



# THE RIGHT WAY. EVERY DAY.

Code of Conduct | Revised April 2025

PURIFY | PROTECT | ENHANCE





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# A MESSAGE FROM DAVE LI



**The Ingevity Code of Conduct highlights key principles and policies governing our actions in all that we do during our work for Ingevity. The Code sets out the rules that govern our conduct, outlines the standards of behavior expected as we do business, and guides us on how to raise concerns and where to go for additional help.**

**At Ingevity, how we work matters just as much as what we do.** Our Code of Conduct reflects our shared commitment to doing the right thing, consistently, and without compromise. It's a reflection of The IngeviWay and the values that define us: integrity, safety, sustainability, a respect for people and a drive to serve our customers with excellence.

We've built a strong reputation by acting ethically and responsibly, and we each play a role in protecting that. This Code isn't just a policy document—it's a resource to help guide our decisions, navigate challenges and reinforce the trust we've earned with each other and those we do business with.

I encourage you to read it, understand it and use it. If something doesn't feel right, speak up, whether to your manager, HR Business Partner, Law and Compliance or through our Ethics Line. The entire leadership team is here to support you.

Our culture is one of our greatest strengths, and it's shaped by the choices we make every day. Thanks for holding yourself, and each other, to the highest standards.

A handwritten signature in black ink, appearing to read 'D Li', on a white background.

Dave Li  
Chief Executive Officer



# THE INGEVIWAY

## **WHY WE'RE HERE**

We're here to improve the world through innovations that purify, protect and enhance.

## **WHO WE ARE**

We're bold, energetic, ingenious and genuine.

## **WHAT WE WANT TO BE**

We want to be the recognized leader in our markets, proud of where we work and a positive influence in our communities.

## **WHAT'S IMPORTANT TO US**

### **Safety and Sustainability**

We strive for zero personal and process safety incidents. We continually seek to protect human health, the environment and our communities. We use resources responsibly and encourage responsible application of our products.

### **People**

Our success requires a team-oriented culture that engages the diversity, knowledge, energy, talents and expertise of all individuals. We treat each other fairly and respectfully, seek to develop our skills and talents, and reward results.

### **Commitment to Excellence**

We strive to perform at the highest level. We work to continuously improve our operations, businesses and results. To this end, each employee is accountable for delivering on their commitments.

### **Customers**

We strive to be our customers' technology partner of choice. We want to anticipate their needs and exceed their expectations. We create the most value for ourselves when we create value for our customers.

### **Integrity and Ethical Behavior**

We are honest, sincere and genuine. We always do the right thing. We obey the letter and spirit of the laws in the countries where we do business.

### **Creativity and Innovation**

We're innately curious and open to new ideas. We are always willing to be bold and take informed risks. We view failure as an opportunity to learn.

# WE DO THINGS THE RIGHT WAY, EVERY DAY



At Ingevity, we believe each one of us plays a central role in always doing things the right way. Our purpose to purify, protect and enhance the world is at the core of all we do. We focus on positively impacting our planet and people, and how we deliver value to stakeholders.

This is demonstrated by our behaviors, interactions and business transactions, every day, in everything we do.

- We respect and protect people and the environment.
- We act fairly and with integrity in the marketplace.
- We behave ethically in our business activities.
- We safeguard our assets and resources.
- We positively impact our communities and the world.



## WHY DO WE HAVE A CODE OF CONDUCT?

### **INTEGRITY AND ETHICAL BEHAVIOR. SAFETY AND SUSTAINABILITY. PEOPLE. COMMITMENT TO EXCELLENCE.**

These values—as well as the other elements of The IngevityWay—shape every action we take as Ingevity employees, officers and directors around the world. Unwavering adherence to the highest ethical standards is crucial to our success. It means taking the right course of action wherever, whenever we do business.

We all play an integral role in ensuring Ingevity is a leader in our industry and continues to be a successful, sustainable and well-respected company by ensuring we follow our Code, as well as the requirements in our policies, standards and procedures, and all applicable laws and regulations.

We strive to ensure we are always **doing things the right way**, through strong relationships and trust within the company and with our contractors, suppliers, customers, shareholders, communities and other stakeholders.

## WHO IS RESPONSIBLE FOR COMPLYING WITH OUR CODE?

This Code applies to Ingevity Corporation, all Ingevity-controlled entities and their respective employees, officers and directors (collectively referred to as “Ingevity team members” or individually as an “Ingevity team member”). Ingevity team members are required to read, understand and follow this Code. No Ingevity team member may ask anyone to engage in activities that violate this Code. Third parties acting on behalf of Ingevity are also required to understand and adhere to the requirements in this Code when working with or for us. Upon request, all Ingevity team members and third parties acting on behalf of Ingevity are required to certify that they are familiar with this Code, and that they are not aware of any violations of this Code.



### **What are my responsibilities as an Ingevity team member?**

Each Ingevity team member must:

- Thoroughly read, understand and adhere to requirements in this Code, as well as company policies, standards and procedures (“Ingevity Policies”) and laws and regulations (“Applicable Law”) that apply to your work and location(s);
- Help others comply with this Code;
- Complete all required training in a timely manner; and
- Ask questions and speak up if you are not sure about your responsibilities or whether you or others are doing the right things.

### **What are my responsibilities as a leader at Ingevity?**

In addition to adhering to all requirements set forth in this Code, executives, directors, managers and supervisors at Ingevity (“Ingevity Leaders”) have a special responsibility for ensuring this Code is followed and that we, as a company, act with the highest levels of integrity and ethical behavior.

Ingevity Leaders must:

- Never disregard the principles set forth in this Code in order to secure a business advantage;
- Lead by example through actions and words when interacting with Ingevity team members and third parties;
- Ensure that the importance of following this Code is communicated to Ingevity team members;
- Stay closely connected with Ingevity team members to reinforce expectations, ensure they are comfortable sharing questions or concerns and respond to any questions or concerns they raise;
- Help others make the right choices and seek additional help if needed;
- Never retaliate against an Ingevity team member who makes a good faith report of a suspected violation of this Code, Ingevity Policies or Applicable Law, or prohibit any other Ingevity team member from engaging in any type of retaliation;
- Recognize positive contributions when Ingevity team members and others are doing the right things; and
- Immediately report any known or suspected violation of this Code, Ingevity Policies or Applicable Law as described in the Seeking Guidance, Speaking Up and Reporting Section of this Code.

### **If I think I am facing an ethical dilemma, what should I do?**

You must stop and evaluate the situation by asking yourself questions, such as the following, before proceeding:

- Is this the right thing to do? Is this activity legal under Applicable Law?
- Is this activity permitted by The IngeviWay values, this Code or Ingevity Policies?
- Am I putting myself, others, or Ingevity’s reputation at risk?
- Would I feel comfortable if others, such as my supervisor, co-workers, family, the media, or the public, became aware of my actions?

If you answer “no” to any of the above questions, you should not proceed with the activity.

This Code cannot cover every situation that you may face. You are expected to apply common sense and act in a manner consistent with this Code, Ingevity Policies and Applicable Law if you encounter situations not covered in this Code. It is critical that we make the right decisions any time we face an actual or potential ethical dilemma. If you are ever unsure about how to handle a situation, stop and seek help from your manager, your Human Resources Business Partner or Law and Compliance, as detailed in the Seeking Guidance, Speaking Up and Reporting Section.

### **If someone raises a concern to me, in my role as an Ingevity Leader, what should I do?**

Contact one of the resources identified in the Seeking Guidance, Speaking Up and Reporting Section. You should not attempt to investigate an ethics or compliance concern without prior approval from Human Resources or Law and Compliance.

## SEEKING GUIDANCE, SPEAKING UP AND REPORTING

Workplace ethical dilemmas that you may face can be complicated. Applicable Law is often complex, varies in different locations and is subject to change. If you have questions about your responsibilities or applicable requirements, or if you have concerns about whether you or others are doing the right thing, speak up by contacting your manager, your Human Resources Business Partner, Law and Compliance, or by using methods described below. When in doubt, please seek help.

Your direct manager is usually the best person to speak with first since they know your role and responsibilities and those of others on your team. Your manager is the best resource for questions or concerns related to location or job-specific procedures, issues with co-workers, engagement or morale, compensation, benefits, staffing, community relations and similar issues. If your concern involves your manager or if you are uncomfortable reporting to your manager for any reason, use any of the available resources listed below to voice your concerns.

Prompt reporting will enable Ingevity to address the matter and allow us to avoid or mitigate damages related to a violation. In addition, certain types of violations are required by Applicable Law to be reported and withholding knowledge of such violations may be illegal.

