around the globe know we can be trusted to deliver innovative products, operate safely and conduct business fairly and with integrity. Our reputation, which sets us apart from others, has become our most powerful and valuable asset.

Each of us represents Albemarle in all that we do, and maintaining our reputation as an ethical company is a responsibility we all share. Everyone at Albemarle has a responsibility to become familiar with the Code and to follow its principles every day.

I am personally committed to these values and ask for your strong commitment as well. Working together, we can "stay true" and build a stronger future. Working together, Albemarle will remain a well-respected company and a great place to work.

A handwritten signature in black ink that reads "Luke Kissam". The signature is fluid and cursive, written over a light grey rectangular background.

Luke Kissam
Chairman, President & CEO



Message from Albemarle's Chief Compliance Officer

When engaging with customers, suppliers, competitors, government officials, members of the local community or each other, we must always act with respect and integrity. It is not just about what we do, but how we do it.

By following the Code, you will “stay true” to our core value of integrity and protect our legal and social license to operate. It is also important to speak up when you see activity that is contrary to our core values or local laws. Your courage in speaking up will help the company to investigate and address the issue.

We offer multiple channels for you to report anything that you think is wrong—you can do so either confidentially or directly to your supervisor, HR, Legal or to me. I am personally committed to ensuring that all reports are investigated in an independent and timely manner.

We prohibit any form of punishment, disciplinary or retaliatory action taken against anyone for raising, or helping to raise, an ethical or compliance concern. If you believe you have been retaliated against for raising a concern you should report it immediately.

Thank you for your commitment to our Code of Conduct. Your dedication to providing value to our stakeholders, while following the highest standards in ethical and sound business practices, gives us a strong competitive edge. By living these principles every day, we'll continue to build upon the outstanding reputation that Albemarle enjoys today. By staying true to our values, we can protect what matters for the future.

A handwritten signature in black ink, appearing to read 'Andrew McBride'. The signature is stylized and fluid.

Andrew McBride
Chief Compliance Officer



Why it matters:



About the Code of Conduct



About the Code of Conduct

We are committed to doing what is right at Albemarle. Not only does it make good business sense, it is also simply the responsible thing to do. Our Code of Conduct serves as a guide to help us make the right choices. Our Code connects each of us with a common approach to conduct no matter where we live, or what we do. Our conduct has the ability to impact Albemarle's reputation, public confidence in our business and our financial strength — all of which serve as the foundation for our continued success and our future. Use this Code as a guide to “stay true” and make the right decisions as you carry out your responsibilities.



Our Responsibilities

Each of us is required to adhere to the spirit and letter of the Company's Code of Conduct, its policies and the laws that govern our business at all times.

This Code applies to all employees of Albemarle and our worldwide subsidiaries. Our employees, managers and officers, as well as members of our Board of Directors, are expected to abide by the letter and spirit of the Code. The Code also applies to all those who do business on our behalf.

What is Expected:

Read and understand our Code, Company policies and any laws and regulations that govern your business activities and comply with these standards at all times.

- Seek assistance and guidance if you are ever unsure of the right thing to do.
- Lead by example — demonstrate Albemarle's values set forth in the Code in action, every day, in every activity.
- Participate in all training and compliance program initiatives.
- Only act within the scope of your authority and remain accountable for activities that you have delegated to others.

- Speak up! Ask questions, raise concerns and report any suspected violations in a timely manner.
- Cooperate fully as part of any Company inquiry into suspected misconduct.
- Immediately report suspected instances of retaliation against anyone who has raised a concern or reported suspected misconduct.
- If you manage or lead others in the organization, you have an added responsibility to ensure that those whom you supervise meet the expectation of compliance contained in this Code.

We are all expected to comply fully with the Code at all times. Any violation of the Code, Company policies or laws that govern our activities may result in disciplinary action up to and including termination of employment. For more serious offenses, civil and criminal penalties may also apply.

Decision-Making Guidance

This Code is an overview of Albemarle's expectations and standards for ethical behavior and compliance. However, our 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:

- Will my actions conflict with the Code, Company policies or the law?
- Have I consulted the right Company resources to help me resolve the question or issue?
- If I take the intended action, how would it look on the front page of the newspaper? What would my co-workers and family think?

Duty to Report & Available Resources

Each of us has a responsibility and duty to seek assistance and guidance if unsure of the right thing to do. Similarly, each of us is required to report suspected violations and acts of wrongdoing in a timely way. Not only is this the right thing to do, it is expected behavior.

Resources Available to You:

- **Your Supervisor** – Because you report to this individual directly, he/she is in the best position to offer support and advice, and we encourage you to use this resource as your first contact whenever possible.
- **Human Resources** – Human Resources serves as an ongoing partner and support organization throughout your employment at Albemarle. Your Human Resources representatives can provide valuable advice on handling various employee matters and can help you get the information or resources you need.
- **General Counsel and Regional Lawyers** – Our lawyers in each region are familiar with Albemarle's Code of Conduct and with local laws and regulations and can assist with compliance and ethics related questions. Our General Counsel is also available to assist with answering questions regarding this Code or the applicability of the various laws to our conduct and our businesses.

- **Chief Compliance Officer** – The Chief Compliance Officer is responsible for Albemarle's Ethics and Compliance Program and for administering and interpreting this Code of Conduct. Reach out to this resource at integrity@albemarle.com anytime you have questions about proper business conduct or compliance with the law, or when you need to ask questions, raise concerns or report suspected violations.
- **Albemarle Leaders** – Other leaders throughout Albemarle can provide support, advice and recommendations on the correct approach or course of action and are available to get you to the right resource if additional guidance is needed.



The Integrity Helpline

While we encourage you to go directly to one of the resources identified above with your concerns, if for any reason you are not comfortable doing so, you may contact Albemarle's Integrity Helpline. To ensure that a focused and timely investigation can be undertaken, and to ensure your protection as a reporter, you are encouraged to provide your name and contact details. However, a report may be made anonymously should you prefer.

Reporting via Telephone

The Integrity Helpline is available 24 hours a day, 7 days a week and is managed by an independent, third-party provider, in multiple languages. You will be given a report number which you can use to follow up on your report. The Integrity Helpline is operated in a manner consistent with the laws of the countries where we operate.

See the last page of the Code of Conduct for dialing instructions to reach the Integrity Helpline.

Reporting Online

IntegrityHelpline.Albemarle.com

In addition to reporting matters by phone, you have an additional option to submit questions or concerns electronically via our albintegrity.com website. As part of the system to safeguard confidentiality, you will need to enter the report number and your previously chosen password to check the status of your report or follow up with additional details.

Supervisors' Obligations when Receiving Reports or Concerns

Supervisors who receive reports or concerns of potential Code of Conduct violations should:

- Be sure you understand the issue.
- Support the person who raises the concern.
- Never let employees feel that their concerns are being ignored.
- If uncertain about the correct course of action, seek guidance from the Chief Compliance Officer. Never investigate a suspected violation of the Code of Conduct on your own.
- Ensure that the reporter does not face retaliation.

Issue Handling & Investigations

All issues and matters reported will be taken seriously and handled in a confidential and timely way and in compliance with applicable laws, including data privacy. When appropriate, matters will be investigated and, if warranted, disciplinary action up to and including termination may be taken. Additionally, the Company may also notify government authorities if circumstances require. Everyone is expected to cooperate fully as part of any inquiry and to keep the details of any investigation confidential.

All reports of potential violations will be handled or managed by the Chief Compliance Officer. Reports related to accounting, internal control over financial reporting, auditing matters or suspected violations by our Officers or Directors will be referred to the Audit and Finance Committee of the Board of Directors.

All reports of potential violations will be handled or managed by the Chief Compliance Officer. Reports related to accounting, internal control over financial reporting, auditing matters or suspected violations by our Officers or Directors will be referred to the Audit and Finance Committee of the Board of Directors.

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 the Company's Code of Conduct, policies or the law. This includes retaliation against anyone who participates in an investigation of suspected misconduct.

We will investigate allegations of retaliation. Individuals who have engaged in retaliation will be disciplined, up to and including termination of employment. Additionally, the Company may also notify government authorities if circumstances require.



Our Workplace & Respect for Each Other



Our Workplace & Respect for Each Other

Valuing Diversity & Equal Opportunity

We are an equal opportunity employer. We value the diversity and experience of our workforce. We believe this diversity helps to make Albemarle a great company and great place to work.

