



GLOBAL



OF CONDUCT

TABLE OF CONTENTS

A Message From Our Executive Leadership Team	3
Our Code of Conduct Is Our Responsibility	4

OUR BUSINESS

Compliance With All Applicable Laws, Rules, and Regulations	6
Anti-Bribery and Corruption	7
Meals, Entertainment, Gifts, and Travel	11
Antitrust and Competition	14
Insider Trading	18
Conflicts of Interest	19
Maintaining Business and Financial Records	22
Confidentiality and Intellectual Property	25
Good Cybersecurity Practices	28

OUR PEOPLE

Diversity, Equal Opportunity, and Respect	30
Harassment and Bullying	33
Substance Abuse in the Workplace	37
Health and Safety	40
Workplace Violence	43
Labor Policies	46

OUR CITIZENSHIP

Protecting the Environment: Sustainability	48
Corporate Social Responsibility	52
Political Activities and Contributions	53
Communication With the Public	56
Use of Social Media	59

TAKE ACTION

Making Decisions and Speaking Up	61
Investigation and Response	64
Anti-Retaliation Policy	65

OUR COMMITMENT	66
----------------	----

Code of Conduct Certification	67
-------------------------------	----

A MESSAGE FROM OUR EXECUTIVE LEADERSHIP TEAM

Stronger Together

SI Group is Stronger Together—today, we are a business built on a rich history of integrity and business excellence. We have worked hard to cultivate relationships with our global colleagues, the communities where we live and work, and our customers. These relationships are built on a strong foundation of trust—a reliance that, as an organization, we remain deeply committed to maintain. We conduct our global business with the highest degree of ethics, integrity, and compliance with legal and business practices worldwide.

The world around us is rapidly evolving, and the complexities of operating in a global environment are increasingly challenging. Therefore, it is vital for us to align ourselves around a Code of Conduct—a framework that provides a practical, consistent, and common approach to business practices across our global footprint.

We ask that each of you familiarize yourself with SI Group's Code of Conduct. No matter your position or function within the organization, it is a critically important component of your job. Remember, our collective commitment to doing the right thing each and every day is a reflection of our brand, our reputation, and our future growth.

Mike Farnell

SVP — General Counsel & Regulatory Affairs

Brooke Manrique

SVP — Human Resources & Communications



OUR CODE OF CONDUCT IS OUR RESPONSIBILITY

At SI Group, we focus not just on achieving operational results, but we also measure our success by how we achieve them. Every decision we make and every action we take must be driven by the highest sense of business and professional integrity. This Code of Conduct is designed to help employees understand how our basic ethical principles and values apply to day-to-day activities and how they impact our dealings with our colleagues, business partners, and surrounding communities. The Code of Conduct is intended to be a valuable resource to help our employees make informed, ethical decisions.

While this Code provides important guidance, it cannot answer all of your questions or address every situation. That is why we have established other resources—including people to consult, policies, procedures, as well as the Living our Values hotline and website—to provide additional information and support. SI Group relies on its employees to use good judgment and to speak up when you have questions or concerns. As SI Group operates in several different countries, there may be times when local laws, regulations, or customs conflict with our Code of Conduct. Whenever there is a conflict or a difference between a local custom or legal requirement and our Code, you must apply the strictest standard. You should never follow local customs that violate our Code of Conduct.

Bringing the Code of Conduct to life in our everyday interactions includes upholding SI Group values in our daily behavior and expecting the same of others. You can do this by:

- Leading by example, setting high standards for your own personal conduct, and helping your colleagues recognize the importance of the Code.
- Speaking up when you believe the spirit of the Code and its requirements are not being upheld.
- Using the resources in this Code to guide your decisions when faced with an ethical dilemma, or asking for help if you are uncertain.
- Communicating the values of our Code of Conduct to contractors, agents, distributors, and other business partners and requiring them to uphold these values when working with SI Group or on our behalf. We will take appropriate measures where we believe our business partners have not met our expectations or their contractual obligations in this area.

Each director, officer, and employee has a responsibility to read and be familiar with the information in this Code of Conduct and will be required to certify that they understand and agree to act in accordance with the Code of Conduct.

OUR BUSINESS

We conduct our business in an honest and ethical way. We are a company that others can trust to operate legally and responsibly. SI Group achieves commercial excellence and competitive advantage through the value of its products and its superior level of service. We will not seek unfair advantage through manipulation, concealment, abuse or misuse privileged information, misrepresentation, or any other fraudulent practice. We treat others the way we would like to be treated. SI Group will not tolerate unethical or illegal business practices by its employees, contractors, or business partners.



COMPLIANCE WITH ALL APPLICABLE LAWS, RULES, AND REGULATIONS

We work in an industry that is subject to numerous laws, rules, and regulations established for the purposes of protecting our workers, customers, communities, and the environment.

SI Group is committed to full compliance with these laws, rules, and regulations with respect to the conduct of our business and expects a similar commitment from all business partners doing business with SI Group.



All officers, managers, and supervisors are responsible for understanding the laws, rules, and regulations affecting their area of operation and for ensuring that colleagues within their departments receive adequate information and instruction so everyone can support SI Group's commitment to this compliance.

To ensure employees understand these responsibilities, we will provide periodic training opportunities, tools, and resources.