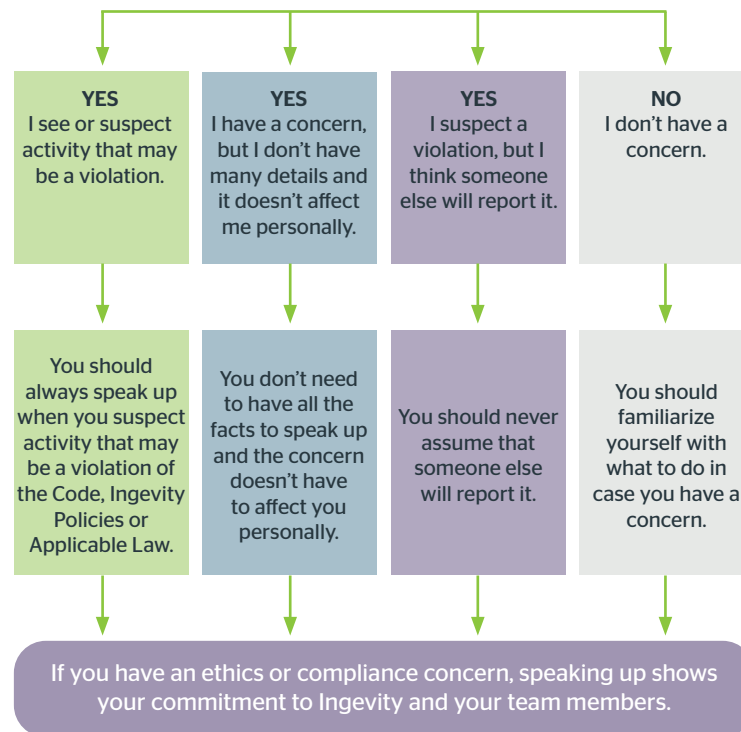
### OTHER OPTIONS TO SPEAK UP AND REPORT INCLUDE:

- Speaking with your Human Resources Business Partner;
- Speaking with a member of Law and Compliance;
- Speaking with a representative on Ingevity's Ethics Line, which is run by an independent company, by calling +1-855-832-7270 or the number for your country listed in the Ethics Line Dialing Instructions;
- Reporting online at [www.ingevity.ethicspoint.com](http://www.ingevity.ethicspoint.com);
- Emailing information to [ethics@ingevity.com](mailto:ethics@ingevity.com);
- Mailing information to Ingevity Ethics Line, 4920 O'Hear Avenue, Suite 400, North Charleston, SC 29405 (Note: We request that you do not use this method if your concern involves any violation that may need to be resolved immediately.);
- Reporting concerns related to financial matters, internal controls, or members of Ingevity's Executive Team to the Chair of the Audit Committee of Ingevity's Board of Directors (the "Audit Committee") by emailing [auditchair@ingevity.com](mailto:auditchair@ingevity.com); or
- Scanning the QR code to the right on your mobile device and follow the instructions for making a report.

## SPEAK UP!

You should never hesitate to seek help. If you see or suspect activity that may be a violation of the Code, Ingevity Policies or Applicable Law, speak up.

### DO YOU HAVE AN ETHICS OR COMPLIANCE CONCERN?



[INGEVITY.ETHICSPPOINT.COM](http://INGEVITY.ETHICSPPOINT.COM)



### **Can I make an anonymous report?**

Yes. Ingevity recognizes that there may be circumstances in which you are not comfortable reporting the issue. In this situation, you may report anonymously using Ingevity's Ethics Line, online or through email, mail or as detailed in the Seeking Guidance, Speaking Up and Reporting Section of this Code.

### **Can my report be kept confidential?**

Yes. If you provide your identity when making a report, Ingevity (to the extent permitted by Applicable Law and consistent with fair and uniform enforcement of this Code) will endeavor to keep your identity confidential. Ingevity will share the information received only with those who have a need to know.

### **Will I face repercussions if I report an ethical violation or concern?**

No. Ingevity prohibits retaliating against any Ingevity team member who makes a good faith report of a violation of this Code, Ingevity Policies or Applicable Law. A "good faith report" means that you reasonably believe the report to be true and you have disclosed everything you know about the violation. If you believe you have been the subject of retaliation, you should report it immediately.

The making of false reports is unacceptable, may be unlawful and could subject the reporting person to disciplinary action, up to and including termination of employment.

### **What should I do if my manager or another Ingevity Leader asks me to do something that could violate our Code, Ingevity Policies or Applicable Law?**

You should first speak with your manager or the Ingevity Leader about your concerns in an honest and respectful manner. If you are not comfortable speaking to your manager or the Ingevity Leader or you are concerned about whether your manager or the Ingevity Leader will respond properly to your concerns, promptly report the situation using one of the methods described above. No Ingevity team member or third party acting on behalf of Ingevity is permitted or has authority to violate, or to direct another Ingevity team member or any other person to violate this Code, Ingevity Policies or Applicable Law.

## INVESTIGATING ALLEGATIONS

Authorized Ingevity team members will investigate allegations promptly and thoroughly as appropriate in accordance with the Ethics Reporting and Ethics Investigation Policies. Timely investigations are important to ensure we prevent or minimize harm. Depending on the nature of the investigation, internal or external legal counsel may also be involved.

The investigator will act objectively and respectfully when interviewing those who have knowledge of the alleged violation or issue. Relevant documents and other evidence will be collected and reviewed. After the investigation is completed, the investigator or other authorized Ingevity team members will determine what, if any, corrective actions are recommended and will assist in implementing such actions. Corrective actions for failure to comply with this Code, Ingevity Policies, or Applicable Laws may result in disciplinary action up to and including termination of employment, as appropriate. The individual reporting the complaint will be notified, if known, when the investigation has been completed.

All Ingevity team members and third parties acting on behalf of Ingevity must cooperate fully and honestly during an investigation whether it is led by Ingevity, a government agency, or a third party engaged by Ingevity. Ingevity team members who fail to cooperate with or who obstruct these investigations, are subject to investigation which may result in disciplinary action. Each person involved in the investigation should not discuss the details or status of the investigation with any other person (whether at Ingevity or otherwise) unless authorized to do so by the investigator.

Investigation findings and recommendations are reviewed periodically with the Ingevity Executive Team and the Audit Committee of the Board.

**For more information for employees, please refer to our Ethics Reporting Policy.**

## RETALIATION AND DISCIPLINARY ACTION

Ingevity is committed to protecting the rights of those individuals who ask questions or report issues or concerns in good faith.

Ingevity does not tolerate threats, intimidation or any type of retaliation against anyone who in good faith:

- Reports an actual or potential violation of our Code, Ingevity Policies or Applicable Law;
- Raises a question or concern about an ethical or compliance matter; or
- Cooperates in an investigation.

### **What should I do if I believe I am being treated differently because I reported a violation or concern?**

All allegations of retaliation will be investigated as serious matters. Individuals involved in retaliation will be subject to disciplinary measures, up to and including termination of employment, as appropriate.

**Question:** My co-worker called the Ethics Line and reported an incident that our manager was involved in where she wasn't ethical. After that, our manager has been treating my co-worker poorly and he is afraid to make another report. What should I do? I don't want to be treated the way my co-worker is being treated since calling the Ethics Line about our manager's bad behavior.

**Answer:** You should report this situation to your Human Resources Business Partner or as detailed in the Seeking Guidance, Speaking Up and Reporting Section of this Code so an investigation can be completed. You and your co-worker must never be subject to retaliation for reporting an issue in good faith.

# WE RESPECT AND PROTECT PEOPLE AND THE ENVIRONMENT

Ingevity is committed to advancing diversity, equity and inclusion, ensuring equal employment opportunity, and respecting the dignity and human rights of all people. We are committed to protecting people and the environment while using resources in a responsible and sustainable manner.



## DIVERSITY, EQUITY, INCLUSION AND BELONGING

Ingevity strives to create an inclusive workplace that allows Ingevity team members to learn, grow and contribute, and provide opportunities for Ingevity team members to realize their full potential.

- We recruit, develop and empower a diverse global team with a variety of capabilities, knowledge, experiences and perspectives that combine to generate a strategic competitive advantage.
- We strive to build a culture that fosters trust where all Ingevity team members have a sense of belonging, are encouraged to speak openly and honestly and are empathetically heard.
- We focus on providing every Ingevity team member with the chance to thrive and succeed by elevating equity and embedding fairness at each stage of employment.

For more information for employees, please refer to our [Diversity, Equity, Inclusion and Belonging site](#).