We are committed to ensuring that all employment decisions are based on skills, job-related abilities, performance and other factors related to a job's specific needs. We "stay true" to valuing diversity and will never base employment decisions on factors that have no bearing on the job, and certainly never on illegal or otherwise improper considerations.

Our commitment to equal opportunity touches on all aspects of the employment relationship such as recruitment, hiring, compensation, benefits, training, promotions and the handling of disciplinary measures. Reasonable accommodations for individuals with handicaps or disabilities will also be made as needed and required by applicable law. Suspected employment discrimination should be reported immediately to your supervisor or HR Representative.

Fair Treatment & Respect

We are committed to a workplace in which each individual is treated fairly and with respect.

We seek to ensure that all who work for Albemarle interact with one another and our business partners with consideration and dignity. We must never act toward another person in a way that could be perceived as abusive, hostile or offensive or that otherwise interferes with a coworker's work performance or environment.



Specifically, you must not:

- Tell jokes or stories or make comments or gestures that others could perceive as offensive.
- Display materials or access Internet sites that display materials that could be offensive.
- Bully, threaten or otherwise act in an intimidating way toward others.
- Make unwelcome or inappropriate comments or advances, including those of a sexual nature, to another person, or engage in other unwelcome conduct, especially when the other person may perceive the request as a condition of employment or when it may create a difficult or hostile work environment.

Offensive actions may also include any inappropriate conduct that reflects on another person's gender, race, ethnic or national origin, marital status, disability, religion, age, color, citizenship status, sexual orientation or other legally protected category.

This is not intended to and does not prohibit legally protected speech concerning safety, working conditions, or other terms and conditions of employment. The Company always welcomes employees' identification of work-related issues and strives to resolve them.

Health & Safety in the Workplace

Maintaining a healthy and safe workplace is a top priority and essential to the continued success of our business.



Compliance with Health & Safety Standards & Guidelines

Injuries and other health issues affect us all and impact our business in many ways. We are committed to protecting your health and safety, as well as visitors to our facilities.

Each of us plays a role in ensuring a safe and healthy work environment and has a duty to adhere to all applicable safety laws and standards. You should always promptly address any issues or concerns that may arise.

Generally, you are expected to:

- Follow all applicable safety laws, regulations, Company standards, policies and procedures related to your job and specific to your operating location.
- Participate in any Company-required health and safety training.

- Know who to contact if an unsafe situation or condition arises so that you can address it promptly.
- Stop any activity you deem to be unsafe and raise your concern with a supervisor before continuing.
- Come to work and go home in a safe manner each and every day.
- Report any unsafe conditions or injuries involving yourself or another person immediately to your supervisor or the Company's Vice President for Health, Safety and Environment.

Please refer to Albemarle's Health, Safety and Environmental Policy Statement for more detailed information and guidance regarding employee health and safety standards and guidelines.

Preventing Violence in the Workplace

Each of us is entitled to a workplace free of risk to personal safety. We will not tolerate workplace misconduct, including acts that reasonably can be perceived as threatening, intimidating, harassing, hostile or abusive. Additionally, weapons of any type are strictly prohibited at all times on Albemarle premises, including Company parking lots or inside vehicles.

If you believe that you or someone else is in imminent danger, always be mindful of safety first, and immediately contact law enforcement. As soon as possible thereafter, notify your supervisor and the site safety manager. All other perceived or actual acts of violence should also be reported to Human Resources and your supervisor promptly.

Substance Abuse

Abuse of illegal drugs or other intoxicants, including misuse of alcohol, creates an unsafe environment for all of us and is strictly prohibited at all times when working for, or on behalf of, the Company. We prohibit the possession or use of illegal drugs and unauthorized controlled substances. Alcohol may be used only at approved Company functions, and you are expected to act responsibly and abide by all local laws and regulations. Under no circumstances should you operate a vehicle or any machinery while impaired or under the influence of alcohol or drugs.

If you use a legally prescribed medication that is likely to impact your work performance or create a safety risk to yourself or others, discuss the matter with your supervisor or Human Resources in advance of beginning work under these conditions.



To protect our employees' safety and Company interests, and where allowed by law, we may require drug or alcohol testing for employment applicants and may conduct random drug and alcohol screening for employees.

Labor Practices & Human Rights

We support and value human rights and are committed to complying with all applicable laws and standards related to labor practices and human rights in all of our operating locations. This includes:

- No child or forced labor.
- Following requirements under International Labour Organization (ILO) rules and Works Council agreements as applicable.
- Adhering to immigration standards and laws.
- Never interfering with employee rights such as freedom of association and collective bargaining.

Safeguarding Employee Information

We respect the confidentiality of our employees' personally identifiable information ("PII" or "Personal Data") and other sensitive information, and we must safeguard this sensitive information to the fullest extent possible. This protected information, such as names, home addresses, national identification/social security numbers, compensation data, resumes, application materials, benefit information, etc., as well as particularly sensitive information such as racial or ethnic origin, health or trade union memberships is maintained by Albemarle in accordance with applicable laws and is used

for legitimate business purposes only. Access to this information is limited only to those with a business need to know. PII may not be used for personal purposes, used for the commercial benefit of any entity other than Albemarle, disclosed to unauthorized persons, or made available in any way other than its authorized use. Violating applicable data protection laws can damage Albemarle's reputation and carry a steep financial cost. If you process PII held by Albemarle, it is important that you respect the protection of PII and privacy. Any processing of PII is subject to Albemarle's privacy policies and procedures, in particular the Internal Data Protection Policy. Please read and familiarize yourself with that policy.

It is Albemarle's policy to process PII or Personal Data lawfully, fairly, in a transparent manner, for limited purposes, adequately and not excessively in light of the business purpose, accurately, with proper retention periods, with integrity and confidentiality, and in an accountable, documented manner. Albemarle has implemented appropriate security measures to protect PII.

No person at Albemarle may collect, process, or use PII without authorization. Any unauthorized employee is strictly prohibited from engaging in the processing of PII, and authorized employees are required to collect, process, or use PII only as necessary to fulfill their legitimate job functions.

Albemarle's obligation to keep your PII confidential continues after you leave the company. We may continue to process PII to comply with our legal obligations and data retention requirements.

Like most other companies, Albemarle contracts with third party service providers to perform specific tasks such as consulting services, software hosting and licensing, HR support services, etc. With regard to third parties, Albemarle uses its best efforts to obtain strong data processing agreements, using templates that set forth the responsibilities and liabilities of the third parties under applicable data protection. A supplier due diligence should always be carried out before engaging new providers.

Employees' Rights Regarding Their Information

In regard to their PII, each employee has the right:

- to request information on which PII relating to him/her has been stored, how the PII was collected, for what purpose, and for how long the PII will be stored;
- to request the identity of any third party recipient of PII or the categories of recipients;
- to request the correction or supplementing of any incorrect or incomplete PII;
- to request the deletion of his/her PII if the processing of such PII has no legal basis, or if the legal basis has ceased to apply. The same applies if the purpose behind the data processing activity has lapsed or ceased to be applicable for other reasons. Existing Albemarle data retention requirements must, however, be observed;
- to generally object in writing to his/her PII being processed, and this must be taken into account if the protection of his/her interests takes precedence over Albemarle's interest, based upon a particular personal situation. This does not apply if a legal provision requires or allows the data to be processed;
- to restrict Albemarle's processing of his/her PII under certain circumstances;
- to data portability (transfer of PII to the employee or to a third party nominated by the employee).

No action can be taken against an employee for invoking their rights. If relevant employment law provides for further rights of access to employee documents (i.e. employee files), these rights remain unaffected.





IV

Protecting Company Assets



Protecting Company Assets

Use of Company Assets & Resources

Each of us is expected to safeguard Company assets and use them efficiently, responsibly and for their intended business purposes.

It is important for the long-term success of our Company that we do not abuse, misuse, misplace or improperly dispose of our Company assets. Examples include our facilities, equipment, Company funds, Company time, computers, other technology systems and equipment and proprietary information that we use in the course of our daily business activities. Improper use, carelessness or theft of any Company asset negatively impacts our business and will not be tolerated.

Business Purpose

Generally, our assets and resources are intended for business purposes only and serve to advance our business success. In very limited situations and with approval of your supervisor, occasional personal use may be allowed as long it does not interfere with your work or responsibilities in any way, does not create a financial loss or cost to Albemarle, and is not otherwise improper or in violation of our Code, Company policies or the law.