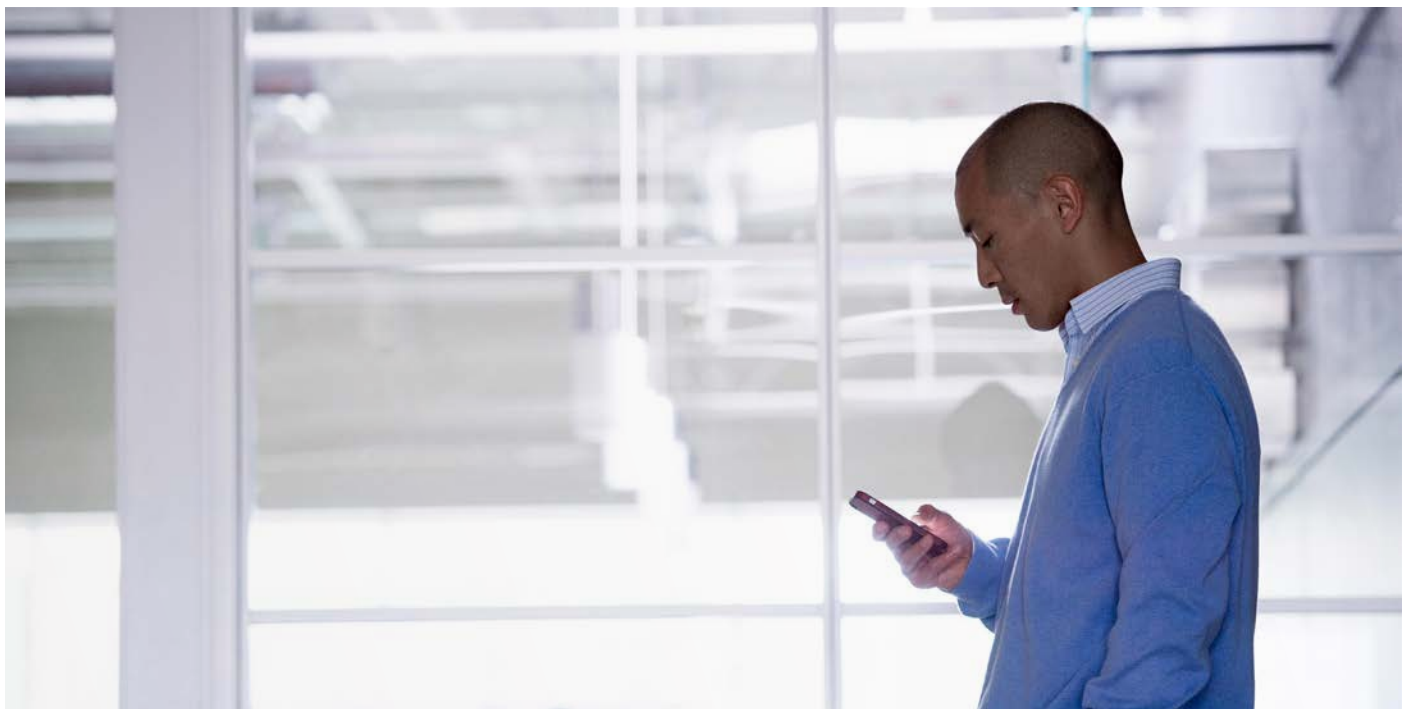
If you are in doubt or unsure how to handle a situation, please reach out to SI Group's Legal Department for guidance.

ANTI-BRIBERY AND CORRUPTION

SI Group does not engage in or tolerate bribery or any other corrupt business practice anywhere in the world, in the public sector, or the private sector. SI Group's Anti-Bribery and Corruption Policy ("ABC Policy") provides guidance on how we implement our core values to avoid corrupt business practices or other conduct that could be perceived as unethical.

The ABC Policy seeks to ensure compliance with all relevant anti-bribery and corruption laws, including the U.S. Foreign Corrupt Practices Act of 1977, the U.K. Bribery Act 2010, and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. In any business situation (whether dealing with foreign officials or not), it is unacceptable for an SI Group employee, or any representative of SI Group, to offer or provide anything of value to a public or private entity or to an individual with corrupt intent. It is likewise unacceptable for an employee or representative of SI Group to receive a cash payment, or receive a gift or other favor, as a bribe or personal inducement to enter into a transaction on behalf of SI Group. Any demand for, or offer of, a bribe or similar inducement must be rejected immediately and reported to management.

**SI Group
seeks to ensure
compliance with
all relevant
anti-bribery and
corruption laws**



ANTI-BRIBERY AND CORRUPTION (CONTINUED)

SI Group also requires certain third-party representatives (including sales agents and distributors) to certify compliance with our ABC Policy and complete related training. These due diligence actions must be completed before authorizing any third-party representative as an approved business partner.

In general, employees and business partners must abide by the following rules:

- **Do not offer or accept bribes**, or any other kind of improper payment or gift, including facilitation payments.
- **Promptly report solicitations** (requests for corrupt payments or gifts), red flags (facts or circumstances suggesting risk or improper conduct), and/or ABC Policy violations as outlined in the ABC Policy.
- **Keep accurate books and records** so that payments are properly described and company funds are not used for unlawful purposes.
- **Know who you are doing business with** by following our due diligence procedures for third-party representatives.



Violations of anti-bribery and anti-corruption laws can result in criminal and/or civil penalties for the individuals involved in wrongdoing, including large fines and long prison sentences. There could also be consequences for SI Group if one of our employees or third-party representatives violates anti-corruption laws. These penalties can be significant and cause lasting damage to SI Group's business reputation. Please refer to SI Group's ABC Policy for a more thorough description of the requirements of the policy, the specific guidelines for appropriate behavior, and the options for reporting possible violations of the ABC Policy. Potential violations of anti-bribery and anti-corruption laws as well as SI Group's ABC Policy are not always clear. Many of the cases are fact-specific. If you have any questions about whether a specific request or offer is problematic, contact SI Group's Legal Department for direction.

ANTI-BRIBERY AND CORRUPTION

Q&A

QUESTION:

I am trying to get products through customs...

to complete a shipment to a foreign customer who is anxiously awaiting delivery to avoid delay in manufacturing. When I called the customs agent to determine when the shipment can be cleared, the customs agent indicated there is a “backup” and many shipments are awaiting clearance, but he can guarantee that the shipment will clear customs within the next week if I pay an “administrative fee” of \$1,000 USD. Can I pay this fee to get the product delivered to the customer in time?

ANSWER:

It depends. Generally, this type of payment is referred to as a facilitation payment or grease (a payment to a government official to expedite or secure a non-discretionary, routine governmental action). Facilitation payments are forbidden under the ABC Policy, even if it is common local practice. We understand that this may lead to delays and there may be a cost to SI Group because of this policy. No SI Group employee or representative will be penalized for delays or difficulties arising from their refusal of solicitation for a bribe or facilitation payment that they promptly report in accordance with the



ABC Policy. However, some government offices do provide for expedited handling of permits or other routine matters, upon payment of an official expediting fee to the government (not as a personal benefit to any government official). These fees are

generally published, and their payment will result in an official government receipt. These types of fees are not facilitation payments and are not prohibited by the ABC Policy. You should confirm prior to payment if the “administrative fee” is actually an official published fee that will be documented. If not, you should

not make the payment and should report the solicitation.