**HISPANIC ORIGIN AND LATINO AMERICAN  
(HOLA!) EMPLOYEE RESOURCE GROUP**



**VISIONS OF INGEVITY'S BLACK EXCELLENCE  
(VIBE) EMPLOYEE RESOURCE GROUP**



**INGEVITY WOMEN'S NETWORK  
(IWN) EMPLOYEE RESOURCE GROUP**

## ANTI-DISCRIMINATION AND ANTI-HARASSMENT

At Ingevity, we all play a role in creating a work environment where everyone contributes without experiencing discrimination or harassment and is respected as a valuable Ingevity team member.

- Ingevity strives to ensure everyone has equal employment opportunities that enable us to grow and develop based on talents and abilities, and employment decisions and practices are administered without regard to protected characteristics such as race, color, age, gender, sexual orientation, religion, national origin, ethnicity, disability, certain medical conditions including pregnancy, military or veteran status, or other protected statuses by Applicable Law.
- Ingevity strictly prohibits discrimination based on protected characteristics when recruiting, hiring, training and developing Ingevity team members, promoting or compensating Ingevity team members or disciplining or making decisions regarding Ingevity team member retention.
- Ingevity makes employment decisions based on skills and qualifications to do a job, results of performance assessments and other appropriate factors.

### What is harassment?

Harassment includes a wide range of unwelcome sexually directed behavior or other unwelcome conduct that is severe or pervasive in nature, and is based on an individual's legally protected characteristic. Harassment can include, but is not limited to:

- Unwanted attention or advances, sexual comments or jokes, requests for sexual favors, viewing or displaying pornographic materials;
- Use of offensive or disrespectful language, slurs, inappropriate humor or entertainment, inappropriate or offensive body language or visual displays; or
- Non-inclusive, bullying, intimidating, threatening, hostile or violent behavior.

Ingevity is committed to maintaining a work environment where harassment of any kind is not tolerated and not engaged in by anyone at any Ingevity location. In addition to being prohibited at Ingevity, some types of harassment are also illegal.

Any Ingevity team member that engages or threatens to engage in any harassment, threatening behavior or violence in the workplace will be subject to disciplinary action, up to and including termination of employment.

**Question:** I've been receiving non-work-related emails and texts from another Ingevity team member, and I've asked the team member to stop several times because the emails make me uncomfortable, and I don't want to have this type of interaction with this employee. Is this harassment?

**Answer:** Yes, if you've asked this Ingevity team member to stop sending you these non-work related emails and texts and they continue to send them, this may be harassment and must be reported as detailed in the Seeking Guidance, Speaking Up and Reporting Section of this Code so an investigation can be initiated and appropriate corrective measures implemented.

**For more information for employees, please refer to our Anti-Harassment Policy, Equal Employment Opportunity and Non-Discrimination Policy and Policy Against Workplace Violence.**

## HUMAN RIGHTS



Ingevity supports the **Ten Principles of the United Nations Global Compact** on human rights, labor, environment and anti-corruption and is committed to respecting and protecting human rights and complying with all Applicable Law in our operations. We expect our suppliers and commercial partners across our supply chain to also respect and protect human rights.

- We provide fair and equitable wages, benefits, and reasonable working hours in accordance with Applicable Law.
- We strictly prohibit forced labor, child labor and human trafficking.
- We recognize Ingevity team members' right to freedom of association and assembly and the right to collective bargaining consistent with Applicable Law.
- You must promptly report issues involving diversity, equity and inclusion, discrimination, harassment or a human rights abuse involving yourself or others as detailed in the Seeking Guidance, Speaking Up and Reporting Section of this Code. Do not assume that others have already reported the issue.

For more information, please refer to our Human Rights Policy on [ingevity.com](https://www.ingevity.com).

## SAFETY, HEALTH AND ENVIRONMENT (SHE)

At Ingevity, we continue to build on our heritage of developing technologies that make the air we breathe cleaner, the roads we drive on safer and smoother, plastics biodegrade faster, and crops grow healthier and fuller.

- We are dedicated to operating our businesses and manufacturing locations in full compliance with all Safety, Health and Environment (“SHE”) requirements in our Code, Ingevity Policies and Applicable Law.
- We strive to eliminate or reduce SHE risks associated with our operations and products. We have strong SHE programs in place to minimize and manage existing risks. We maintain processes to thoroughly assess SHE risks before starting new activities or projects, developing or selling new products, engaging new third party providers or completing any merger and acquisition activities.
- We support the principles of the American Chemistry Council’s Responsible Care® Program and expect our contractors, suppliers, customers and other third parties to support the commitments outlined in Ingevity’s Responsible Care Policy.

**For more information for employees, please refer to our Safety, Health and Environment (SHE) Policy.**



### RESPONSIBLE CARE® POLICY

**Ingevity is committed to protecting human health and the environment while utilizing resources in a responsible and sustainable manner. To support our commitment, all levels of our organization will work to:**

- Create a secure workplace free from occupational injuries and illnesses, process safety events, and environmental incidents through safe operations and processes.
- Maintain standards to meet or exceed all relevant safety, health, environmental, and security laws, regulations and other applicable requirements.
- Assess the hazards and risks associated with our products and operations and effectively communicate to all interested parties.
- Continuously improve our Responsible Care® Management System to enhance our safety, health, environmental, security, and Responsible Care® performance, including product safety, process safety and pollution prevention activities.
- Ensure that timely and effective corrective action is taken for all safety, security or environmental incidents associated with our operations or products.
- Integrate safety, health, environmental, security and Responsible Care® targets and objectives into our annual goal setting and review processes.
- Openly and effectively respond to the concerns of interested parties.
- Adhere to the Guiding Principles of Responsible Care® as we lead our Company in ethical ways that increasingly benefit society, the economy, and our surroundings.



## PERSONAL AND PROCESS SAFETY

Ingevity is committed to preventing injuries and significant safety incidents.

- Ingevity team members work together to protect co-workers, contractors and the communities where we operate from injuries, occupational illnesses and significant safety incidents through the design of safe operations, strong safety culture and focus on continuous improvement of personal and process safety management systems and performance.
- You must understand and comply fully with the Life Saving Rules detailed below that apply to your work to prevent fatalities and significant injuries. We understand that we all have a central role in safety to keep ourselves and our co-workers safe.
- You must immediately report any injury, illness, near miss incident, unsafe act or unsafe work condition to your manager, another Ingevity Leader or SHE representative so investigations can be promptly completed and appropriate corrective measures implemented.



### What types of SHE incidents am I required to report?

In addition to any work-related injuries and illnesses, examples of incidents, with actual or potential consequences, that must be reported by Ingevity team members and third parties who are on site at Ingevity locations include, but are not limited to:

- Process releases, upsets, activation of hazard-control systems or safety protective devices;
- Any type of fire or smoldering event;
- Exposure to hazardous materials, energy or unsafe conditions;
- Environmental impacts (spills, leaks, odors, excessive waste, etc.), permit exceedances;
- Poor housekeeping and/or waste management issues;
- Property or equipment damage or malfunctioning equipment;
- Noncompliance with our Code, Ingevity Policies or Applicable Law;
- Unfavorable impacts on or complaints from the public;
- Product safety or distribution impacts;
- Motor vehicle incidents while driving an Ingevity vehicle or driving on Ingevity business; and
- Any other work you are involved in or aware of that may be unsafe for you or others to perform.

**Question:** I am training as an operator and my trainer told me to skip several steps on the checklist for the task he was training me on. He said there was a quicker way to get the job done and I didn't need to strictly follow the checklist. What should I do?

**Answer:** It is very important that checklists, as well as procedures, be followed carefully and no steps be skipped. Not following checklists and procedures or taking other types of shortcuts can potentially lead to injuries and incidents that could be serious. You must report this situation immediately as detailed in the Seeking Guidance, Speaking Up and Reporting Section of this Code.

**For more information for employees, please refer to our SHE Incident Investigation Standard. For employee access to additional personal and process safety standards, click [here](#).**

## **HEALTH AND WELLNESS**

Ingevity provides access to medical professionals to assist with work-related injuries and illnesses. Mental Health First Aid providers are available at many of our locations and Employee Assistance Program representatives are also available to assist with mental health issues. Ingevity team members are encouraged to seek help, if needed, for any physical or mental health issues that may impact their ability to work safely.

Ingevity protects the privacy of Ingevity team members' health-related information.

## **ALCOHOL AND DRUG ABUSE**

We have an obligation to each other to work safely. To ensure a safe work environment, Ingevity seeks to maintain a workplace free from individuals whose decision-making capabilities are impaired.

