

PRINCIPLES

Chloride is committed to ensuring that its business is conducted in line with ethical, professional and legal standards, and the common values of integrity, honesty, fairness and transparency. Adherence to applicable local laws and regulations, Chloride policy, and the application of common sense, logic and the basic standards of behaviour expected in the societies in which the Company participates, should guide directors and employees in determining the correct course of action that supports these standards in their daily working lives.

This Code, while not exhaustive, is designed to provide guidance on personal professional conduct. A core principle is that neither Chloride's overall integrity nor its local reputation would be damaged if full details of a business practice or transaction were publicly disclosed.

The Code is approved by the Board of Directors and is supported by the Chief Executive, the directors and all levels of management.

The Board has ultimate responsibility for the Code and its application across Chloride's businesses worldwide. The Code is subject to annual review. Unresolved breaches of the Code can be referred to senior Group management under the Whistleblowing Policy. The process of communication and implementation of this Code of Ethics is managed by the Group's Company Secretary on behalf of the Board.

The Chief Executive and his leadership team actively support the Code. Day-to-day responsibility for compliance with the Code rests with all directors and employees.

The subject areas of the Code are:

- 1) Conflicts of Interest
- 2) Compliance with laws and regulations
- 3) Anti-Corruption
- 4) Protection of Confidential Information
- 5) Protection and proper use of Company assets
- 6) Relationships with partners, customers and suppliers
- 7) Environment, Health & Safety
- 8) Our employees
- 9) Political Contributions and Activities
- 10) Communities
- 11) Using the Code

CONFLICTS OF INTEREST

All directors, officers and employees should act in the best interests of Chloride and endeavour to avoid situations where personal interests could conflict, or appear to conflict, with the interests of Chloride companies. Chloride's reputation depends not only on high quality products and services but also on the manner in which relationships with those outside Chloride are conducted. Each employee must ensure that any conduct does not provide, or give the appearance of providing, personal gain at the expense of the Company or any external business contact.

As a general principle, gifts and entertainment may not be accepted without prior authorisation of an employee's line manager. Employees must not seek or accept from any person, company or organisation, or offer to any person, company or organisation, any gift, service, hospitality or favour that goes beyond reasonable accepted practice or common courtesies consistent with the local ethical business standards or where the acceptance or offering of such gift, service, hospitality or favour may be construed as seeking to procure an improper advantage.

Conflicts of interest can arise in many different ways, for example:

- Working in any capacity for another individual or entity whilst employed by a Chloride company which may materially impact the employee's ability to carry out his job function
- Competing (directly or indirectly) with Chloride for the purchase or sale of goods, services or other interests
- Having an interest in a transaction involving Chloride, a customer, supplier, vendor or lender
- Receiving a loan or guarantee of an obligation as a result of directing Chloride business to a supplier owned or managed by, or which employs, a close relative or friend
- Investments by employees and their close relatives in competitors, vendors, suppliers or customers unless they are publicly quoted companies
- Taking (or directing a third party to take) an advantage of a business opportunity through the use of corporate property, information or position

A conflict of interest can also arise where a line manager is in a personal relationship with a subordinate in their chain of command. The senior person in the relationship should disclose any such relationship to their immediate line manager. If the relationship is between work colleagues of different departments the employees concerned should consider whether there are any conflict circumstances and if so disclose the relationship to their respective line managers. Disclosure should also be made before seeking or accepting a promotion or transfer that would create such a conflict.

The rules on conflicts of interests are applicable to all Chloride employees and their connected persons (which includes family members such as spouse or civil partner, anyone living as a partner in 'an enduring family relationship', children and stepchildren and parents). Each employee must declare in writing to their supervisor or manager any potential conflicts of interest.

COMPLIANCE WITH LAWS, RULES AND REGULATIONS

In conducting business affairs, Chloride companies and their employees must observe the applicable laws, rules and regulations of each country in which they operate. Guidance and specific professional advice should be sought as appropriate.

Employees who are involved in the preparation of any information that will be included in any public communication to shareholders or investors or in any document or report that will be filed with the London Stock Exchanges or the UK Listing Authority must take all reasonable steps to ensure that such information is full, fair and timely.

Chloride believes in competing fairly and vigorously in its market sectors. Chloride does not engage in, nor is it party to, agreements, business practices or conduct that, as a matter of law, are anti-competitive.

Chloride seeks to uphold all internationally recognised human rights wherever its operations are located.

Chloride seeks to adhere to all relevant government guidelines designed to ensure that products are not incorporated into equipment used for the purposes of terrorism or abuse of human rights.

ANTI-CORRUPTION

Most countries have laws that prohibit corruption and bribery. Increasingly these laws will extend to payments to foreign entities or individuals outside these countries' own borders.

Therefore, the making or receiving of illegal payments or inducements or facilitation payments, such as bribes or any other form of corruption, are contrary to the policy of Chloride and any such act will be viewed as gross misconduct which will usually lead to the dismissal of employees involved. The funds and resources of Chloride shall not be used directly or indirectly for any purpose in connection with bribery or corruption.