ANTI-BRIBERY AND CORRUPTION

Q&A

QUESTION:

I am trying to secure business with a large local customer. While discussing the terms of the sale, the customer's representative indicates she is leaning towards finalizing the contract with SI Group but needs to think about it some more. She then mentions that her daughter is coming home for the summer and is looking for an internship position and would love to work at SI Group. She asks if I could possibly secure a position for her daughter.

Can I assist her daughter?

ANSWER:

It depends. First, the discussion about her daughter's internship should have no connection to the contract discussions. Ideally, the contract should be finalized before any consideration or discussion of her daughter's potential employment with SI Group. However, offering her daughter an internship would not violate the ABC Policy if the customer's daughter is clearly qualified for the position for which she is applying, and she goes through all of the standard processes that other intern applicants must go through. There is no prohibition on referring potential candidates for positions that they are qualified for as long as they receive no preferential treatment in the hiring process.

MEALS, ENTERTAINMENT, GIFTS, AND TRAVEL

SI Group employees are encouraged to build strong relationships with our third-party business partners. In some cases, this may involve the offer or acceptance of reasonable gifts, hospitality expenses (meals, entertainment, and travel), and other promotional expenses. However, careful attention must be paid to ensure that such activities are conducted in an appropriate manner. If not handled appropriately, offering or accepting these items can potentially violate anti-bribery and anti-corruption laws as well as SI Group's ABC Policy.

As a general rule, providing or accepting gifts, hospitality, or other promotional expenses should meet all of the following requirements:

- **Given without corrupt intent** (such as the intent to cause a return favor), but rather only for legitimate business reasons, such as part of a company tradition of providing equivalent company-branded gifts to a group of similar customers on a particular holiday, reasonable hospitality expenses incurred to promote or demonstrate SI Group products, or expenses necessarily incurred in connection with the performance of a contract.
- **Any gifts, meals, entertainment, or travel are modest in value** (not excessive or lavish) and proportionate to the business activity being conducted, considering the occasion, the position of the recipient, and the value of items previously provided to other recipients of a similar position.
- **Provided openly and transparently** with disclosure to the recipient's company or entity if reasonable.
- **In compliance with local laws**, local custom and practice, and professional codes.
- **Follows guidelines and procedures** set forth in SI Group's ABC Policy regarding eligible recipient, value limits, and approval.

Giving or accepting gifts, meals, entertainment, or travel that do not meet all of the above criteria must be approved in advance by SI Group's Legal Department.



MEALS, ENTERTAINMENT, GIFTS, AND TRAVEL

Q&A

QUESTION:

I am really trying to secure the business of a large customer...

The customer's representative is coming to town for a tour of an SI Group manufacturing facility and to discuss the potential business relationship in more detail. In order to make sure the customer's representative has an enjoyable visit, I want to take the representative to dinner after his tour to discuss business, and I've also been able to secure hard-to-get tickets to an exclusive concert in the area. I am not going to attend the concert and instead will offer the tickets to the representative and tell him that he can take a guest. Will I violate SI Group's policy regarding gifts and entertainment?

ANSWER:

The dinner provides an opportunity to discuss SI Group's capabilities following a promotional tour of an SI Group facility. Under these circumstances, as long as you accompany the customer's representative, and the cost of the meal is proportionate to the occasion, the dinner is an acceptable expense. However, you should not offer the concert tickets without first discussing it with the Legal Department. Since you will not accompany the customer to the concert, the event would not provide an opportunity to discuss SI Group business. The narrative also suggests that the value of the concert tickets may be disproportionately high. Under these circumstances, a gift of the concert tickets does not appear to be for a legitimate business purpose. You should obtain advance approval from SI Group's Legal Department before providing the concert tickets.

MEALS, ENTERTAINMENT, GIFTS, AND TRAVEL

Q&A

QUESTION:

I would like to send a gift basket to one of my Chinese customers in observance of the Chinese New Year.

Is this type of gift acceptable?

ANSWER:

If the gift is similar in value to similar gifts provided to other Chinese customers in the same position, it is probably OK. But there are other considerations to bear in mind. Consideration must be given to whether the recipient is a government official or an employee of a state-owned company (common in China). Any such gifts must be approved in advance by the Legal Department, and may need to be recorded, as described in the ABC Policy.

QUESTION:

What should I do if I am offered an impermissible gift by a customer or supplier?

How do I refuse to accept the gift tactfully without risking damage to the valuable business relationship?

ANSWER:

You must explain that SI Group's ABC Policy prevents you from accepting the gift and politely decline. You must also report the offer to your supervisor and to the Legal Department.



ANTITRUST AND COMPETITION

Antitrust laws are designed to prohibit business conduct that weakens or destroys competition in the free marketplace.

Generally, antitrust laws restrict practices or agreements that unreasonably restrain trade or commerce, including agreements between two or more independent businesses which prevent, restrict, or distort competition to an appreciable extent; and conduct which amounts to an abuse of a dominant market position. Antitrust and competition laws are complex and often fact-specific. For this reason, if you have any questions about practices that you feel may violate antitrust and competition laws, you should consult SI Group's Legal Department.

ANTITRUST AND COMPETITION (CONTINUED)

The following guidelines are intended to help avoid violating competition laws involving communications or interactions with competitors:



DO:

- **Exercise independent judgment** and, to the extent possible, avoid even the appearance of collusion with a competitor.
- **Make all pricing decisions in light of company costs**, general market conditions, and competitive prices.
- **Confine all discussions with competitors**, whether they involve specific buy/sell agreements or broader trade association contacts, to the immediate subjects for which the meeting was convened. If there is an agenda, limit the discussion to the agenda items. If you have any questions about the topics to be discussed and the topics to be avoided, consult with SI Group's Legal Department in advance.



DO NOT:

- **Enter into any discussion with any competitor** on the following subjects (unless negotiations are necessary to consummate a bona fide supplier/customer relationship):
 - Prices or discounts including minimum or maximum prices, rebates, commissions, or promotions
 - Terms or conditions of sale (including credit)
 - Costs, cost coverage, margins, or profits
 - Bids or intentions to bid
 - Sales territories or customers
 - **Discuss or agree with competitors to share markets or customers**, customer groups, territories, or lines of business.
 - **Remain at any meetings with competitors** (including informal social gatherings) where any of the forbidden subjects are discussed. In such cases, DO NOT leave quietly—object to the topic of discussion and ensure that your objection is noted and make a point of your departure so people will remember it—
- and promptly report the incident to SI Group's Legal Department.
- **Provide commercially sensitive business information to a competitor.** You obviously may provide customers with price information, even though competitors may also obtain it, but limit competitively sensitive communications with customers to those which are absolutely necessary so that you may avoid any appearance that they are being used as conduits.
 - **Share information about a customer's prices or promotional programs.** This information should be confidential.
 - **Provide a customer with information** about another customer's intended price movements or promotional plans.
 - **Announce pricing actions far in advance** in order to "test the waters" for a competitor's response.
 - **Request competitors to send copies of their price lists.** If you obtain this information from customers or other third-party sources, document where you obtained this information.