Acquiring Assets & Resources

In addition to safeguarding our existing assets, we must always use care when acquiring assets for Albemarle. Acquired assets and resources must be appropriate for their intended business purpose, acquired at a fair and reasonable price and legally and ethically obtained.

Company Monitoring

To promote productivity, appropriate business use, and to safeguard our assets, we monitor our facilities, vehicles, technology systems and resources, telephone calls, and e-mails and, in certain situations, record this monitoring to the extent allowed under the law.

Information Technology Systems & Resources

Our technology systems and resources are important tools for our success. We are all expected to use good judgment and comply with the law, the Code and our policies when using any electronic means of communication, whether it is through telephone, e-mail, instant messaging, intranet, internet or any other means of electronic transmission.



Use of Technology Systems

Generally, our technology systems and resources are intended for activities that further the business of Albemarle, and improper use can damage not only our IT infrastructure but also our Company's reputation and our businesses.

We must never use our technology systems and resources to:

- Download unapproved software or other enhancements to our systems.
- Transmit our intellectual property, legal or privileged information without Company authorization and approval.
- Gain unauthorized access to computer systems with the intent of (1) obtaining intellectual property including trade secrets or other confidential information, (2) destroying, impairing or otherwise injecting a "virus" into other systems or (3) committing any other type of computer fraud or theft.
- Communicate or act in a way that may be offensive, abusive, inappropriate, harassing or discriminatory.

If you require further clarification on the use of our technology systems, please contact the IT Help Desk.

Cyber Security

Cyber crimes are evolving with advances in technology. Computer hacking and email scams are among the highest risks of sharing information online.

Our IT Department has systems in place to monitor our IT networks for breaches and malware, and also to blacklist suspicious emails. While these systems are effective, they cannot guarantee complete protection from Internet fraudsters who use



sophisticated tactics to steal information from employees or the Company, or seek to damage the Company's assets.

It is not just the IT department's job to safeguard our technology systems from cyber crimes; we each have a part to play. With respect to all of the sensitive and/or confidential information that Albemarle collects and maintains, everyone at Albemarle is obligated to take precautions to protect this information from loss, unauthorized access, or theft. There are two types of data breaches: accidental and malicious. Human error or carelessness can lead to accidental breach, including something as simple as sending an email attachment containing protected data to the wrong recipient. Malicious data breaches, on the other hand, include one or more of our employees deliberately or intentionally sending protected data to a third party; using protected data for a purpose other than what is approved, e.g. using an employee's social security number to obtain credit cards or lines of credit without the employee's approval or knowledge; or deliberate internal or external attacks on an Albemarle's data systems.

Here are some tips for recognizing fraudulent emails and websites:

Emails

- If you receive an email that is not from a person you know or a company you have a relationship with, do not open it.
- When in doubt, never click on a link in an unsolicited or suspicious email. If the email requests that you click a link or demands a reply to verify confidential information (i.e. bank account information, customer information, etc.) you could be the target of a phishing attempt.
- Always carefully evaluate an email before opening or downloading any attachments.
- If an email looks suspicious or too good to be true, it probably is. Be cautious of any communication with poor grammar and spelling.

Websites

- Look closely at the website address before providing any information or logging in. If the address looks odd or unfamiliar, close your web browser. Best practice for visiting any website is to type the URL into the browser manually.
- Suspicious content that attempts to scare you into providing login and account information, or is full of misspellings and poor grammar can be an indication you are on a phishing site.
- A secure site's address will start with <https://>. If this indicator is missing, do not enter the site.

If you have any questions about cyber security, contact your local IT support or the IT Helpdesk.



Data Breach

A breach occurs whenever PII or confidential or restricted data in the custody or control of Albemarle, or in the custody or control of Albemarle's contracted partners, may have been stolen, lost, or subject to unauthorized access. In the context of PII or Personal Data, a breach also includes the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, PII or Personal Data transmitted, stored or otherwise processed. All employees must report security incidents, suspected Breaches, Breaches, or data loss, and Albemarle uses its best efforts to ensure that all third parties authorized to process employees' PII have contractual commitments to report Breaches promptly. Employee reporting can occur in one of the following ways:

- Contact the Albemarle Integrity Helpline and choose the option for Data Privacy;
- Email DataBreach@albemarle.com;
- If the breach does not involve PII or Personal Data, speak with a supervisor;
- If the breach involves PII or Personal Data, speak with the Chief Privacy Officer.

Supervisors who receive reports or concerns of potential Breaches should:

- Be sure you understand the issue;
- Support the person who raises the concern;
- Never let employees feel that their concerns are being ignored;
- If uncertain about the correct course of action, seek guidance from the Chief Privacy Officer. Never investigate a suspected breach on your own;
- Ensure that the reporter does not face retaliation;

For Albemarle's comprehensive plan in case of a breach, please see Albemarle's Personal Data Breach Response Guide.

If you have any questions about cyber security, contact your local IT support or the IT Helpdesk. Do not communicate any information regarding a breach to any unauthorized employees or any third party outside of Albemarle without prior explicit written approval from Albemarle.

Social Media

Social media outlets are an important method of personal and business communications. Remember to use care and consideration in posting or sharing anything on external social media sites, especially as it relates to the Company.

For specific guidance you should review our Social Media Guidelines, but here are a few general rules:

- Be careful to never disclose confidential Company information on social media.
- When you discuss the Company or non-confidential Company-related matters, such as Albemarle products or services, make it clear that you are speaking for yourself and not on behalf of Albemarle.
- When participating in a discussion or posting information relating to Albemarle, its products, or its customers – do not make unsubstantiated claims about performance or pricing.
- Be respectful toward Albemarle, your fellow employees, partners and your community.

We should always remember that electronic messages (such as emails and text messages) are permanent, transferable records of our communications and can affect the reputation of our Company.

Safeguarding Company Intellectual Property

Safeguarding Our Information

We create sensitive business information that is critical to our success. We must

always ensure that this information is safeguarded and protected. Accessing, using or disclosing this information improperly can harm Albemarle and have serious consequences for the individuals involved. Consequences may include discipline up to and including termination of employment, and civil and criminal penalties.

Intellectual Property

We broadly define intellectual property as all information that provides us with a competitive advantage and whose access and/or disclosure we want to control and protect.

Examples of such information include:

- Innovations and other unique works or materials protected by patents, trademarks or copyrights
- Trade secrets
- Business, marketing and service plans
- Engineering and manufacturing ideas and designs
- Strategic business plans and financial forecasts
- Company databases
- Any unpublished financial information

During the course of employment, you may develop ideas, processes and/or technology that may be protected as intellectual property. If you develop such intellectual property, inform your supervisor so that we can determine whether and how to protect it. You must disclose to us all inventions and discoveries conceived during employment. Safeguard all company intellectual property by affixing protective labels to this material in accordance with our procedures, and ensure that others do not improperly use it.

Safeguarding Information of Others

As part of our daily work, we may collect business or personal information belonging to our customers, suppliers, former employees, contractors, job applicants, shareholders or other third parties, and we will manage and process this information in accordance with our legal and contractual commitments. Examples of such information can include sensitive and confidential business information obtained from our partners, such as terms and conditions of our relationship, business plans, etc., as well as personal customer information. When we are entrusted with this information, we must always treat it with care and protect it from improper use or disclosure. This information is only for authorized business purposes and can be shared only with other authorized individuals with a legitimate “need to know.” In addition, certain countries strictly regulate how a company or its employees can use and transmit this sensitive information. Seek guidance from the law department before transmitting or sending business or personal information across country borders, since global privacy and

data protection laws can restrict when and how a company can do so. You are also cautioned to use copyrighted information appropriately and legally at all times. The unauthorized duplication of copyrighted material, including copyrighted computer software, is a violation of copyright laws and is strictly prohibited.

If you are contacted by anyone outside of the Company requesting business or personal information of Albemarle or of others as described in this Code, you must immediately contact your supervisor or the law department for guidance before providing the information.

Safeguarding Our Records

Our documents and information, e-mail, media, etc., are considered important Company assets, and we must manage these records in accordance with our policies and as required by the law. All of us need to be familiar with the proper management and retention of Albemarle records and information. Refer to our Corporate Records Retention Requirements Policy for more detailed information and guidance.

Obligations Beyond Employment

Your duty and responsibility to “stay true” and protect and safeguard Albemarle assets, resources and information extends beyond your employment with us.