No employee is expected to offer, give or receive bribes for the advancement of Chloride's business. Anyone responsible for punishment of, or reprisals against, employees in this situation will be subject to disciplinary action.

Any suspicion of bribery or corruption must be reported in the first instance to an employee's general manager, who should then refer it to the Group Risk Manager and the Company Secretary for investigation.

PROTECTION OF CONFIDENTIAL INFORMATION

No employee shall, without proper authority, access, modify, disclose (internally or externally) or make use of any trade secrets, confidential, commercial or personal information (including proprietary and confidential information, whether belonging to Chloride or others) for any purpose other than in the legitimate execution of their duties. The obligation of confidentiality extends after employees cease working for Chloride and covers disclosure to other parties.

PROTECTION AND PROPER USE OF COMPANY ASSETS

Company assets provide the foundation upon which to provide services and products worldwide. Chloride's employees must ensure proper and reasonable use and care of all Company assets, including physical property, intangible assets, IT equipment and communication resources.

RELATIONSHIPS WITH PARTNERS, CUSTOMERS AND SUPPLIERS

Chloride expects its employees to conduct themselves with the highest integrity in all their dealings at all times to safeguard the trust in which Chloride is held by its customers, shareholders, suppliers and other individuals and organisations with which our businesses interact. This helps to protect the investment of our shareholders.

No-one must represent themselves as an authorised agent for Chloride except in the proper performance of their duties, or where authorised to do so. Further, no-one must misuse their position or information acquired in the course of their duties for their own or others' personal gain.

No-one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information or misrepresentation of material facts and the treatment of customers and suppliers should be in accordance with ethical business practices at all times.

Chloride expects agents, suppliers and others working on its behalf to act lawfully and ethically, and in accordance with the values and standards set out in this Code. In particular, prospective agents and distributors are reviewed carefully prior to any appointment.

With the exception of trade press, no-one other than the Chief Executive or the Group Finance Director may disclose any information to the press or media without the express permission of the Chief Executive of Group Finance Director.

ENVIRONMENT, HEALTH & SAFETY

Chloride is committed to minimising the impact of its business on the environment and to safeguarding the health & safety of its employees and others affected by its activities by conducting its business in compliance with all applicable environment and workplace health and safety laws and regulations. It is

the responsibility of all directors, officers and employees to ensure, as far as is reasonably practicable, a safe and healthy work environment which avoids adversely impacting and causing injury to the environment and to all those with whom Chloride interacts.

These aims are more fully described in the Chloride Group PLC Environmental, Health and Safety Policy.

OUR EMPLOYEES

Employees should be treated, and treat each other, with respect, courtesy and decency. Disparagement or harassment of fellow employees or business contacts is inconsistent with these Chloride standards.

Chloride is committed to offering equal opportunities to all people without discrimination as to race, sex, nationality, ethnic or national origin, language, age, marital status, sexual orientation, religion or disability. The Company will not tolerate harassment in the workplace in any form.

Chloride hires and remunerates fairly with respect to skills, performance, competitors and local market conditions.

All employees are expected to:

- Demonstrate a positive commitment to the Company's values, aims and objectives
- Make themselves fully aware of the key accountabilities set out in their job specification/description/profile
- Display commitment to developing the skills necessary to carry out their work effectively
- Use their time effectively to fulfil Chloride's business objectives
- Carry out their duties in such a way to optimise Chloride's expenditure
- Work safely and follow the requirements of Chloride's Environmental, Health and Safety Policy
- Be responsible and accountable for all Chloride property and resources entrusted to them. Improper or careless use of Company materials or equipment may result in disciplinary action and/or the individual being charged for their replacement.

Chloride respects the rights of each employee to join or not join a trade union or other bona fide employee representative organisation.

Chloride believes in good communications with employees and in promoting consultation, co-operation and teamwork on matters of mutual concern.

POLITICAL CONTRIBUTIONS AND ACTIVITIES

No political donations shall be made by or on behalf of Chloride Group PLC or any other Chloride group company.

COMMUNITIES

In addition to the provision of employment opportunities and training and development activities, Chloride seeks to contribute to, and involve itself in, the local communities in which it operates. The Company makes charitable donations and supports its employees' charitable activities through matching.

USING THE CODE

The Code is applicable to all members of the Chloride Group of companies, and to all directors and employees within those companies. Where a Chloride company is a participant in any joint venture or commercial sharing arrangement Chloride seeks, as far as practicable, to ensure that the combined vehicle complies with our Code.

Employees who have concerns or queries in relation to the Code are encouraged to raise these with line management, or with the human resources or legal support staff, or by using the reporting process under the Whistleblowing Policy.

Failure by employees to observe the terms of this Code of Ethics may constitute a serious disciplinary offence and involve the termination of their employment.