ANTITRUST AND COMPETITION (CONTINUED)

THE CHALLENGE OF TRADE ASSOCIATIONS

It is important to be particularly careful at trade association meetings and associated social gatherings. These meetings, which by definition are gatherings of competitors, can raise serious antitrust problems. Because representatives of competitors attend these meetings frequently, they get to know each other well, and there is the risk that normal social interchanges will spill over into dangerous areas.



DO:

- **Insist that potentially sensitive trade association activities are cleared in advance** with the Legal Department and monitored by counsel.
- **Document the source of any sensitive information you may obtain about a competitor**, to avoid any later inference that the information was improperly obtained.
- **Consult with SI Group's Legal Department** anytime you have concerns about discussions you may have had at a trade association or elsewhere.



DO NOT:

- **Participate in any meeting of a trade association or professional society** that does not have a stated agenda.
- **Participate in any business discussions**, however informal, that are not on the agenda.
- **Exchange any commercially sensitive information with competitors.**
- **Remain at a meeting, formal or informal, or continue a discussion where competitors are engaging in improper discussion on competitively sensitive matters**, even if you do not actively participate in the discussion. Remember, merely being present at a meeting where there is an inappropriate discussion can be enough for the competition authorities to infer that you are party to an anti-competitive agreement. Where such a discussion begins, object and ensure that your objection is noted in the meeting minutes. If such a discussion continues, leave the meeting immediately, ensure that your departure is noted in the minutes, and inform SI Group's Legal Department immediately.

ANTITRUST AND COMPETITION (CONTINUED)

Careful attention must be paid to the way in which we gather competitive intelligence. It is not a violation of antitrust and competition laws for SI Group to gather information concerning competitors, including competitive prices, where such information has been acquired in a proper manner (e.g., public sources such as advertisements or published articles, publicly available subscription services, or industry surveys by reputable consultants, provided these surveys are appropriately structured and do not, for example, involve the disclosure of commercially sensitive information). Such information can be distributed within SI Group and used in making independent business decisions, subject to applicable laws (such as data privacy laws). Customers can also be a useful source of information about competitors; provided that care must be taken to ensure that such information is not coerced from customers, and such requests should not include an expectation, whether explicit or implicit, that the customer is facilitating collusion or price fixing among competitors.

Q&A

QUESTION:

I ran into a sales representative from one of SI Group's competitors at an industry association meeting ...

We talked about the difficult sales market and which territories were the most difficult. We each had a different area that was troublesome. We talked about splitting the low-volume territories and having each of us focus on a particular area so that we wouldn't have to spread our energy over a larger low-volume area. We had an informal agreement not to sell in each other's low-volume area. Is this an antitrust violation?

ANSWER:

Yes, you are prohibited from these kinds of discussions and/or agreements. Agreeing with a competitor not to sell in a certain area (or receiving their agreement to restrict sales activity in a certain area) weakens competition in that area and limits a customer's ability to receive a fair price in a competitive market. As difficult as a particular territory might be, the free marketplace should be maintained and competition is necessary to provide fair and equitable terms for a buyer.

INSIDER TRADING



SI Group employees must comply with all securities laws and must not trade in the securities of a public company when they come into possession of material or price-sensitive non-public information concerning our publicly traded business partners.

To avoid violating securities laws:

- **Do not buy or sell securities** of any company based on material or price-sensitive non-public information.
- **Be careful when others request confidential information about our business partners.** Even casual conversations could be viewed as illegal “tipping” of inside information.
- **Do not share information that has not been made public unless doing so has been approved in writing by SI Group.**


CONFLICTS OF INTEREST

Each director, officer, and employee of SI Group is responsible for conducting their business dealings in a manner that is in the best interest of the company. Employees must exercise the utmost good faith in all transactions involved in their duties and should not use their positions with SI Group or knowledge gained as a result of their employment for their personal benefit. If you are in a position to influence decisions that may result in personal gain for you, or for a relative, as a result of SI Group's business dealings, you have an obligation to conduct business within the guidelines set forth in SI Group's Conflict of Interest Policy in order to avoid actual or potential conflicts of interest.

A conflict of interest may arise in a number of different ways:

- **Outside jobs or affiliations with competitors, customers, or suppliers**
- **Working with close relatives**, especially those who are government officials, or have decision-making authority at competitors, customers, or suppliers
- **Having an intimate relationship with another employee who can influence decisions** such as salary, performance rating, or promotion
- **Serving as a board member of another organization**
- **Personal investments**, or those of a close relative, that might influence or appear to influence your judgment

Should a potential conflict arise, you should promptly disclose the situation to your direct manager. Once disclosed, we can review the situation to determine if a conflict does exist and, if so, take steps to address the situation so the conflict can be alleviated.



You have an obligation to conduct business within guidelines set forth in SI Group's Conflict of Interest Policy

CONFLICTS OF INTEREST

Q&A

QUESTION:

I would like to join the Board of Directors for a local nonprofit foundation because it is one of my favorite charities...

This appears to fall within the description of conflict of interest.

Am I prohibited from taking this role?



ANSWER:

No. As long as the foundation is not a competitor, supplier, or customer of SI Group, your role on the Board would not affect your ability to make objective decisions in your job at SI Group.

CONFLICTS OF INTEREST

Q&A

QUESTION:

My brother-in-law just got a job in charge of sourcing at a very large company who could use one of SI Group's products. We have been trying to sell to this company for a long time.

Can I contact him directly about placing an order for SI Group's products?

ANSWER:

This situation may cause a conflict of interest that should be avoided. You should alert the General Counsel of the potential conflict so that the situation may be reviewed and a proper course of action be determined. An unrelated sales representative may need to be involved so your personal relationship does not interfere with negotiations.