Your obligations include the following:

- As you leave Albemarle, you must promptly return all equipment, records and other Company assets and resources in the condition that they were received during employment.
- Do not retain, use, share or disclose any confidential or proprietary information obtained during your employment.

Failure to adhere to these important obligations can result in serious consequences, including civil and criminal penalties under the law.



Avoiding Conflicts of Interest



Avoiding Conflicts of Interest

We should act in the best interest of Albemarle at all times and not allow personal interests to conflict with this responsibility.

What is a Potential Conflict of Interest?

A conflict of interest exists when an individual has a direct or indirect personal interest in a transaction or situation that affects, or appears to affect, his/her judgment and divides his/her loyalties between personal interests and those of the Company. Such situations are not always easy to avoid. When a conflict of interest arises, it is important to act with great care to avoid even the appearance that actions are not in the best interest of the Company.

You are required to promptly disclose and discuss any potential conflicts of interest with your supervisor or the General Counsel, who can help you determine whether the situation may be an actual

conflict and, if necessary, what steps you can take to resolve the matter.

Outside Activities & Employment

The following are potential conflicts of interest:

- Serving in any way (such as a director, officer, consultant or employee) with an organization, even if only part of the time, that may conduct business with or competes with Albemarle, including a personal business.
- Being involved in any other employment or activity if doing so interferes with your Albemarle job responsibilities.
- Using your position or title in connection with an outside activity that may suggest Company sponsorship or support.
- Using Albemarle property or information or your position for personal gain or interest.
- Using any Company resources or facilities in connection with an outside activity, unless approved by your supervisor.
- Acting as a broker or other intermediary for another party in transactions currently or potentially involving Albemarle or its interests.
- Making presentations or submitting articles or other writings related to your professional area unless approved by your supervisor.
- Using Company time for an outside business or other personal activities.
- Solicitation or distribution of materials related to an outside activity.

Review any potential situations with your supervisor before they occur to ensure that these situations are not likely to become actual conflicts.

Improper Financial Interests

Personal financial interests in our customers, suppliers, other business partners or competitors can create or appear to be a conflict of interest.

Our actions should always reflect our commitment to act in the best interest of Albemarle.

We should not hold a financial interest in the businesses of our customers, suppliers, other business partners or competitors, unless:

- These interests are part of a fund where you do not control the purchase or sale of individual securities, such as a mutual stock fund, index funds or similar pooling of securities.
- You have received prior approval from the Chief Compliance Officer.

Doing Business with Family and Friends

Personal relationships with family members, friends and others should remain just that—personal. It is important to keep these relationships separate from work. We should never allow them to interfere with business decisions, such as employment or purchasing transactions.

You should not supervise, directly or indirectly, report to or work closely with a family member or household member. Also, do not try to improperly influence hiring or other employment decisions regarding a family or household member or close personal friends.

You should not conduct Albemarle business with a family member or a member of your household who works for a customer, supplier or other business partner. Relationships with any other party can also become a conflict anytime they compromise your business judgment.

If you find yourself in one of these situations, or have questions as to whether the particular relationship is the type of relationship covered under this section, be sure to seek guidance.

Corporate Opportunities

In the course of your work with Albemarle, you may learn about or help to develop business opportunities. You must ensure that you do not take improper advantage of these situations. We must never personally take opportunities that are discovered through the use of Albemarle property, resources, information or position without the consent of the Chief Compliance Officer. This prohibition is particularly important to our officers and Board of Directors, who have a special fiduciary duty obligation to Albemarle and its shareholders.

Generally, you must never use Albemarle property, information or position for improper personal gain or take any action that competes with Albemarle either directly or indirectly.

Bribes & Kickbacks

We win business based on our reputation and the quality of our products and services and never by improperly influencing others. Bribery and kickbacks are unethical and also illegal in most countries. Bribery is an attempt to influence a person's business decision by offering that person something of value. Something of value may be intangible, like a favor or promise to provide something in exchange for future business.

A kickback is a type of bribe in which a portion of a payment is returned to the provider for making an improper payment or for doing business with a particular company. You should never offer, solicit, pay or accept a bribe or kickback or allow others to do so on the Company's behalf.

We are also prohibited from providing or offering anything of value to a government,

political or other public official in order to influence any act or decision of such public official; there are many laws that strictly prohibit such activity, and the consequences for violating these standards are severe for the individuals involved as well as Albemarle (see Code Section "Improper Payments" for more information).

Our agents, distributors and contractors are held to the same standards as Albemarle employees. You must never knowingly allow any third party working on our behalf to offer, solicit, pay or accept a bribe or kickback or to offer anything of value to a government, political or other public official or any other entity with which we do business. If you are unsure whether your actions may be perceived as a bribe or kickback, seek guidance from the Chief Compliance Officer or the General Counsel before taking action.

Gifts & Entertainment

Traditionally, offering and receiving business gifts, meals and entertainment strengthens business relationships, builds goodwill or shows a gesture of respect for others' customs. When done within established limits, these activities continue to be a lawful and appropriate business practice. When dealing with customers, partners, and/or government officials, employees must ensure they offer, give, and receive gifts, provide meals or entertainment, and pay for travel only if it is of reasonable value, complies with the recipients' own laws and corporate regulations, is infrequent, and is not given with any intent to improperly influence the person's actions or decisions. Further, any gift or entertainment provided to a third party under these guidelines must be properly reflected in the Company's books and records.

To avoid a conflict of interest or the appearance of a conflict of interest, our company and its employees will not accept or offer gifts or gratuities, except those associated with common business courtesies of a nominal value. Gifts of nominal value that are considered acceptable are item such as pens, hats, t-shirts, mugs, calendars, bags, key chains and portfolios, which commonly have the Company logo imprinted on them.

Meals and entertainment must support the legitimate business interests of the Company and should be reasonable and appropriate under the circumstances and in line with local custom for business-related meals and entertainment. We do not offer or accept meals or entertainment in exchange for doing, or promising to do anything for a customer or supplier.

These guidelines apply even when personal funds or assets are used and no reimbursement from the Company is sought. Any time the business courtesy may be seen as being given on behalf of the Company, these guidelines must be followed.

Questions regarding the appropriateness of any gift or entertainment should be directed to your supervisor or the Chief Compliance Officer.



Inside Information & Insider Trading

Customers, suppliers, Albemarle shareholders and others trust us to use business information properly and never for wrongful purposes.

Improperly disclosing our material nonpublic information or that of our business partners is against many countries' laws and is always improper.

In addition, you may not buy or sell, or make any recommendations to others to buy or sell securities of any publicly traded company based on material nonpublic information that you obtain through your position at Albemarle. Information is "material" if it is important enough to affect a reasonable person's decision to buy, sell or hold securities, and is nonpublic if it has not been the subject of a company news release, disclosed on a company's website or made broadly public in some other way.

Examples of material, non-public information include:

- Proposed mergers or acquisitions;
- Major product introductions;
- Financial or operational projections or results;
- Lawsuits and government investigations;
- Changes in senior leadership;
- Gaining or losing clients or significant business partners;
- A significant cybersecurity incident experienced by the company;
- Competitive strategies and plans.

Securities can include stocks, bonds, stock options, rights and warrants, to name a few types. This requirement relates not only to

transactions with respect to stock and other securities but also to any situation or business dealings where material, nonpublic information may be used as the basis for inequitable bargaining with an outsider or used for some other improper purpose. Violations of this policy and related insider trading laws are serious legal and ethical breaches, and violations can result in severe consequences for the parties concerned, including possible civil and criminal penalties. If you have questions regarding this policy or your related responsibilities, contact the General Counsel or Chief Compliance Officer prior to trading securities or engaging in related activities. Also, for additional information, refer to Albemarle's Insider Trading Policy.

Political Activities

We are committed to participating constructively in the political process with the ultimate goal of advancing and protecting the best interests of Albemarle, our shareholders and our employees.

It is important that Albemarle maintains a reputation of integrity with the public. We must act properly in our dealings with government officials, regulatory agencies and other political organizations, and demonstrate our commitment to openness and responsible business practices.

Political activities and related contributions are subject to extensive governmental regulation and public disclosure requirements, and Albemarle is fully committed to complying with all applicable laws. In the U.S., political contributions at the federal level are made by the Albemarle Corporation Political Action Committee (Albemarle PAC), which is funded

entirely by the voluntary contributions of eligible employees. Our contributions at the state and local level are based on advancing the best interests of Albemarle, our shareholders and our employees, including consideration of our interests in a particular state, legislative activity in that state, Albemarle facilities and employees in that state and local political factors.