- Ingevity team members must not possess, distribute, use or be under the influence of illegal drugs, prescription drugs obtained illegally or used in an abusive manner, or other substances abused for the purpose of achieving a state of mental impairment, while on Ingevity time, at any Ingevity locations, while off-site on company business or when driving on company business.
- Ingevity team members must not be under the influence of alcohol (subject to limited exceptions in the Substance Abuse Policy), prescription or illegal drugs, or over-the-counter medicine that may reduce safety or negatively affect work performance while on Ingevity time, at any Ingevity locations, while off-site on company business or when driving on company business.
- Ingevity team members must report use of prescribed narcotics or other medications that may negatively impact the ability to perform work safely or effectively to their manager, another Ingevity Leader or Human Resources Business Partner so alternative work arrangements can be made, if necessary.
- Third parties who work at Ingevity locations must not engage in activities described above while on Ingevity property and must follow their companies' policies regarding reporting use of substances that may impair their ability to perform work safely or effectively.

Ingevity reserves the right to conduct testing for cause or on a random basis in accordance with our Substance Abuse Policy or Applicable Law.



**Question:** I found a bottle of pills on the floor outside my work area that doesn't have a prescription label on it. I think this may belong to my co-worker who has been behaving very oddly at work recently. I don't want to get her in trouble so am not sure what to do?

**Answer:** If a co-worker is taking drugs that were not legally prescribed or prescribed narcotics or other substances, they may be impaired while at work which could lead to injuries or incidents. You must report this situation immediately as detailed in the Seeking Guidance, Speaking Up and Reporting Section of this Code.

**For more information for employees, please refer to our Substance Abuse Policy and our occupational health standards.**

## **ENVIRONMENT**

Ingevity is an industry leader in adding value to products made from renewable materials and in derivatizing technologies that impart desirable environmental benefits in their use.

- We work to assess and reduce environmental impacts from existing operations, planned projects and potential acquisitions, including, but not limited to, air and greenhouse gas emissions, energy use, water management, and solid waste generation, and increasing beneficial reuse wherever possible.
- We obtain all necessary permits, licenses, and registrations prior to construction and operation of new equipment.
- You must immediately report actual and suspected environmental problems or non-compliance issues to your manager, SHE representative and Law and Compliance, as appropriate. Immediate reporting is critical since managers must take rapid remedial action and some incidents must be quickly reported to government agencies.

**For more information for employees, please refer to our environmental policies and standards.**



## PRODUCT SAFETY AND STEWARDSHIP

Many of Ingevity's products are bio-based, developed to be safe for their intended uses and bring considerable value to our customers and consumers worldwide.

- We continually assess and strive to improve our products to minimize impacts and maximize quality throughout their lifecycle: design, development, procurement, production, delivery, use, customer support and ultimate reuse, recycling or disposal in support of our commitment to sustainability.
- We comply with requirements associated with our ISO9001 and IATF16949 product quality certifications, product quality procedures and Good Manufacturing Practices at our sites, as applicable to our processes and products.
- We strive to provide our team members and customers with accurate and thorough information concerning the safe handling of our products. We label and promote our products in an honest and ethical manner.
- You must promptly report product safety, quality or compliance concerns as detailed in the Seeking Guidance, Speaking Up and Reporting Section of this Code.

**For more information for employees, please refer to our Product Stewardship Policy, Product Stewardship and Regulatory site, and Corporate Quality Policy and Quality Manual.**



# WE ACT FAIRLY AND WITH INTEGRITY IN THE MARKETPLACE

We seek to conduct our business fairly and honestly and avoid any action that might call into question the honesty and fair dealing of Ingevity or Ingevity team members.



## INTERACTIONS WITH OUR CUSTOMERS, SUPPLIERS AND OTHER THIRD PARTIES

Our business partners are integral to the success of Ingevity and we build relationships based on trust and respect.

- We seek to understand our customers' requirements and collaborate to create innovative solutions that solve the complex challenges of our customers and markets to deliver beneficial products.
- We meet our commitments to customers and promptly address any concerns raised.
- We expect that third parties acting on behalf of Ingevity are aligned with the concepts in this Code and suppliers adhere to our Supplier Principles of Conduct.
- We do not condone or do business with suppliers or other third parties that violate requirements in this Code and Supplier Principles of Conduct.
- You must promptly report issues or concerns related to interactions with customers, suppliers or other third parties as detailed in the Seeking Guidance, Speaking Up and Reporting Section of this Code.

**For more information, please refer to our Supplier Principles of Conduct on [ingevity.com](https://www.ingevity.com). For employees, additional policies and procedures are available in our Policy Library.**



## ANTITRUST AND FAIR COMPETITION

At Ingevity, we believe in doing business honestly and transparently and require strict compliance with global competition and Applicable Law prohibiting unfair and deceptive trade acts and practices. We participate in the marketplace fairly and lawfully, and we prohibit activities that reduce competition and restrict trade.

- Ingevity seeks to ensure that it competes legally in activities related to keeping and growing our business.
- You must use good faith efforts to deal fairly with customers, suppliers and competitors, and not take unfair advantage of anyone through manipulation, concealment, unauthorized use of confidential information, misrepresentation of material facts, or any other unfair business practice.
- You are prohibited from entering into verbal or written understandings or agreements with competitors that interfere, or may be perceived to interfere, with fair trade and competition, including without limitation:
  - Fixing or controlling price;
  - Limiting production or capacity;
  - Allocating markets, customers or territories;
  - Agreeing to boycott or refuse to deal with third parties; and
  - Rigging bids.
- You must only obtain competitive intelligence in an appropriate and lawful manner, and must not gather or accept competitive intelligence from competitors or from third parties if you know or suspect they are not authorized to provide it.
- You must seek to avoid contact or communication with competitors that could be perceived as collusion, and must not share confidential or competitive business information with competitors or other third parties before consulting with Law and Compliance.
- You must not use public communications to inappropriately disclose information to or otherwise illegally coordinate with competitors.
- You must consult with Law and Compliance to ensure all activities involving potential antitrust or fair competition issues are in compliance with Applicable Law and Ingevity Policies.



**Question:** If a customer provides me with valuable information about a close competitor, am I able to use any of this information?

**Answer:** If the information is obtained lawfully, you may receive information about competitors from customers, analysts, consultants, or published sources. You must always document your sources of competitive intelligence to avoid questions of unlawful exchange.

**For more information for employees, please refer to our Antitrust and Competition Policy.**

## **TRADE ASSOCIATIONS AND INDUSTRY GROUPS**

Participation in trade associations and industry groups could present risks of unlawful collusion or other antitrust and fair competition issues since opportunities for communication among competitors exist.

- You must obtain approval from Law and Compliance before joining any new trade association or industry groups.
- Ingevity team members must not participate in nor remain present during any discussion among competitors involving improper agreements, restriction of competition or fair trade in any manner, or sharing of competitive or sensitive business information.
- Improper discussions an Ingevity team member becomes aware of must be promptly reported to Law and Compliance so that appropriate action can be taken.

**Question:** If I am at an industry association meeting and a competitor begins to have a price discussion, how should I react?

**Answer:** You should speak up and request that pricing not be discussed. If the discussion continues over your objection, request that your objection be noted in the meeting minutes, leave, and report the incident immediately to Law and Compliance.

**For more information for employees, please refer to the Trade Association section in our Antitrust and Competition Policy.**



## GIFTS MEALS AND ENTERTAINMENT

At Ingevity, it is common business courtesy to give or accept occasional, appropriate business gifts, meals and entertainment to foster business relationships, friendship and trust.

- All gifts, meals and entertainment offered or received must be modest in scope and value and for a legitimate business purpose. All associated expenses must be properly recorded and reported.
- You must not give, receive, ask for or promise any kind of business advantage, favor, or decision in exchange for gifts, meals or entertainment.
- All gifts, meals and entertainment above the value established in Ingevity's Gifts, Meals and Entertainment Policy must be promptly reported to your manager.
- All gifts, meals and entertainment provided by an Ingevity team member must be aligned with Ingevity's Policies and the policies of the recipient's company, as well as consistent with local business customs and practices and Applicable Law.
- Gifts, entertainment and payment of travel and lodging involving government officials (including employees of state-owned enterprises) may be permitted in strictly limited circumstances with prior approval from Law and Compliance. Any permitted gift or entertainment must have a clear business purpose and must not be used in any way to improperly influence (or appear to improperly influence) any decision by a government official.
- All cash or cash equivalent gifts to or from an Ingevity team member must be pre-approved by Law and Compliance.
- You must consult with Law and Compliance on any questions regarding whether a gift, meal or entertainment is appropriate.

**Question:** My co-worker has a new mobile phone and is telling everyone it was a gift from her spouse. I know she received this phone from a supplier and it's an expensive gift. What should I do?