MAINTAINING BUSINESS AND FINANCIAL RECORDS

Preparing and maintaining accurate and complete records are vital in meeting SI Group's financial, legal, and management obligations, as well as fulfilling our obligations to customers, suppliers, and other business partners and stakeholders, fellow employees, owners, regulators, and others. Whenever we are required to prepare business records, we must ensure accuracy and completeness, regardless of whether the result is good or bad. Accurate and complete preparation of business and financial records is important so that we can make informed decisions. SI Group business records include, but are not limited to, inventories, tax filings, employee and payroll records, time sheets, expense reports, medical claim forms, purchase orders, invoices, test reports, performance measurements, production records, and performance reviews. Business records can also include emails, instant messaging, photographs, digital media, spreadsheets, and other documents related to business topics.

Employees are prohibited from attempting to circumvent processes or controls designed to ensure accuracy and are prohibited from withholding information from or obstructing investigations by internal or regulatory auditors. NO employee should consider misrepresenting facts or falsifying reports.

Whenever we are required to prepare business records, we must ensure accuracy and completeness



MAINTAINING BUSINESS AND FINANCIAL RECORDS

Q&A

QUESTION:

I went to lunch with my coworker and when we were finished eating she said she had to take care of a personal matter and asked if I could sign her back in. Can I do this?

ANSWER:

No, employee time sheets must be completed by the employee whose time is recorded and must accurately reflect the amount of time spent working. These records should honestly reflect the amount of work time the employee should be paid for working and must also represent accurate work/break time.

QUESTION:

I don't have time to check each invoice that comes across my desk. Isn't it the responsibility of the clerk who prepared it and the employee who submitted it to make sure an invoice is correct?

ANSWER:

We are all accountable for making sure all invoices and reports are filled out correctly. If you are approving an invoice, you are responsible for its accuracy.

QUESTION:

Does my supervisor have the authority to make me charge an incorrect amount on a work order or invoice?

ANSWER:

No, all employees are accountable for ensuring that, in the transactions they conduct or support, all charges are accurate and proper. Approval or request of a supervisor does not excuse a violation of SI Group policy. It is never acceptable to charge for a product or service that was not delivered or performed. You must report the incident using one of the reporting methods set forth herein.

CONFIDENTIALITY AND INTELLECTUAL PROPERTY

Protecting SI Group's confidential information and preserving intellectual property is vital to the success of our company. Employees may have access to secret or confidential information relating to SI Group and its business partners. Confidential information refers to any and all business information and materials of a confidential or proprietary nature, including trade secrets, business plans and proposals, sales forecasts, sales and marketing strategies, client and customer lists and account or contact information, pricing and pricing strategies, construction plans, supplier data, new business leads, specific areas of research and business development, product formulations and manufacturing processes, and personal information of employees.

All employees are obligated to protect this information and ensure that it is not disclosed or used in any manner beyond the scope of their responsibilities at SI Group. Confidential information may not be disclosed to any other third parties except those who have a legitimate "need to know" the information to fulfill a valid business purpose of SI Group and who have signed a confidentiality agreement with SI Group. Certain types of highly sensitive information and protected intellectual property of SI Group require the approval of the

appropriate manager or officer responsible for that information prior to any disclosure. Even among other SI Group employees, confidential information should not be shared unless there is a legitimate need to know the information to fulfill required job responsibilities. Employees must use confidential information only as allowed by law (such as data privacy laws which govern the use of personal information) and only for SI Group's benefit and not for an employee's own advantage or the advantage of others outside of SI Group.



CONFIDENTIALITY AND INTELLECTUAL PROPERTY (CONTINUED)

The confidentiality obligations and responsibilities continue after employment ends. In addition, confidential information or trade secrets from a previous employer should not be disclosed to SI Group or to other employees. Such disclosure would put both SI Group and the person disclosing the information at legal risk. However, this ban does not prohibit using general skills and knowledge acquired with previous employers while at SI Group.

In most places SI Group operates, employees are required to sign the Employee Innovation and Proprietary Information Agreement or a similar confidentiality agreement to acknowledge their obligation of confidentiality to SI Group. This Agreement protects the confidential and proprietary information of SI Group and provides a guideline for the type of information that may be considered secret and confidential. The Agreement also ensures that SI Group is fully able to make use of any inventions developed as a result of the employment of its personnel.

Notwithstanding the foregoing, employees shall not be held criminally or civilly liable under any Federal or State trade secret law for the disclosure of a trade secret that (A) is made (i) in confidence to a Federal, State, or local government official, either directly or indirectly, or to an attorney; and (ii) solely for the purpose of reporting or investigating a suspected violation of law; or (B) is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal. If an employee files a lawsuit for retaliation by SI Group for reporting a suspected violation of law, a trade secret may be disclosed to his or her attorney and used in the court proceeding, if the employee (A) files any document containing the trade secret under seal; and (B) does not disclose the trade secret, except pursuant to court order.



Every employee has the duty of confidentiality to the Company

CONFIDENTIALITY AND INTELLECTUAL PROPERTY

Q&A

QUESTION:

I am aware of my obligation to keep SI Group information confidential...

and not to make any formal disclosures of sensitive information during my conversations with customers or vendors. While I was at a friend's party over the weekend, I was talking to a coworker about how busy we were going to be at work once the acquisition of another chemical plant was finalized in the next month. Joe, who works at a competitor of SI Group, was standing nearby and overheard our conversation.

Have I violated my duty of confidentiality to the Company?

ANSWER:

Yes, the restriction on disclosure of confidential information applies not only to formal disclosure of the information, but also restricts informal conversations with friends and family, and conversations between employees in public places where the conversation can be overheard.

Employees must be proactive in preventing unintentional disclosure. If you find yourself in this situation, contact the Legal Department to remediate or limit future disclosures.

CONFIDENTIALITY AND INTELLECTUAL PROPERTY

Q&A

QUESTION:

I was browsing on Facebook and came across a post by another employee that included a discussion of SI Group products. When I read the post, I discovered that it included information that appeared to be confidential regarding the development of a new product and its applications.

What should I do?

ANSWER:

The use of social media is becoming an increasingly popular tool for marketing. Social networking can encourage open and relaxed communications. However, care must be taken when using social media so as not to violate SI Group policies and practices concerning the disclosure of confidential information. You should report a potential ethics violation using one of the methods set forth in this Code of Conduct.