We value the right and responsibility of our employees to participate in the political process, including individual activities supporting a party, candidate or political issue. Such activities, however, must not suggest Albemarle's support and must not be conducted on company time or involve the unauthorized use of company resources. Albemarle will not require employees to make personal political expenditures, including contributions to Albemarle PAC, or take any retaliatory action against employees who do not.

For additional information, refer to Albemarle's Political Contribution Policy.



VI

Our Business Relationships



Our Business Relationships

We strive to outperform our competition fairly and honestly.

Fair Competition & Competitor Relations

We obtain our competitive advantage through superior performance, never through unethical or illegal business practices. Albemarle will always “stay true” to our core values and is fully committed to dealing fairly with our customers, suppliers and competitors.

Antitrust and competition laws are intended to eliminate unreasonable restraints of trade, monopolization, price discrimination and unfair trade practices. They foster a marketplace in which companies compete fairly and evenly.

We must strictly adhere to all antitrust and competition laws at all times and wherever we operate. This applies not only to our employees, but also to third parties acting on our behalf. Violation of these laws can result in serious legal consequences if individuals (1) have communications or agreements with competitors on prices, output or capacity rates, sales terms and policies or customer selection or classification (except for usual credit information), or (2) attempt to suggest or agree with a competitor, supplier or customer on how they should deal with others or (3) attempt

to use perceived market power to unreasonably coerce competitors, suppliers or customers to take — or not take — certain actions.

For more information regarding these important laws and when questions arise regarding your responsibilities, please seek guidance from your supervisor, the Chief Compliance Officer, the Albemarle Law Department or refer to Albemarle’s Antitrust Compliance Guide before taking action.

Competitor Information

We will not engage in illegal or improper acts to acquire a competitor’s trade secrets, customer lists, pricing information, sales or marketing plans, financial data, operations data, technical developments or other confidential information in any form. In addition, we will not hire competitors’ employees for the purpose of obtaining confidential information or urge competitors’ employees or customers to disclose this type of information.

You must ensure that any product comparisons are based on a competitor’s publicly available marketing, communications and other factual data that is derived legally and ethically.

Competitor Representations

Always represent products truthfully, accurately, fairly and in good taste. Follow all laws and regulations, industry standards and our policies and procedures in the development, review and dissemination of marketing material, including advertising. With regard to our competitors, always remember that we compete in the marketplace based on the strength of our products and services, not on the weaknesses of our competitors.

Never disparage competitors or their products or services. Contact the Corporate Communications Department for guidance on proper marketing, advertising and public communications.



Relationships with Suppliers & Other Third Parties

Our reputation in the business community is of the highest importance and essential to our ongoing success.

Working with Third Parties

All agents, distributors, consultants, suppliers and other parties contributing to our business or doing business on our behalf represent Albemarle both directly and indirectly and, as such, are expected to uphold our high standards and values at all times. This includes adherence to the standards set forth in this Code, compliance with the law at all times and following our Company policies applicable to their activities.

We are responsible for the selection, supervision and management of third parties to ensure that these entities protect our reputation and adhere fully to the law, standards and principles set forth in this Code (See the Company's Supplier Code of Conduct for more information).

When dealing with third parties:

- Never direct or use a third party to conduct improper business activities.
- Immediately report suspected wrongdoing of any third party working with us or doing business on our behalf.
- Carefully review credentials and references of potential third parties prior to selection.
- Ensure third parties are provided with a copy of, or given access to our Code, and set expectations regarding adherence to our standards, the law and applicable Company policies while doing business on our behalf.



- Ensure ethical and legal expectations are properly communicated in any agreement or contract with a third party prior to engagement, and oversee and monitor compliance with these obligations.

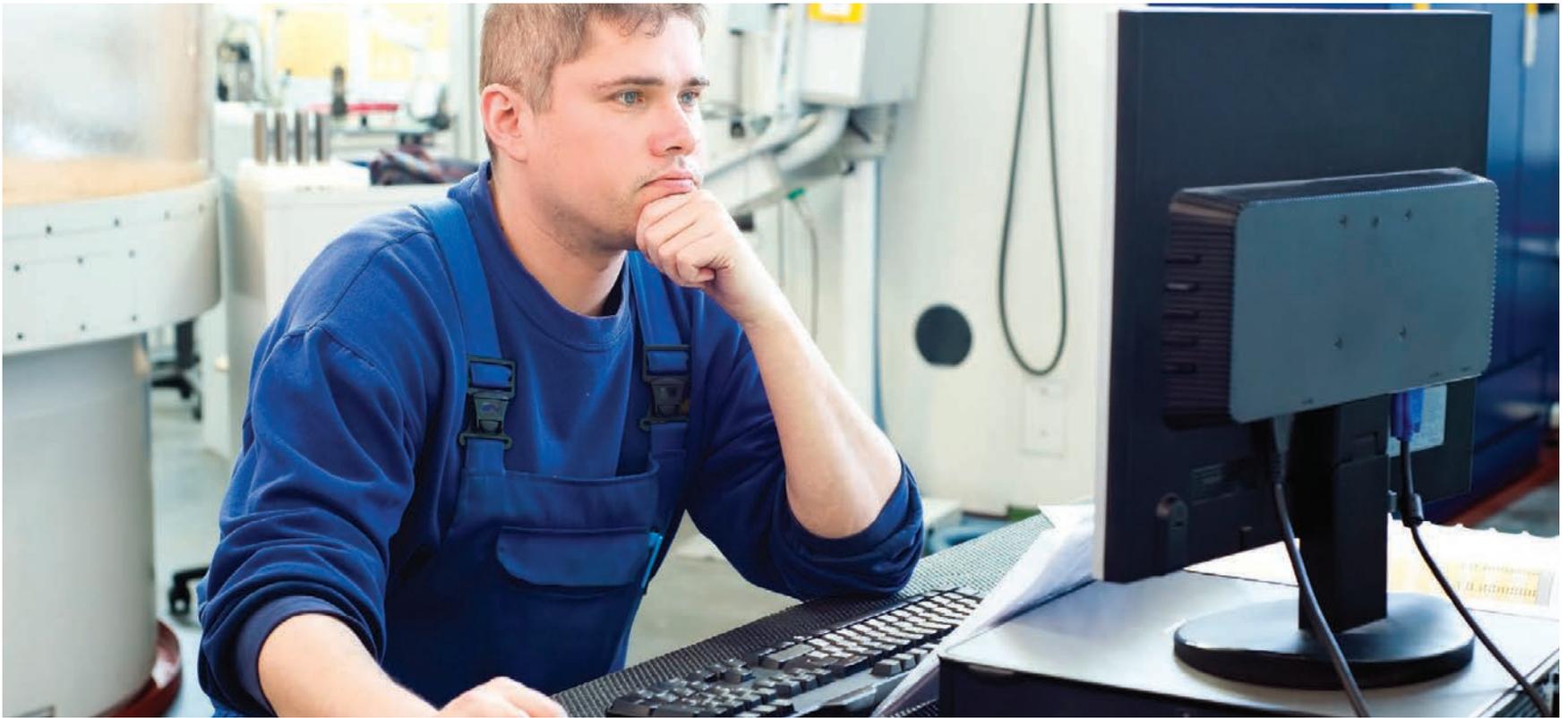


Relationships with a Government or a Government Official

Business relationships with a government can be complex. Full compliance with the rules applicable to these relationships and activities is essential in all of our operating locations. These rules often address topics such as proper contracting methods and standards, proper procedures for obtaining business, marketing and sales activities, restrictions on gifts and entertainment, reporting company data and certain other requirements for doing business with these entities. Companies and individuals that violate these rules can face harsh penalties, including criminal prosecution. If you deal with governments or their officials either directly or indirectly, you are expected to know and carefully follow applicable rules and guidelines.

If you have questions or are unsure how to do business with a government or government officials, seek guidance prior to engaging in the business activity.





Serving Our Customers

Our customers are the key to our continued business success. We are committed to providing only top-quality products and services to them, coupled with a world-class level of customer support.

When purchasing and using our products, customers count on us to provide honest and accurate information regarding marketing, advertising, labeling and necessary safety information. Our customers also expect that our products are safe for their intended use.