**Answer:** Gifts that are higher in value than the limit must be reported to Law and Compliance using our disclosure form. You should report this situation to your Human Resources Business Partner, Law and Compliance or as detailed in the Seeking Guidance, Speaking Up and Reporting Section in this Code so an investigation can be completed and appropriate corrective measures implemented.

**For more information for employees, please refer to our Gifts, Meals and Entertainment Policy and Gifts, Entertainment, Travel for Government Official Policies.**



## ANTI-BRIBERY AND ANTI-CORRUPTION

Ingevity conducts business in compliance with all Applicable Law addressing anti-bribery and anti-corruption.

### What can be considered bribery or corruption?

In general, bribery is the giving of money or anything else of value in an attempt to unlawfully influence the action of another. Bribes and corruption can take many forms which may include: money, gifts, kickbacks, rebates, refunds, loans, fees, hospitality, tax evasion, payments to government officials (including employees of state-owned enterprises) to expedite action, favors, services, discounts, travel, employment offers, charitable contributions, award of a contract or any other advantage or benefit.

Participation in any form of bribery and corruption, whether by Ingevity team members or third parties acting on Ingevity's behalf, is prohibited, regardless of local practices.

- You must never offer, accept or request bribes, personal payments or anything of value to improperly influence or gain improper business advantage or favorable treatment.
- We conduct appropriate due diligence before engaging third-party agents, distributors, and other third parties conducting business or performing services on behalf of Ingevity, and require that they comply with anti-bribery and anti-corruption laws.
- We closely monitor activities of third-party agents and distributors acting on behalf of Ingevity for any warning signs, and require them to certify compliance with our anti-corruption expectations.
- You must immediately report any suspicious or illegal behavior involving bribery or corruption by an Ingevity team member or third party acting on Ingevity's behalf as detailed in the Seeking Guidance, Speaking Up and Reporting Section of this Code and discontinue conducting business with third parties that are suspected of or have engaged in corrupt behavior.

**Question:** I neglected to obtain a business license needed to complete a transaction and the local government agency does not allow payment for expedited services. An agency representative said he could help me get the license quickly if I paid him \$25 US currency. Can I pay this since I really need to complete this transaction and it is a small amount of money that he requested?

**Answer:** No, you may not give any amount of cash, or anything else that may be considered a bribe or facilitating payment, to a government official to receive a license in an expedited manner. Consult with Law and Compliance if you have any questions.

**For more information for employees, please refer to our Anti-Bribery Policy.**



## INTERNATIONAL TRADE AND TRANSPORTATION

Ingevity conducts business in compliance with many complex global trade laws that regulate movement of products, services and technology across international borders.

- We strive to ensure compliance with all Applicable Law addressing international export and import regulations and trade laws, provided they do not contradict U.S. laws and regulations. This includes, but is not limited to, import and export laws, trade embargoes and economic sanctions. We also monitor transactions arranged through third parties to ensure compliance.
- We do not sell or ship to third parties if we know or suspect that such activity will violate anti-boycott laws or regulations.
- We do not participate in boycotts that are not sanctioned by the U.S. government, such as refusal to do business with certain countries or companies, or other agreements to discriminate based on race, religion, sex, national origin or nationality.
- We apply proper transportation labeling and placarding and ensure required licenses, permits and other approvals are in place.
- We audit trade documentation on a routine basis to ensure it is completed thoroughly and accurately.
- You must immediately report any actual or suspected violation to Law and Compliance and consult with them on any questions or concerns.

**For more information for employees, please refer to our Export Controls and Customs Law Compliance Policy and additional policies and procedures available in our Policy Library.**

WE BEHAVE  
ETHICALLY IN  
OUR BUSINESS  
ACTIVITIES



## CONFLICTS OF INTEREST

Reputable business practices require the exercise of good judgment, honesty and high ethical standards at all times. One reason for our success is that Ingevity's team members make independent and objective business decisions in the best interest of our company. Ingevity team members must avoid any situation that conflicts or appears to conflict with their duty to act in the best interest of Ingevity.

In general, a conflict of interest can occur when you have to choose between what is in your or your family or friends' best interest (financial or otherwise) and what is in the best interest of Ingevity.

### **What could be considered a conflict of interest that needs to be disclosed?**

The following are examples of potential conflicts of interest:

- Owning shares, stock or other interests (whether debt or equity) in companies doing business or competing with Ingevity;
- Serving on the board of directors of another company (including a competitor, supplier or customer) while employed by or under contract with Ingevity;
- Employment outside of Ingevity, including self-employment, that is in competition with Ingevity or that adversely affects your job performance at Ingevity;
- Situations in which you, your close friends or family members, or a company owned by such individuals will personally profit from business transactions with Ingevity;
- Situations in which you accept a business opportunity that you learn of through your employment with Ingevity or through the use of Ingevity resources;
- Receiving inappropriate gifts, entertainment or other personal benefits for yourself, a relative or another person from potential suppliers or other third parties seeking business relationships with Ingevity;
- Participating in the selection process or overseeing the work of a business in which you, or someone you have a close relationship with, are employed or have an ownership interest;
- Influencing a hiring decision involving, or directly managing, a relative or close personal friend;
- Using or selling Ingevity property, information, assets, services or position for personal gain; and
- Conducting a romantic relationship with a subordinate.

Engaging in or not disclosing actual and potential conflicts of interest may discredit Ingevity or the Ingevity team member.

To avoid a conflict, or even the appearance of a conflict of interest, between Ingevity's interests and your personal interests, you must:

- Recognize and avoid situations that may interfere with your ability to make the right decisions.
- Not use business opportunities identified through your employment with Ingevity for personal gain.
- Fully disclose any potential conflict of interest following the requirements of the Seeking Guidance, Speaking Up and Reporting Section of this Code.

**Question:** My manager hired a contract company to do project work and his relative owns the company. No other companies that do this type of work were considered before this company was hired. Is this a conflict of interest?

**Answer:** Yes, if the manager did not disclose that the contract company is owned by his relative and approval to move forward with that company was not obtained from his manager, this is a conflict of interest that must be reported to your Human Resources Business Partner or as detailed in the Seeking Guidance, Speaking Up and Reporting Section.

**For more information for employees, please refer to our Conflict of Interest Policy.**

## SECURITIES AND INSIDER TRADING

In the course of their employment or affiliation with our company, Ingevity team members often become aware of confidential, proprietary or privileged information concerning significant aspects of Ingevity's business or the business of Ingevity's customers, suppliers and/or business partners. It is a violation of this Code and securities laws for any Ingevity team member to trade securities on the basis of material, non-public information (commonly referred to as "insider information"), or to "tip" such information to others.

### What is considered material non-public information?

Information is considered "material" if it could affect an investor's decision whether to purchase, sell or hold Ingevity's securities or the securities of one of Ingevity's customers, suppliers or business partners. Information is "non-public" until it has been made publicly available and sufficient time has elapsed for the securities markets to receive and act on the information.

Common forms of material non-public information include, but are not limited to:

- Earnings estimates or changes in previous earning statements;
- Securities splits;
- Winning or losing major contracts;
- Invention disclosures and patent applications;
- Potential acquisitions or divestitures;
- Mergers;
- Major litigation;
- Significant changes in competitive position;
- Major financial transactions;
- Corporate crises such as those involving cybersecurity incidents;
- Changes involving senior leadership and customers;
- Business unit or product line information that is normally not available to the public; and
- Other significant information that is not yet publicly available.

Any Ingevity team member who is unsure of his or her responsibilities related to insider trading (including whether information is material non-public information) should seek guidance from Law and Compliance.

### What should I do if I have material non-public information?

- Do not use material non-public information when trading securities for personal financial gain.
- Do not discuss or share material non-public information in any manner with others, who are not authorized or do not have a business need to know. This includes relatives, other members of your household and close personal friends.
- Protect material non-public information that you become aware of in the performance of Ingevity business activities.
- Comply with any restrictions set by Ingevity Policies on when and how Ingevity's securities can be traded, when pre-clearance of securities trades is required and similar matters.
- Immediately report any known or suspected improper disclosure of material non-public information or inappropriate securities trading to Law and Compliance, and consult with them on any questions or concerns. Insider trading violations can result in severe civil or criminal liability for you and Ingevity.

**Question:** I'm working on a confidential M&A project and know that I can't trade in Ingevity's or the other company's securities while this information is not public. But, if information about this transaction is leaked or rumors are published by the press, can I buy stock then?

**Answer:** No. Under securities laws, it is illegal to buy or sell securities based on material information before such information is officially made public. This applies to both Ingevity securities and the securities of the other company.