QUESTION:

While working on research for a modification to an existing SI Group product, I discovered a chemical reaction that would lead to a new product that would have application outside of SI Group's current markets. I would like to try and sell this information to a company that has products in the field of application of this new product.

Can I do this?

ANSWER:

No, even though the new product would not have use or application to SI Group at this time, it was an invention that was made while working on SI Group products and while working as an SI Group employee. SI Group is the owner of that intellectual property.



GOOD CYBERSECURITY PRACTICES

Employees are responsible for protecting access to confidential and proprietary information. As we rely heavily on computer and portable electronic assets to meet operational, financial and compliance requirements, good cybersecurity practices are vital to protecting and preserving valuable information.

Cybersecurity is the responsibility of all employees, not just the IT Department. Regardless of whether you are conducting business on a company-owned device or a personal device, all employees are required to follow SI Group's Good Cybersecurity Practices, as well as any applicable local policies.

SI Group's Good Cybersecurity Practices require that employees:

- Only use software that has been properly licensed. The copying or use of unlicensed or "pirated" software on SI Group's computers or other equipment to conduct business is strictly prohibited.
- Never share user IDs or passwords or attempt to circumvent other information technology protections.
- Regularly secure SI Group equipment, and when not in use, keep equipment password-protected and in a safe location at all times. If a SI Group computer asset is lost or stolen, report the incident to SI Group IT immediately.
- Complete all Security Awareness trainings provided by SI Group and implement all recommended practices.
- Only conduct company business on authorized communication channels made available by the IT department. Use of unprotected communication tools such as Internet chat rooms or message applications (for example, WhatsApp or WeChat) for business related communications are strictly prohibited. Such unauthorized mediums do not allow for proper record retention and do not provide the required amount of security.
- Report suspicious behavior or unauthorized activity as quickly as possible.

Company technical resources may be used for personal use when it does not interfere with business operations or individual performance expectations. Be mindful that the company's technical resources may not be used for illegal or inappropriate uses including downloading inappropriate material, harassment, or offensive communications.

SI Group reserves the right to monitor individual electronics usage or perform routine systems checks against all SI Group issued equipment to ensure compliance with Good Cybersecurity Practices, subject to the requirements of applicable law. Any questions regarding cybersecurity practices or the safety of certain links or websites can be addressed by the Global IT Department.

OUR PEOPLE

SI Group considers its employees our most valuable asset. We strive to create a work environment that respects each individual and their unique talents. SI Group recognizes the intrinsic business value of promoting diversity in today's global workforce and is committed in that endeavor. We value the unique contribution that each person from a diverse background brings. We seek to create a place that you enjoy coming to every day, and we seek to be an employer that you are proud to work for. Our people are key to SI Group's success. We firmly believe that when we respect and value one another, we succeed both individually and collectively as a company.



DIVERSITY, EQUAL OPPORTUNITY, AND RESPECT

SI Group is an Equal Opportunity Employer and is firmly committed to equal employment opportunities and to compliance with all applicable laws that prohibit employment discrimination on the basis of the following non-exhaustive list:

Age, race, color, sex, sexual orientation, national origin, religion, disability, or any other status protected by the laws or regulations in the locations where we operate. This commitment applies to all employment decisions, including recruiting, hiring, training, job rotations, promotions, pay practices, benefits, disciplinary actions, and terminations.



We strive to create an environment that encourages employees to freely voice their opinions and concerns while maintaining respect for our diverse workforce. We are respectful of all cultural differences that come with our diverse workforce. Offensive messages, derogatory remarks, and inappropriate jokes are never acceptable.

DIVERSITY, EQUAL OPPORTUNITY, AND RESPECT

Q&A

QUESTION:

One of the employees in our workgroup frequently makes insensitive comments...

about the backgrounds and customs of a few of the members of our team. He thinks his comments are funny, but they are hurtful and affect the morale and productivity of our workgroup. Many in the workgroup are uncomfortable with the comments, but we're afraid of making matters worse if we tell him that his behavior is inappropriate.

What should we do?



ANSWER:

Ideally, the first step would be to inform the employee that his comments are offensive to members of the group and that such behavior is contrary to our policies of diversity and respect. However, if you are uncomfortable discussing the situation with the employee, you should follow the reporting procedures set forth in this Code. Also, you should encourage others who are offended by the remarks to report the offensive conduct.

DIVERSITY, EQUAL OPPORTUNITY, AND RESPECT

Q&A

QUESTION:

When frustrated, my supervisor often yells and points his finger in an aggressive way and makes inappropriate comments about people's competence. This behavior has reached the point where people are afraid of him. More and more people are calling in sick for work, and no one wants to speak out in team meetings for fear of being reprimanded for saying "the wrong thing." The overall work environment is very stressful.

What can I do?

ANSWER:

The general recommendation would be to tell the supervisor that his behavior is inconsistent with this Code's responsibility to foster teamwork through open and positive communication and our policy of respect. However, in this case it appears that such a conversation might be difficult. You should follow the reporting procedures set forth in this Code.



HARASSMENT AND BULLYING

SI Group is committed to providing employees with a comfortable work environment free of abuse and harassment. SI Group will not tolerate any actions that can be reasonably considered as intimidating or offensive, or any form of sexual harassment. Such actions can be direct or indirect, occur in or out of the workplace, and involve SI Group employees or non-employees. Actions that involve an SI Group employee and any employee of SI Group's customers, independent contractors, vendors, or other strategic partners may also constitute harassment or bullying and are strictly prohibited.

Conduct that can constitute unlawful harassment includes, but is not limited to:

- **Verbal conduct** such as epithets, derogatory jokes or comments, slurs or unwanted sexual advances, invitations, or comments
- **Visual conduct** such as derogatory and/or sexually oriented posters, photography, cartoons, drawings, or gestures
- **Written conduct** such as authoring threatening, sexually suggestive or obscene letters, correspondence (including emails, text messages, and social media posts), invitations, etc.
- **Physical conduct** such as assault, unwanted touching, blocking normal movement, or interfering with work because of sex, race, or any other protected characteristic
- **Threats and demands for sexual favors** as a condition of continued employment or to avoid some other loss, and offers of employment benefits in return for sexual favors
- **Retaliation** for having reported or threatened to report harassment



HARASSMENT AND BULLYING (CONTINUED)

Every SI Group employee should be alert to signs of harassment in the workplace. If you feel you are being harassed or think that another employee is being harassed, take appropriate actions to resolve the matter, such as reporting the incident or conduct to your direct supervisor/manager, unless local law requires you to follow a specific procedure for filing a complaint. If your supervisor/manager is the source of the harassment or you are otherwise uncomfortable discussing the situation with your supervisor/manager, you should immediately report the situation to Human Resources or the Legal Department unless otherwise provided in a local Anti-Harassment Policy. SI Group will promptly and thoroughly investigate any complaints of harassment.