Each of us responsible for manufacturing, safety, distribution, marketing, sales and customer service must ensure that we live up to these customer expectations at all times and comply with all applicable laws, standards and Company policies and procedures governing these important activities. In doing so, we ensure our continued business success and high level of customer confidence.

External Communications

Our public communications are important to our image, reputation and brand.

We are committed to providing fair, accurate and timely information in our communications at all times. We must present this information in a way that represents Albemarle in a unified and consistent way.

Because public communications can have an impact on our business, we must not share any information regarding our business and operations with outside parties, unless specifically authorized to do so. In some cases, information shared, either intentionally or unintentionally, may not be intended for public disclosure. Sharing this information can result in serious business, legal and reputational consequences for the Company and individuals involved.

All external requests for information should be referred to our Corporate Communications Department or the Law Department. For any government inquiries, contact your supervisor and the Albemarle Law Department immediately to ensure we can respond to these requests and inquiries in a timely way.



VII

Commitment to Financial Integrity



VII

Commitment to Financial Integrity

We are committed to integrity in our financial accounting, reporting and auditing practices.

Timely & Accurate Financial Accounting & Reporting

We are committed to providing full, fair, accurate, timely and understandable disclosures and information in all our public communications. We are further committed to ensuring that these disclosures are accurately and completely recorded and retained in accordance with applicable laws, corporate policies and Generally Accepted Accounting Principles (GAAP). Maintaining high standards in financial accounting and reporting practices fosters respect and confidence from our shareholders and the public and ensures compliance with all applicable laws and standards governing these activities.

Maintaining Accurate Books & Records

Our books and records are directly tied to our financial accounting and reporting activities. We rely on the timeliness, accuracy and completeness of these records in making important decisions about our business and to inform the



public, shareholders and regulators about the health and performance of our operations. Because accurate books and records are critical to our continued business success, all assets, liabilities, revenues and expenses of the Company must be properly recorded in appropriate Company books and records. Albemarle's books and records are more than just balance sheets, rather they encompass documents you may see on a daily basis such as time cards, invoices, purchase orders, etc. All entries in the Company's books and records must properly reflect the nature of the transactions in compliance with applicable accounting rules and the Company's system of internal controls.

Our financial records, accounting records and reporting practices will be audited periodically and as required to ensure compliance with all applicable laws, standards and guidelines.

Responsibilities & Compliance

To ensure we uphold these important standards, it is critical to:

- Always communicate and report financial and other business information accurately, honestly, completely and in a timely way.
- Never create false, incomplete or misleading financial entries or records.
- Only use Company funds and related assets for authorized and legal business purposes and never place funds in personal or unrecorded accounts.
- When funds are paid to third parties, these funds must be used only for the purpose identified in the transaction documentation.
- Cooperate fully and honestly with Company authorized internal and external audit/accounting resources and government agencies/regulators.
- Immediately report any suspected wrongdoing or irregularities related to financial accounting, reporting or business activities.

Failure to comply with these requirements can have serious consequences for the Company and individuals involved, which may include civil and criminal penalties as well as termination of employment. If you are unsure of how to properly handle a financial transaction, suspect that information has been improperly reported or recorded or suspect that a wrongdoing has occurred in any financial-related activity, you should immediately report the matter to the Chief Compliance Officer or the Integrity Helpline.



VIII

Doing Business Globally



VIII

Doing Business Globally

We are committed to complying fully with all applicable laws that govern our business.

Global Laws & Our Business Across Borders

Each of us doing international business is expected to comply with this Code, and to be knowledgeable of, and comply with, all applicable laws and standards that apply to our business.

Violation of these laws may result in severe civil and criminal penalties for Albemarle and the individuals involved, as well as disciplinary action taken by the Company, up to and including termination of employment. The rules governing our obligations under these laws are complex. Seek guidance before taking any action if you are unsure it complies with these laws and regulations.

Improper Payments

Our business success is based on the quality and integrity of our products and services. We should never win business or obtain a government license or permit because we gave the decision maker cash, a gift, or personal favors. This type of activity, whether it is done by an Albemarle employee or anyone acting on our behalf,



could constitute bribery. Every country in which we do business prohibits bribery and prosecutes companies and individuals for violating anti-corruption laws. Some laws are directed primarily at bribing people who work for the government. Others are aimed at both commercial and governmental bribery. Our Foreign Corrupt Practices Act Guidelines goes into detail about activities that are permitted and those that are prohibited. Two of the most important anti-bribery laws are the U.S. Foreign Corrupt Practices Act (FCPA) and the 2010 U.K. Bribery Act. The FCPA makes it illegal to offer a bribe and to actually bribe a foreign government official if either is done with the intent of getting that person to do something improper. The definition of a foreign official is very broad and could include someone working as a procurement manager at a partially

state owned enterprise, a customs agent, a politician or a government minister. The U.K. Bribery Act, like the FCPA, prohibits the bribing of anyone in the public sector, but also prohibits bribery in a business-to-business setting without any connection to a government official. Prohibited offers or payments can include entertainment, gifts, money, or even personal favors outside the normal course of business. Facilitating payments are small amounts of money that are paid to a government official to take an action which is typical and standard for a person in that position. While under the FCPA a genuine facilitation payment is not an “improper payment,” it is against Albemarle policy for any Company employee or agent to pay a facilitating payment.

Consequences and penalties for violations of these laws are severe for both Albemarle



and the individuals involved. Strict adherence with these laws is required. For more information and guidance regarding your responsibilities in this area, refer to Albemarle's Foreign Corrupt Practices Act Guidelines or contact our General Counsel or Chief Compliance Officer.

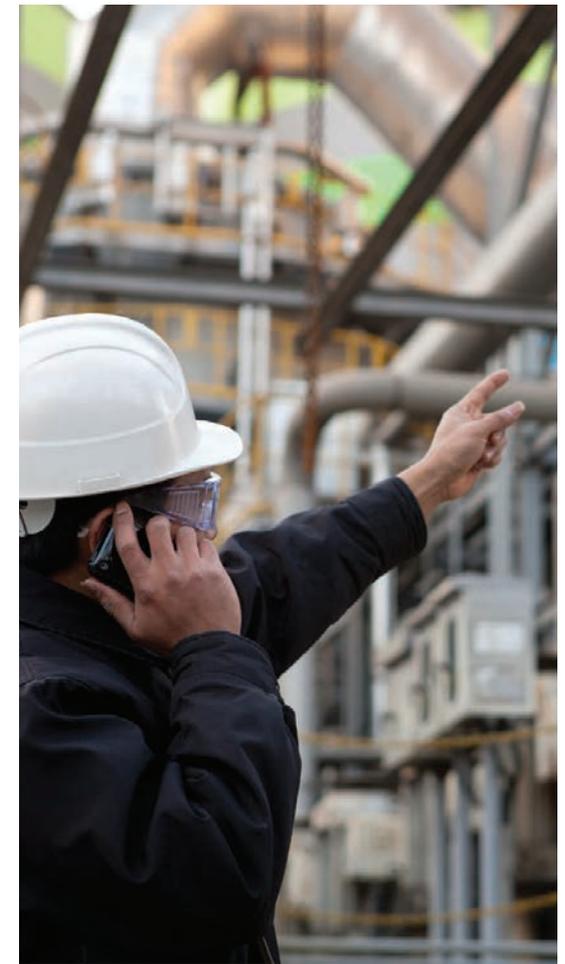
International Trade & Regulation

There are both U.S. and international trade laws and regulations that govern moving goods, services and technology across borders. You must comply with these standards at all times. If your work involves any operations outside the U.S. or involves activities between countries and you are unsure of your legal and ethical obligations, be sure to seek guidance from your supervisor, the Global Director of Trade Compliance or the Law Department before taking action.

Anti-Boycott Laws

We must comply with U.S. anti-boycott laws at all times. U.S. anti-boycott laws prohibit Albemarle from cooperating with any international boycott of a country or countries where such boycotts are not sanctioned by the U.S. government or from complying with or supporting a country's boycott of another country that is "friendly" to the U.S.

An illegal boycott request can be made in such documents as bid invitations, purchase contracts, letters of credit or orally in connection with a transaction. Such a request might even take the form of a contractual provision that simply requires compliance with a country's law that includes an obligation to engage in a prohibited boycott. In addition to not cooperating or complying with illegal



boycotts, U.S. law requires that companies report promptly to the U.S. government any request received to participate in prohibited boycotts or requests to furnish information regarding or supporting such boycotts. Any requests or activities of this nature should be immediately reported to the Law Department. Also, for further clarification, you should refer to the Albemarle Anti-Boycott Guide.