**For more information for employees, please refer to our Securities and Insider Trading Policy.**

## FINANCIAL ACCURACY, DISCLOSURE AND RECORDS

- Ingevity is committed to maintaining accuracy and completeness of our books and records, financial disclosures and ensuring our financial commitments and resources are managed in a responsible manner. Ingevity team members have an obligation to ensure the accuracy of such records and to report any instances of inaccurate records or suspected fraud. We seek to ensure accuracy and completeness when completing financial and business records. You must never intentionally falsify, modify, or fail to disclose or record any entries, accounts, assets or other information in Ingevity's books and records or direct or allow others to do so.
- We maintain thorough documentation to support our books and records and our financial and business transactions that demonstrates the business purpose and appropriate use of company funds and that help us prevent and detect fraudulent or questionable financial transactions.
- We seek to ensure public financial statements and disclosures conform to Ingevity accounting policies and generally accepted accounting principles where applicable.
- We promote full, fair, accurate, timely, and understandable disclosure in the reports and documents filed with, or submitted to, the Securities Exchange Commission ("SEC") and in other public communications.
- You must not exaggerate or include inappropriate, misleading or derogatory remarks, legal conclusions or other statements that might prove to be misunderstood or wrong either in general or when examined during an audit or regulatory or legal proceeding.
- You must participate openly and honestly in routine internal and external financial audits, system evaluations or investigations.
- You must use Ingevity funds responsibly and for cost effective expenditures within the applicable budget. You must ensure all transactions are properly authorized and recorded.
- You must only authorize appropriate, legitimate transactions, including the signing of contracts and agreements, that are covered by the authority delegated to you as an Ingevity team member.
- You must only use corporate credit or purchasing cards for legitimate and reasonable business expenses and must submit invoices for payment of such expenses. You must be honest and accurate when completing expense reports, filing workers compensation or benefits claims and accounting for your time at work, vacation time and personal leave.
- You must report all known or suspected financial inaccuracy or fraud to the appropriate person(s) as detailed in the Seeking Guidance, Speaking Up and Reporting Section of this Code.
- Additionally, members of Ingevity's Leadership Team must immediately report any material issue related to disclosures or other public communications to Ingevity's General Counsel or the Chair of the Audit Committee for assessment by the Audit Committee, as appropriate.

**Question:** I want to use my corporate expense card to buy a present for my daughter, since my credit cards are currently at their limit. I'll pay the amount using a personal check, so this shouldn't be a problem, right?

**Answer:** No, you must not use your corporate credit card for personal expenses. Even if you intend to pay the amount personally, this is misuse of company property.

**For more information for employees, please refer to our Finance and Accounting Policies in the Policy Library.**



## RECORD RETENTION

Ingevity's Record Retention Policy and Schedule outlines requirements that Ingevity team members must follow with regards to which records to keep, which to discard and when to discard them.

- You must comply with Ingevity's Record Retention Policy and Schedule for all printed and electronic records, including keeping records for as long as legally required or as necessary for business needs.
- You must follow instructions in any notice of litigation hold received and retain records that are relevant and potentially relevant to the matter under investigation or in litigation, preserving these records in their current state without alteration, for as long as required in the notice. Failure to do so could result in civil or criminal liability for the Ingevity team member(s) involved and/or Ingevity.
- Any Ingevity team member who has questions or concerns regarding Ingevity's Record Retention Policy and Schedule, litigation holds or similar topics should consult with Law and Compliance.

**Question:** I was just notified of a litigation hold on electronic documents that I have in my files that likely contain relevant information. I had intended to go through them earlier this week to delete some of them. Can I still do that since I had intended to remove some of them from my files before the litigation hold was issued?

**Answer:** No, you must not delete or modify any relevant records once you have been notified of a litigation hold.

**For more information for employees, please refer to our Record Retention Policy and Schedule.**



# WE SAFEGUARD OUR ASSETS AND RESOURCES

All Ingevity team members have a duty to safeguard and properly use Ingevity's records, information technology and physical assets, as well as proprietary and confidential business information and personal data and information.

## INFORMATION TECHNOLOGY (IT) ASSETS AND SECURITY

Ingevity is committed to protecting our Information Technology ("IT") systems and using these assets in a secure and responsible manner to prevent unauthorized access and other interference.

- Ingevity's IT assets are the property of Ingevity and are to be used primarily for appropriate company business, with allowance for limited personal use in accordance with Ingevity Policies. These assets include computers, e-mail, Intranet and Internet access, telephones, mobile devices (if provided by Ingevity) and voicemail. In addition, these assets must not be used for inappropriate purposes, including without limitation: sending harassing, threatening, offensive, discriminatory or derogatory remarks, messages or jokes; installing of file-sharing or peer-to-peer networks; conducting illegal, unethical or improper business; engaging in excessive personal use of such systems during work hours; and downloading copyright-protected material.
- All sensitive or confidential information must be secured through use of approved authentication, authorization, and/or encryption controls defined, controlled and authorized by Information Security.
- All assets must be safeguarded from viruses, spyware and other types of malicious code by: not disabling or interfering with antivirus or other protection software; not connecting personal devices to Ingevity networks; not opening attachments or clicking on links in suspicious emails; not installing unapproved software; and not using USB drives. You must use only software, applications and communication/collaboration platforms that have been approved and properly licensed for use by Ingevity.
- You must protect corporate laptops and mobile phones from damage, theft and loss by: storing devices securely when not in use; ensuring hard-drive encryption and other required protection software is employed; using privacy screens; and complying with the IT Acceptable Use Policy.
- You must keep your usernames and passwords secure at all times, and are prohibited from sharing your usernames and passwords with others within or outside of Ingevity. Your passwords must be strong to prevent unauthorized access to systems.

- You must be diligent, careful and professional in your written and verbal communications when using Ingevity's IT and communications systems to create documents, emails, texts, social media posts, and voice messages just as you are when interacting in person. Electronic messages are a lasting and recoverable written record that can be easily copied and forwarded worldwide without your consent. They also may constitute Ingevity's company records.
- You must immediately report suspected or verified security events or violations of Ingevity's Acceptable Use Policy whether by Ingevity team members or third parties acting on behalf of Ingevity to Information Security as described in the Cyber Security Incident Response Plan.
- Any Ingevity team member who has questions or concerns regarding IT topics should contact Information Security.

**For more information for employees, please refer to our IT Acceptable Use Policy and the Cyber Security Incident Response Plan.**





## PHYSICAL ASSETS AND SECURITY

**Ingevity is committed to maintaining appropriate physical security measures to protect people, and to prevent misuse of, damage to, or theft of company assets and resources, and to respond appropriately should a crisis or emergency event occur.**

- We ensure appropriate physical security and emergency response safeguards are implemented to reduce risks.
- We do not allow persons who do not possess approved access identification to enter Ingevity property.
- We accompany contractors and visitors 100% of the time they are on Ingevity locations if they have not received appropriate training and/or have not been approved for non-escorted access.
- We protect Ingevity equipment and store hard copy records and documents in secure locations to prevent theft, damage or inappropriate destruction.
- You must only use Ingevity resources for legitimate business purposes and do not use or sell Ingevity physical assets or resources for personal gain unless appropriate approvals have been obtained.
- We ensure Ingevity assets and resources that require disposal are disposed of properly.
- When off-site on business, we travel responsibly and take precautions to ensure our safety as well as the security of our IT and physical assets.
- We report any actual or potential concerns or issues associated with assets, unauthorized access, security or emergency response as detailed in the Seeking Guidance, Speaking Up and Reporting Section of this Code.

Ingevity is committed to providing a safe and secure workplace with a zero tolerance for incidents of workplace violence committed by or against Ingevity team members, contractors, vendors, customers or visitors. Prohibited conduct includes, but is not limited to, threats, physical abuse, stalking, vandalism, arson or sabotage. Everyone must practice safe and respectful behavior on Ingevity property and any time they are conducting Ingevity business, regardless of location.

Our commitment to a violence-free workplace also includes zero tolerance for the possession of weapons (including components that could be assembled to become a weapon) on Ingevity property, in Ingevity facilities, or while conducting Ingevity business unless specifically authorized by Ingevity.

**For more information for employees, please refer to our Physical Security Standard and Corporate Crisis Management Plan.**

## INTELLECTUAL PROPERTY (IP) AND CONFIDENTIAL INFORMATION

Ingevity is committed to protecting our intellectual property (“IP”) and confidential or proprietary information (“Confidential Information”) and respecting the intellectual property rights and confidential information of others.

### **What does Ingevity consider as Intellectual Property?**

The term IP encompasses the legal rights that may be secured in creations of the human mind or intellect (for example, an idea, invention, machine, device, process, program, software, drawings, name, logo or slogan) and that may be legally protectable or enforceable through legal processes or claims (such as through copyright, trademark, service mark, patent and/or trade secret).