You should not hesitate to report any conduct that is affecting your work environment. SI Group will not tolerate retaliation in any manner against any employee for opposing a discriminatory practice, making a good faith report of harassment, or participating in an investigation of alleged harassment.



SI Group will not tolerate any action that can be reasonably considered as intimidating or offensive, or any form of sexual harassment

HARASSMENT AND BULLYING

Q&A

QUESTION:

I can see that one of my colleagues is being picked on constantly by other team members. I want to raise this issue but I am concerned that it might be my turn next.

What should I do?

ANSWER:

You should always challenge inappropriate or unacceptable behavior that is impacting your work environment or that of a coworker. Begin by speaking to your direct supervisor/manager or local Human Resource Manager with the confidence that retaliation for reporting the matter will not be tolerated.

HARASSMENT AND BULLYING

Q&A

QUESTION:

My supervisor has not made specific advances toward me, but she stands very close to me and often touches me when speaking to me. She asked me to join her for drinks after work last week. I feel very uncomfortable, but don't want to jeopardize my job by bringing it up to anyone.

ANSWER:

If you feel uncomfortable in your work environment for any reason, you should bring this matter to someone's attention. Because it involves your direct supervisor, unless provided otherwise in the local Anti-Harassment Policy, you can speak to Human Resources or the Legal Department. Sexual harassment does not have to be overt to constitute a violation of the Code or the law. Actions that create an uncomfortable working environment may also constitute sexual harassment. Your complaint will be investigated and action will be taken if it is determined that improper actions have occurred. SI Group strictly prohibits retaliation for truthfully reporting actions that can be considered harassment, so you do not have to worry about your job.

QUESTION:

My coworker has pictures in his office of women wearing bikinis (or almost no clothing at all) and it makes me feel extremely uncomfortable whenever I have to go speak with him about a work project.

Can I make him take them down so I do not have to look at them every time I go to meet with him?

ANSWER:

You can try to discuss this matter directly with your coworker. Perhaps he does not realize that you feel uncomfortable and would agree to take the pictures down. If he does not agree to remove them or if you feel uncomfortable discussing this matter with him directly, you should report the situation to your direct supervisor. While it is acceptable for employees to express themselves and display pictures or artwork in their workspace that reflect their uniqueness and personality, it is not appropriate to display things that can reasonably be considered offensive or improper.

SUBSTANCE ABUSE IN THE WORKPLACE

The safety, health, and security of our employees are of primary concern to SI Group. Working under the influence of drugs or alcohol impairs your ability to perform your job and can cause serious harm to you and others. Employees are prohibited from being under the influence of any substance, drugs, or alcohol that could affect safety on the job. We do not permit the use, possession, manufacturing, distribution, dispensing, transportation, promotion or selling, or attempted selling of illegal or illicit drugs, controlled substances, or drug paraphernalia while on company time or on company premises or in SI Group-owned vehicles. Employees who operate equipment or machinery are prohibited from being under the influence of drugs or alcohol during work hours or while on call or paid standby. Employees driving in the course of their employment and/or using SI Group vehicles are required to comply with all applicable laws related to the consumption of alcohol before operating a motor vehicle, and must never operate a motor vehicle when their abilities are impaired.

It is understood that employees occasionally consume alcohol at events sponsored by SI Group or while socializing with SI Group business partners. On those occasions, employees who choose to consume alcohol must use good judgment and do so in a safe and responsible manner and in compliance with applicable policies and laws.

In order to enforce this policy and protect the safety of our employees, SI Group reserves the right to conduct drug and alcohol testing as permitted by local law. It is essential that you report any case of suspected substance use in violation of this policy to your direct supervisor/manager or local Human Resources representative. If you personally require help or counsel for alcohol or substance abuse, please contact your direct supervisor/manager or your local Human Resources representative and SI Group will direct you to professionals who can assist you.

**SI Group reserves
the right to
conduct drug
and alcohol testing
as permitted by
local law**



SUBSTANCE ABUSE IN THE WORKPLACE

Q&A

QUESTION:

I noticed that a coworker appears to be under the influence of alcohol or drugs at work.

What should I do?

**ANSWER:**

This is a serious situation. If possible, take a moment to observe your coworker's actions and behaviors so that you can describe the situation. Then, immediately contact the nearest supervisor or Human Resources representative and inform them of your concern and the behavior you observed. While the behavior may be the result of an illness or another cause, such an observation should always be reported immediately.

SUBSTANCE ABUSE IN THE WORKPLACE

Q&A

QUESTION:

I am not on call, but I have been asked to come into work to help address an emergency situation. I have had a few drinks with dinner.

Should I still come into work?

ANSWER:

No. SI Group is committed to keeping its people and facilities safe. If your judgment or physical abilities are impaired, then it is not safe for you to drive or make important decisions, and you should not do so.

QUESTION:

My colleague regularly arrives at work appearing to be under the influence of alcohol. I know he is having difficulties at home.

What should I do?

ANSWER:

It is important that you discuss the issue with your manager. The use of alcohol is likely to be affecting his well-being and the quality of his work, as well as creating a safety risk for himself and his coworkers. It is likely that your colleague needs help and support in dealing with his difficulties, and SI Group can direct him to resources to provide this assistance.



HEALTH AND SAFETY

SI Group is committed to preventing the incidence of work-related illness or injury. To achieve that goal, we have developed corporate-wide policies and procedures related to the safe operation of equipment, proper handling of materials, safe work practices, limits on exposure to potentially hazardous substances, and other matters affecting employee health and safety on the job. This includes Cardinal Safety Rules, which must be followed when performing certain job-related duties.