Import/Export Control Laws

It is our policy to comply faithfully with the import and export regulations and laws of the countries in which we operate. Every country in which we do business maintains a complex set of regulations that govern the Company's activity and ability to export goods, services and technology from one country to another. Additionally, regulations control the export of goods to specific sanctioned countries and/or restrict the export of certain goods or technologies.

All of these various export regulations are designed to protect domestic economies, to address national security concerns and/or to advance foreign policy goals.

Often, violations of these laws and regulations arise from a lack of oversight, especially with respect to routine transactions involving affiliated companies located abroad.

The laws and requirements related to both import and export controls are complex. We must be knowledgeable of the standards and requirements and comply fully at all times. If you have questions regarding your responsibilities or obligations under the law, seek guidance from your supervisor or the Law Department.



IX

Commitment to Our Communities & Citizenship





IX

Commitment to Our Communities & Citizenship

At Albemarle, “staying true” to our core values means that we are committed to improving the quality of human life through our innovative products and doing the right thing in our communities.

Our Commitment to Sustainability

We believe our talents and resources give us the opportunity to develop harmonious economic, social and environmental solutions to the world’s demands for products and services. Our innovative capabilities can make a profound difference on society and the environment, while also creating a successful business model that delivers dependable, consistent value to our stakeholders.

Each of us is expected to uphold and live our commitment to sustainability in all we do. For more information on this important commitment, please refer to our Sustainability Reports found on our website under the Sustainability tab.



Health, Safety & Environmental Protection (HSE)

In our business, health, safety and environmental protection are critical to our sustainable growth.

We understand our important role as a corporate citizen and local community member and must ensure we do our part to help safeguard the natural environment. As a primary business objective, we continue to appreciate our role in HSE protection by including occupational, process safety and environmental considerations in our business planning and operations, and promptly addressing HSE challenges that arise. Additionally, we continue to pursue our goals of reducing our energy usage, carbon footprint and chemical emissions.

Examples of our efforts in this important area include:

- Reducing materials, water and energy use.
- Reusing equipment, supplies and products.
- Recycling items that would otherwise be discarded.
- Minimizing and, where possible, eliminating waste, and following all waste disposal procedures.
- Following strict procedures in use, storage, movement and disposal of hazardous and other toxic substances.
- Evaluating the synthesis of new chemicals and their impacts throughout their lifecycle to minimize adverse impacts to people and the environment.

- Developing robust management systems to ensure that chemicals are properly contained and disposed of in an environmentally safe manner.
- Designing our manufacturing equipment and processes in a robust fashion to ensure that we control the process from beginning to end and have no unintended consequence from our operations.

We must follow all applicable laws and regulations, including local laws, and Company policies and procedures related to HSE protection.

Each of us should support our commitment to this important area in the following ways:

- Immediately report issues and problems, such as chemical spills or releases, and raise concerns about other potential environmental risks.
- Cooperate fully during any regulatory reviews or inspections.
- Stop any operations that pose an immediate threat to the environment or to the safety and health of our co-workers and visitors.

- Monitor compliance with all regulatory standards to improve operations.

Albemarle strives to keep its commitment to our communities and the environment. We will provide notice to the public regarding important aspects of this commitment as appropriate, including reporting on the environmental impact of our operations. For more information, refer to Albemarle's Health, Safety, Security and Environmental Policy found on our website at www.albemarle.com.



Community Support/Volunteerism

We embrace the opportunity to build mutually beneficial relationships with the communities in which we live and work.

We actively support our communities through the Albemarle Foundation, the Albemarle Care Fund and various Company-sponsored activities. You are encouraged to contribute funds to charitable organizations of your choice and participate in volunteer activities, including the Albemarle Foundation and Albemarle Care Fund, to the extent possible, but are never required to make contributions to Albemarle sponsored activities or causes.

If you choose to participate in the Albemarle Foundation, Albemarle Care Fund or any charitable or volunteer activities on your own, make sure to check with your supervisor before spending Company time or using any Company resources for these activities.

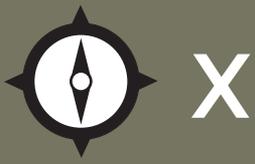




X

Code Governance & Administration





Code Governance & Administration

Ethics & Compliance Program Organization & Structure

Our Board of Directors is responsible for overseeing our Ethics and Compliance Program and has assigned oversight responsibilities to its designated committee. The Company has a Chief Compliance Officer who reports to the Chief Administrative Officer, and who regularly provides updates to the Board's designated committee. The Chief Compliance Officer is responsible for managing the Ethics and Compliance Program and coordinating with the General Counsel and other members of management in ensuring compliance with the Code, Company policies and applicable laws.

Code Administration & Interpretation

Each of us has immediate access to the most current Code of Conduct through the internal intranet site, as well as the Company's public Internet website: www.albemarle.com. Additionally, all new employees are directed to review the Code as part of the onboarding process. The Code is translated into several languages.

If questions or conflicts arise as to the meaning or application of the Code, the Chief Compliance Officer will be responsible for final interpretation and guidance.

Should any conflicts arise between this Code of Conduct and other corporate policies, the terms and conditions of this Code shall prevail. However, if local law prohibits application of any portion of this Code or other Company policies, the local law or regulation will be applied.

This Code of Conduct is not an employment contract and does not in any way change an employee's employment relationship with Albemarle.

Code Updates, Modifications & Waivers

As needs arise, this Code of Conduct may be updated as determined by the Chief Compliance Officer to address changes to the law or Company policies, or to provide additional guidance. The Chief Compliance Officer is responsible for initiating and approving changes to the Code. Material changes will be communicated throughout the organization using available communication channels.

The most recent version of the Code of Conduct can always be found on Albemarle's internal intranet site and at www.albemarle.com.

In the unlikely event that granting relief from any provision of the Code is in the best interests of Albemarle, any such modification or amendment of, or relief from the Code for any director or officer may only be made by Albemarle's Board of Directors and/or its designated committee. Such modifications, amendments or waivers will be promptly disclosed as required by law. Any questions concerning relief for all others must be referred to our Chief Compliance Officer.



XI

Frequently Asked Questions



Frequently Asked Questions

Purpose & Use of the Code

Q: *If I report something I believe to be a problem, will I get in trouble if my suspicion turns out to be wrong?*

A: If you have an honest and good faith concern, our Code prohibits any reprimand, discipline or retaliation against you for simply raising your concern. As an Albemarle employee, you have a responsibility to report suspected problems.

Q: *How does the Albemarle Integrity Helpline work?*

A: When you call the Integrity Helpline, a trained operator from a third party vendor will answer your call and ask you if you prefer to give your name or remain anonymous. Next, you will be asked a series of questions to gather as much information about your claim as possible. Then you will be given a report number which you can use to follow up on your report. You may call back at any time to find out the status of your claim and to provide additional information, if necessary.

Q: *If I report something, will I ever hear anything about the results of the investigation?*

A: We are committed to reviewing or investigating all reports of non-compliance. However, because we respect

confidentiality, we may not be able to share all of the details of the investigation with you, including any disciplinary action taken. If you make a report using the Integrity Helpline, you are responsible for following up on your claim, especially if you choose to remain anonymous. If we do not have your name, it is not possible for us to contact you.

Diversity & Equal Opportunity

Q: *I am a female employee. A male co-worker frequently makes suggestive comments about my appearance that make me uncomfortable. I've asked him to stop several times, but he won't. Is there anything I can do about this?*

A: Any form of harassing behavior is not consistent with our values and this Code. You should immediately contact your supervisor or Human Resources representative, or contact the Integrity Helpline at [IntegrityHelpline.Albemarle.com](https://www.albemarle.com/IntegrityHelpline). It is important that you speak up so that this behavior can be addressed quickly.

Q: *A co-worker keeps walking up to me while I'm trying to work and stands uncomfortably close to me. She tries to tell jokes but they aren't funny, and the jokes might even be offensive to some. Is this harassment?*

A: Harassment can take many forms, and people sometimes don't recognize that their comments or behavior are inappropriate in the workplace. To be considered harassment, the conduct must be "unwelcome." If you observe such behavior, you should tell your co-worker how you feel about her conduct and make her aware of your boundaries. If the conduct continues, you should talk to your supervisor or Human Resources representative for assistance.