Restricting the use of IP helps Ingevity protect its ideas and brand identity. Each Ingevity team member has a responsibility to secure Ingevity’s IP and respect the same of other organizations. All Ingevity team members must abide by all Applicable Law and Ingevity Policies related to IP.

### **What does Ingevity consider as Confidential Information?**

Confidential Information of Ingevity, and of other companies, is a broad category that includes any information that is valuable to Ingevity, is not generally disclosed outside the company and that may be useful or helpful to our competitors. Examples of Confidential Information include, but are not limited to: trade secrets; technical data; product development data; production plans; plant capacities; manufacturing procedures; product compositions; business plans and models; supplier and customer contracts and agreements (including negotiations relating to same); customer and sales data; customer lists; product pricing; financial performance data; personnel performance and compensation data; and other Ingevity team members’ personally identifiable data.



## What is my responsibility to protect IP and Confidential Information?

IP and Confidential Information gathered and generated during business operations is critical to Ingevity's success. Both forms of information are essential components of our business value and brand identity. Each Ingevity team member has an obligation to guard IP and Confidential Information closely and protect them against misappropriation, unintentional disclosure and internal/external threats.

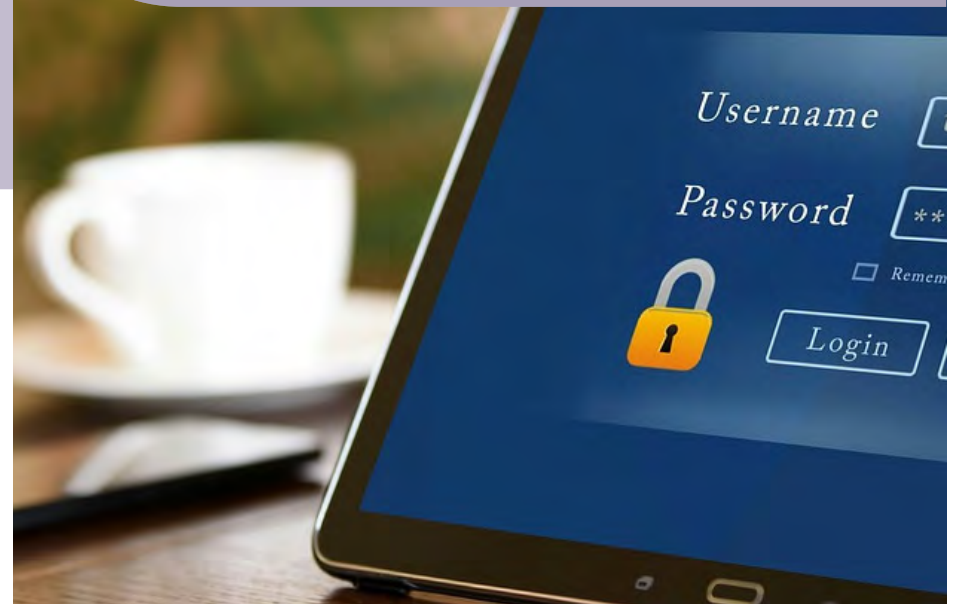
- Sharing of Confidential Information must be limited to: approved Ingevity team members who have a need to know; any other party authorized by Law and Compliance, the Ingevity Executive Team or Applicable Policies; and as required by Applicable Law based upon the advice of Law and Compliance.
- Ingevity team members must not share, seek or accept IP or Confidential Information with or from sources outside of Ingevity unless written, approved confidentiality agreements or appropriate approvals from Law and Compliance are in place.
- Confidential Information must not be shared or stored using personal email, personal file storage accounts, on social media or via other public forums.
- Ingevity team members must always be alert to inadvertent disclosures that may arise either in social conversations or normal business relations with Ingevity suppliers and customers.
- Each Ingevity team member must understand and agree that IP created or Confidential Information gained or accessed while working for Ingevity belongs to Ingevity and must be protected during and after employment with Ingevity. Ingevity team members are prohibited from violating any third party's copyright, licensing, or other IP rights by improperly reproducing or distributing protected materials.

All incidents involving inappropriate sharing or receipt of any IP or Confidential Information, to or from Ingevity team members or third parties acting on behalf of Ingevity, that should not have been shared or received, must be promptly reported as detailed in the Seeking Guidance, Speaking Up and Reporting Section of this Code.

**Question:** I'm working with a team to resolve a processing issue. We solved this same type of issue where I used to work using a process improvement that I helped implement. Can I share this information with my team without telling them where it came from? My prior company competes with Ingevity in some markets.

**Answer:** No. Your previous employer likely had you sign a non-disclosure agreement that prohibits you from sharing the information outside of that company. Even if you did not sign a non-disclosure or similar agreement you must not share or use proprietary or confidential information from a prior employer while employed at Ingevity.

**For more information for employees, please refer to our Fiduciary Duty Policy.**



## PERSONAL DATA AND INFORMATION PRIVACY

Ingevity protects all personal data of Ingevity team members, our customers, our suppliers and our shareholders, and is committed to complying with Applicable Law pertaining to such data.

### What is personal data?

“Personal Data” is non-public information regarding, reasonably associated with, linked directly or indirectly, or otherwise attributable to a natural person. In short, Personal Data is information relating to you or that may be used to identify you or any other person.



### How does Ingevity use and protect Personal Data?

- We may collect and/or process Personal Data, including: personal contact information such as name, address, phone numbers, personal email address; personal financial information such as personal bank account numbers; biographical information such as date of birth, gender, marital status, citizenship status; job application details; employment details; medical/health information; government issued identification information; and customer account data.
- We control and process Personal Data for Ingevity team members, customers, suppliers and other third parties in a safe and secure manner to respect privacy, protect rights and prevent unauthorized access, use, alteration or disclosure.
- We collect and process Personal Data only for specified, explicit, legal and legitimate business purposes. We do not process Personal Data for purposes other than the purpose for which it was originally collected.
- We limit access to Personal Data to those that are approved and have a specific need to know.
- We share Personal Data with third parties only when appropriate and when required security measures and confidentiality agreements are in place.
- You must immediately report any actual or suspected Personal Data breach or data protection incident such as inappropriate disclosure, loss, theft, or other unauthorized processing of Personal Data by contacting Law and Compliance and Information Security as described in Reporting a Cyber or Data Privacy Breach.

**Question:** My manager printed a co-worker's performance review and annual merit increase information. She forgot to get this information and I found it on the printer. What should I do?

**Answer:** You should promptly return this information to your manager. If you see a trend of personal data and information being printed and left on the printer, you should speak to your Human Resources Business Partner so they can address this issue appropriately.

**For more information for employees, please refer to our Data Privacy and Protection Policy.**

WE POSITIVELY  
IMPACT OUR  
COMMUNITIES  
AND THE WORLD



## CHARITABLE AND POLITICAL ACTIVITIES

Ingevity seeks to be a positive influence in the communities where we operate and where Ingevity team members and their families live.

- We implement The IngeviWay vision through charitable giving, matching gift programs, educational scholarships and Ingevity team member volunteer programs that are essential to our company culture and our business operations.
- We ensure charitable gifts by Ingevity are designated to verified public charities not associated with political affiliations, recorded properly and are used appropriately.
- We support our communities through company-sponsored volunteer engagement opportunities.

- We do not attempt to gain influence, favors or inappropriate business advantages when making charitable and political contributions or participating in activities on behalf of Ingevity.
- We permit gifts, entertainment and payment of travel and lodging involving government officials in strictly limited circumstances as detailed in the Gifts and Entertainment section of this Code.
- You must obtain approval from Law and Compliance before:
  - Engaging in any activity on behalf of Ingevity that may be considered lobbying;

- Agreeing to any visit by a public official of candidate for office at any of our locations; and
- Making any political contributions and engaging in any activities on behalf of Ingevity involving government officials, political campaigns or elections, lobbying, political action committees or other purposes.

**For more information for employees, please refer to our IngeviCares site and our Political Contributions Policy and Political Lobbying Policy.**



## COMMUNICATING WITH THIRD PARTIES AND THE PUBLIC

Ingevity is committed to communicating with the public truthfully, consistently and transparently. Unauthorized and inappropriate releases of information to the public can result in violation of disclosure laws, shareholder confusion and damage to Ingevity's competitive position, brand and reputation. Therefore, only authorized Ingevity team members may make public statements or speak publicly on behalf of Ingevity.