Q: *I have recently been accused of being unfair in the hiring process. We are hiring for a regional sales position that requires frequent travel. I chose not to interview a candidate who told me she is a single parent because I didn't think she could handle the travel schedule. Was this wrong?*

A: Albemarle values diversity and is fully committed to being an equal opportunity employer. By not interviewing the candidate, you did not provide her with an equal opportunity to be considered based on her skills and you may not have made the best hiring decision for the Company. You should always speak with your Human Resources representative if you have questions about our employment policies.

Health & Safety in the Workplace

Q: *Lately, I've noticed that one of my co-workers looks like she is under the influence of drugs or alcohol — she is constantly drowsy and her speech seems slurred. Should I approach her to see if she's under the influence?*

A: A safe and secure work environment for our employees is very important to the Company. While you are right to be concerned you should immediately speak with a supervisor, a Human Resources representative or call the Integrity Helpline — especially if there is any immediate threat to anyone's safety.

Q: *I am a new employee at a plant location and am concerned that we are not following some safety procedures the way I used to at my old job. Since I am new here, I don't feel comfortable speaking up. What should I do?*

A: We encourage all employees to ask questions and make suggestions for change — especially when safety concerns

are at stake. You owe it to yourself, your co-workers, the Company and our customers to take immediate action if you think we are not living up to any important quality and safety commitments. You should start with your supervisor. If your supervisor doesn't address your concerns you should go to another member of management, your local Human Resources representative or call the Integrity Helpline.

Q: I overheard a co-worker threaten another employee during an argument. The other employee was upset but does not want to report the incident. I don't want to get involved; can I just ignore the situation?

A: No. All Albemarle employees have the right to be treated fairly and respectfully. It is never appropriate to ignore a violation of the law, Company policy or our Code. In this case, immediately tell your supervisor, another supervisor or call the Integrity Helpline. The safety and security of our employees are paramount and we will investigate all reported acts or threatened acts of violence.

Safeguarding Information & Assets

Q: Is it acceptable for me to discuss confidential information with my co-workers since we all work for the same company?

A: Albemarle employees are responsible for protecting Company information. Confidential means that the information must be kept secure and you should discuss such information only with those who have a need to know, including your co-workers. This means that in some circumstances you should not discuss confidential information with a co-worker because they may not need to know the information in order for them to do their job.

Q: I often read public message boards on the Internet about our Company and saw that someone posted a question asking about a significant project our Company has been rumored to be working on. The Company has not made an official announcement to the public, but I know we are working on the project. Can I respond on the message board and answer the question?

A: No. This is confidential, non-public information that must be protected at all times. It is against our Code and Company policy to publicly post or discuss any confidential or proprietary information on message boards, social networking sites, in chat rooms or in any other public forum. Improper disclosure of confidential information may also be a violation of the law. You should notify the Chief Compliance Officer or the General Counsel if you see such postings of confidential and/or material non-public information.

Q: I usually know the financial results before other people in the Company. It looks like we are going to have some very positive results to report. Would it be OK for me to buy Albemarle stock before reporting that we beat our forecasts and expectations?

A: No. There are many laws that govern when you can buy or sell stock. If the information that you have has not yet been shared with the public, and is important enough to possibly influence the way investors perceive the Company, then you should not buy or sell. In your situation, you should check with the General Counsel or the Chief Compliance Officer prior to buying or selling Company stock.

Our Business Relationships

Q: Couldn't we save the Company a lot of time and effort looking at various vendors and just hire my brother's office supply firm because I know that they can be trusted to provide us with the best products at a good price?

A: No. Hiring a firm simply because you trust your brother is not a sound business practice, and it disregards our purchasing policies. This also creates a conflict of interest between you wanting to financially help your brother and your objectivity in selecting the most viable supplier. However, if you properly disclose the situation to your supervisor, Human Resources representative or the Chief Compliance Officer, your brother's firm may be able to participate in the purchasing process without your influence over the decision.

Q: I would like to start an Internet business from home in my spare time. Is this a conflict of interest?

A: It is entirely appropriate to start a business of your own when you are not at work, but you should disclose the situation to your supervisor. It may be a conflict of interest if your business will compete against or sell products or services to Albemarle, or if spending time on the business might interfere with your capacity to perform your Albemarle duties. Additionally, you should not use Company resources in furtherance of your business. Your supervisor will work with you to resolve any potential conflicts that may arise in accordance with our Code and Albemarle policies.

Q: A vendor's sales rep offers you a designer pen, but says you can only have the pen if you put in a good word for him with the purchasing team. Since the cost of



the pen is probably not excessive, can you accept it?

A: No. Regardless of the cost of the pen, it is always inappropriate to accept or give a gift in a situation where there is a “quid pro quo” — an expression meaning “something for something.” In this case, he is offering you the pen only if he gets something in return and you should decline the offer.

Q: *I received what I think might be an “excessive” gift from a business partner in a country that traditionally provides frequent and expensive gifts. What should I do?*

A: Albemarle respects the cultures and traditions of all countries in which we do business. However, our policies do not allow giving or receiving gifts that could compromise — or even appear to compromise — our ability to make objective and fair business decisions. If you feel that you have received an inappropriate gift, you should discuss the situation with your supervisor or the Chief Compliance Officer who will assist you in determining the proper course of action. You may be required to turn the gift over to the Company or donate it to charity.

Q: *I just received an e-mail that included an attachment of a competitor’s business plan for the coming year. This is obviously confidential information but I didn’t do anything to get it, so can I keep it?*

A: No. We expect our employees to respect all confidential information, including our competitors’ information. Whoever sent you the information acted inappropriately and you may not read, copy or further distribute the document. You must notify the Albemarle Law Department immediately upon receipt so they can help you ensure that the situation is handled correctly.

Q: *While I was attending an industry conference, a sales manager for one of our competitors approached me with a hypothetical situation. He mentioned that if we were to avoid each other’s accounts, we could make more money more efficiently. What should I do?*

A: The competitor is likely trying to divide the market and allocate customers, which is illegal and may violate U.S. Antitrust and other competition laws. You should always reject any such type of proposal or conversation and then immediately call the Albemarle Law Department to seek further guidance.

Commitment to Financial Integrity

Q: *It is the last week in the quarter. My supervisor wants me to record a sale now that won’t be finalized until next week. Should I do what he says?*

A: Absolutely not. Your supervisor is not acting in accordance with our Code and Company policies. Costs and revenues must be recorded in the correct period. Until the sale is final, it would be a misrepresentation to include it in an earlier period. If you are not comfortable speaking with your supervisor about his/her request, speak with another supervisor, the Chief Compliance Officer or call the Integrity Helpline.

Doing Business Globally

Q: *We work with vendors in many countries where the businesses and organizations are run by the state. How do I know if the person I am dealing with is a government official?*

A: The terms “government official” or “representative” are defined very broadly. The best course of action is to always

assume that all employees of state-owned organizations or companies, and their agents, are government officials. If you are ever unsure, contact your supervisor, the Chief Compliance Officer or the Albemarle Law Department for guidance.

Q: *We are in discussions to provide product to a refinery which is privately held. The procurement manager indicated that if we give him a percentage of our revenue from this account, he’d award us the business. What should I do?*

A: Tell the person that you cannot make that promise yourself and that you’ll need to communicate with your supervisor on this issue. Then, immediately contact your supervisor and the Chief Compliance Officer and provide as much detail as you can about what transpired. The procurement officer solicited you for a bribe and that is something we will not do. Senior management will assist you in handling the matter.

Commitment to Our Communities

Q: *We use a contractor to dispose of waste and by-products. I am friends with the contractor’s crew chief and I get the feeling that they may not be following the proper disposal procedures according to what the law says. Should I be concerned about this?*

A: Yes. What the contractor is doing might result in liability for Albemarle. But, in addition to following the letter of the law, Albemarle cares about the environment. Improper waste disposal is inconsistent with our commitment to reduce the environmental impact of our activities. Doing things the right way means not looking the other way if you have any reason to think someone we contract with is doing something improper or illegal. You should speak with your supervisor or the Chief Compliance Officer or contact the Integrity Helpline about this situation.

Quick Reference Guide

Integrity Helpline — *just call or click.*

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 a reporter, 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, contact your HR Representative or Global Ethics & Compliance to report other issues.

Call the toll-free hotline at the following number **(800) 461-9330**. International numbers can be found at [IntegrityHelpline.Albemarle.com](https://www.albemarle.com/IntegrityHelpline).