- If you receive a request from the media, promptly forward such request to Corporate Communications.
- If you receive a request from investors or financial analysts, promptly forward such request to Investor Relations.
- If you share information on a social media platform, you must make it clear that you are not communicating on behalf of Ingevity unless authorized to do so. Discussing Confidential Information or posting false, inaccurate or misleading information regarding Ingevity, other Ingevity team members, or Ingevity's customers or suppliers is strictly prohibited. You must always communicate in a respectful and professional manner if including any views and opinions regarding any type of information about Ingevity.
- You must cooperate in an open and honest manner during any internal or external audits, providing requested information.
- If you are contacted regarding a legal matter or investigation, or audit requests from customers or third parties, you must promptly contact Law and Compliance for guidance.

**Question:** I saw comments about our workplace that one of my co-workers posted on social media that I thought were racially insensitive. Should I report this?

**Answer:** Yes, if you see an inappropriate post on social media that involves Ingevity, you should report this to your manager or Human Resources Business Partner or as detailed in the Seeking Guidance, Speaking Up and Reporting Section of this Code so an investigation can be completed and appropriate corrective measures implemented.

**For more information for employees, please refer to our Communications Policy and Social Media Policy.**



## SUSTAINABILITY

At Ingevity, our purpose to purify, protect and enhance the world is at the core of all we do, and each one of us plays a role in contributing to a sustainable future.

Ingevity's material sustainability objectives provide a framework that enables the company to fulfill our purpose to purify, protect and enhance the world around us. At the foundation of all we do is our commitment to operating in an ethical manner with all stakeholders and in every area of our business.

- We integrate responsible economic, environmental and social principles into our global business strategy and decision making.
- We perform our daily work in a responsible, ethical and sustainable manner.
- We expect our suppliers to comply with Ingevity's Supplier Principles of Conduct and to incorporate sustainable practices into their operations and abide by all Applicable Law and regulations in effect where they operate.

**For more information, please refer to our Sustainability Report and our Supplier Principles of Conduct on [ingevity.com](https://www.ingevity.com).**

### MANUFACTURE RESPONSIBLY

Our aim is to be the most environmentally responsible provider of specialty chemistries and renewable gas solutions.

We're focused on reducing our GHG intensity, growing our participation in the renewable energy landscape, and further lessening the ecological impacts of our products and operations.

### PRIORITIZE PEOPLE

With safety as a guiding principle in all we do, Ingevity's commitment to recruit and retain diverse views and foster equity and inclusivity is the chemistry that propels our people to do their best work.

We take pride in being a positive influence in the communities where we operate, creating a better future for all.



### PURSUE EXCELLENCE

From the manufacturing floor, to our customer interactions, to the boardroom - we hold ourselves to the highest standards and seek to do things the right way.

Our reputation as an ethical business partner is a competitive advantage and ensures an environment of respect and trust for our employees across the world.

### EMBRACE INNOVATION

The bio-based nature of our raw materials and environmental benefits of our products in use allow us to be a participant in the circular economy.

Our customer-focused innovation efforts aim to solve tough customer challenges with solutions that meet their sustainability goals and safeguard the planet's health.

# ADDITIONAL RESOURCES AND INFORMATION



## CODE MODIFICATIONS



Ingevity reserves the right to modify this Code of Conduct as needed. Significant changes to this Code will be approved by the Board of Directors and communicated broadly to Ingevity team members and third parties as appropriate, or as required by Applicable Law or a New York Stock Exchange listing standard. A revised copy of this Code will be posted on the company's website.

## WAIVERS

Only the Board of Directors and the Nominating and Governance Committee ("N&G Committee") of the Board of Directors can grant waivers from the provisions of this Code applicable to executive officers and directors (including Ingevity's principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions). The Audit Committee and the N&G Committee can also make recommendations to the Board of Directors for it to make such a waiver. Any such granted waiver will be disclosed promptly on the Company's website, [www.ingevity.com](http://www.ingevity.com) and will remain posted for a minimum of 12 months. The Board of Directors and the N&G Committee do not typically allow waivers of this Code. In the extraordinary event that a waiver is granted, it will be disclosed as required.

## ADDITIONAL POLICIES AND RESOURCES

Additional policies are available for employees in Ingevity's Policy Library.

Members of Ingevity's Global Compliance Council are available to assist with questions and concerns that are specific to their functional area of expertise. Information on Global Compliance Council members and on numerous ethics and compliance topics is available on the Law and Compliance and Ethics and Compliance sites.

# AFFIRMATION

I have read and understand the Ingevity Code of Conduct.

I will take appropriate steps to ensure effective compliance with the Code of Conduct, with company policy, standards, procedures and with the laws and regulations that apply to my responsibilities at Ingevity.

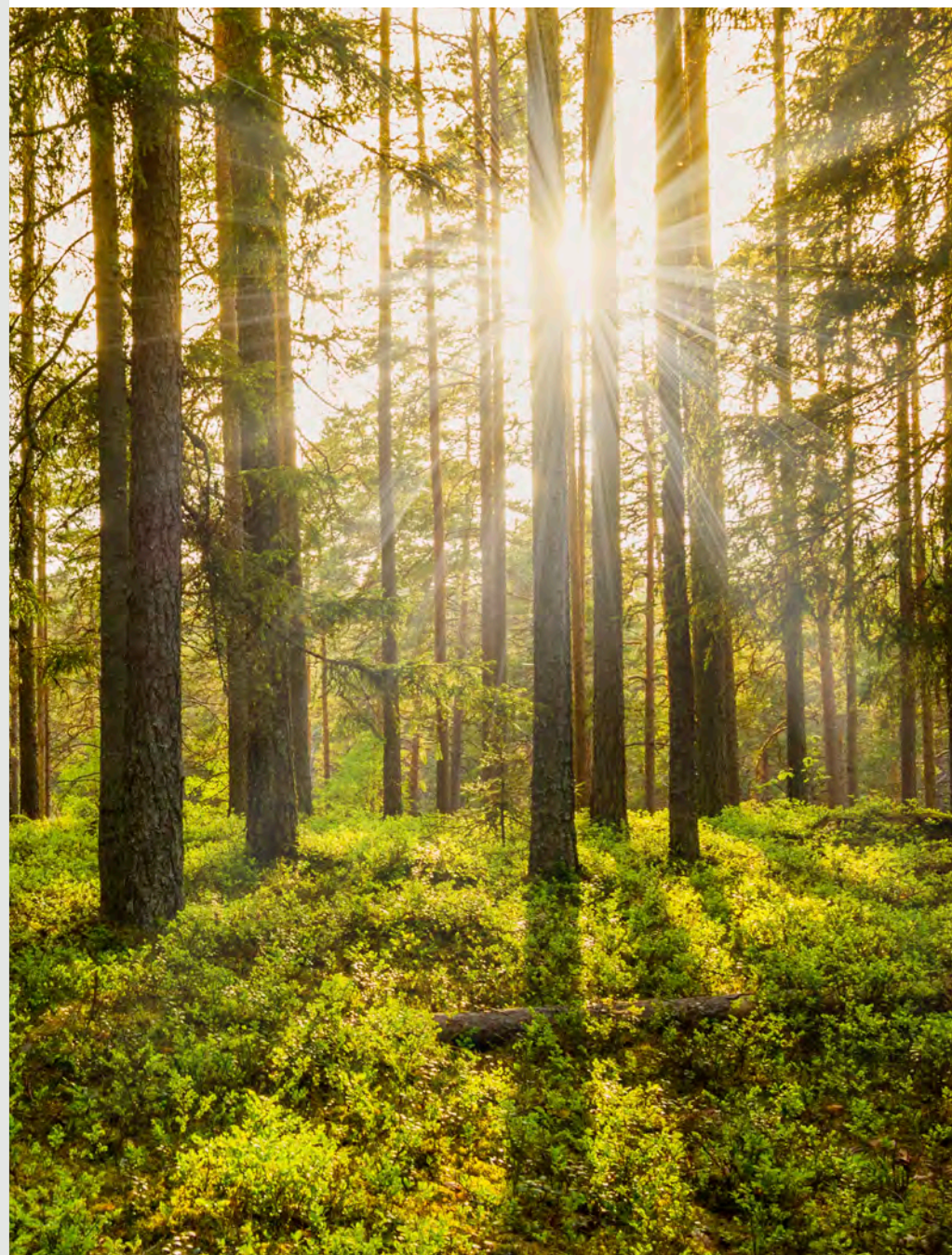
If I have a concern regarding a possible violation of the Code, company policies, standards, procedures or applicable laws and regulations, I will report my concern to my manager, Human Resources Business Partner, Law and Compliance or other appropriate contact identified in this Code.

Signature \_\_\_\_\_

Print name \_\_\_\_\_

Date \_\_\_\_\_

***\*Note: This Code of Conduct does not create a contract of employment or alter the at-will nature of any employee's employment in any way.***



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