Strict adherence by all employees to these policies and procedures is a must. Protecting and promoting the health, safety, and well-being of SI Group employees is a top corporate priority worldwide. Our strategy for achieving that objective involves:

- **Establishing safe and healthy working conditions** that meet or exceed the applicable standards for occupational health and safety
- **Providing appropriate health and safety training and instruction to employees** and business partners who perform work at SI Group sites
- **Promoting health and safety** off the job for our employees and their families

Protecting and promoting the health, safety, and well-being of SI Group employees is a top corporate priority worldwide



HEALTH AND SAFETY

Q&A

QUESTION:

Do I have the authority, if I see something that I think is potentially dangerous or may cause injury, to tell the person or people doing it to stop?

ANSWER:

Everyone in SI Group has the authority to intervene and stop something that is potentially dangerous. If you think something is dangerous or may cause injury, you should say something to your colleague immediately to avoid any possible danger to your colleague or other SI Group employees. Any potentially dangerous situation that cannot be averted in this manner should be immediately reported using one of the reporting methods set forth in this Code.

HEALTH AND SAFETY

Q&A

QUESTION:

I know we're supposed to report injuries, job-related illnesses, and accidents, but my incident rate is a factor in my performance rating.

Should I delay or hold off on reporting incidents so I can get a higher performance rating?

ANSWER:

Absolutely not. We want every employee to report injuries, job-related illnesses, and accidents. It is only through such reporting that SI Group can respond to dangerous situations, measure and improve our safety performance, and uphold our commitment to health, safety, and the protection of our employees and the environment. According to both federal requirements and SI Group policy, employees have the absolute right to report work-related injuries and illnesses, and SI Group prohibits discrimination or retaliation against employees for reporting work-related injuries or illnesses. To protect all those working in SI Group facilities and those living in the communities in which SI Group operates, accurate and timely reporting is a necessity.

QUESTION:

Can I skip some required quality checks in order to make a production deadline?

ANSWER:

Do not skip the quality checks. If anyone asks you to skip quality checks or do something that you know is wrong, do not do it. If you are uncomfortable talking to your supervisor about the situation, immediately contact your site supervisor or site Environmental, Health & Safety (EHS) leader, or follow the reporting steps set forth in this Code of Conduct.

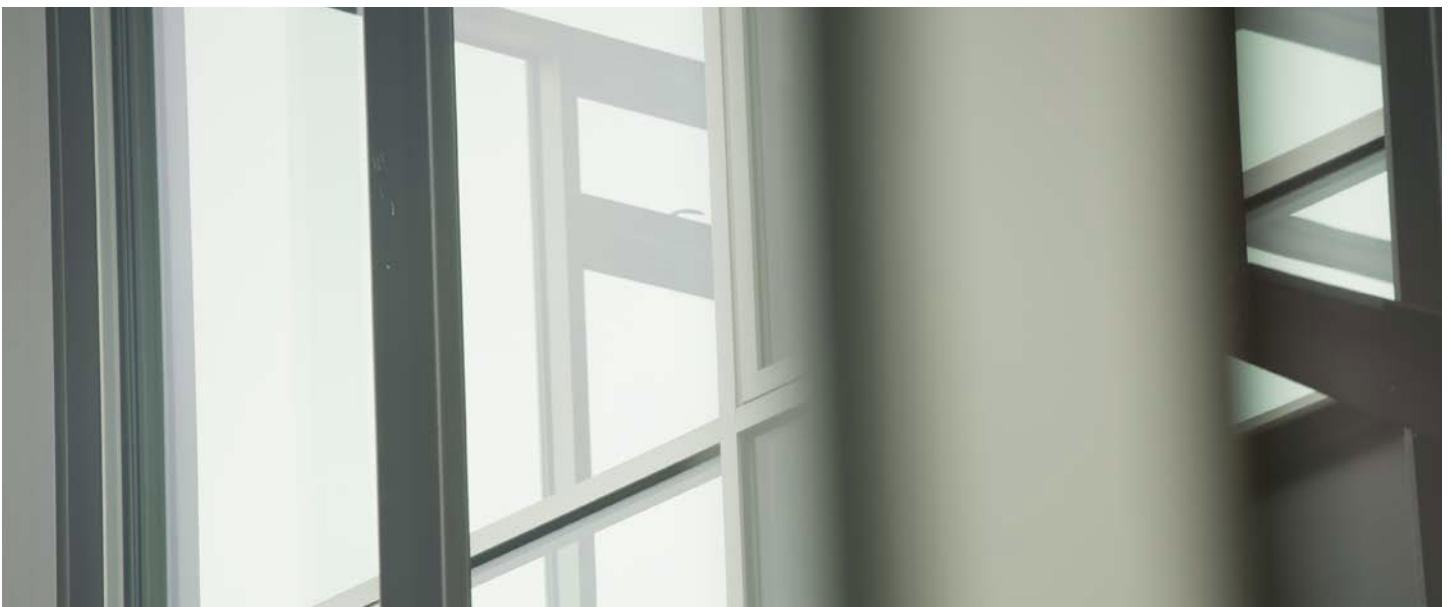
WORKPLACE VIOLENCE

SI Group is committed to preventing workplace violence and to maintaining a safe and secure work environment for all employees and guests. Acts or threats of physical violence, including intimidation, harassment, and/or coercion, that involve or affect SI Group, or occur on SI Group property or in the conduct of SI Group business off SI Group property, will not be tolerated.

Specific examples of conduct that may constitute threats or acts of violence include, but are not limited to, the following:

- Threats or acts of physical or aggressive contact directed toward another individual
- Threats or acts of physical harm directed toward an individual or his/her family, friends, associates, or property
- The intentional destruction or threat of destruction of SI Group property or another employee's property
- Harassing or threatening phone calls
- Surveillance
- Stalking
- Possession of weapons, or threat or implication of bringing weapons of any kind onto SI Group property
- Blatant or intentional disregard for the safety or well-being of others
- Veiled threats of physical harm or similar intimidation
- Any conduct resulting in the conviction under any criminal code provision relating to violence or threats of violence that adversely affects SI Group's legitimate business interests

Any SI Group employee who is the victim of violence, believes they have been threatened with violence, or witnesses an act or threat of violence should report the situation as soon as possible to their supervisor, manager, security personnel, or local Human Resources representative.



WORKPLACE VIOLENCE

Q&A

QUESTION:

What should I do if I see a potentially violent situation developing at work?



ANSWER:

If you see or hear anything that is threatening or carries the potential for violence, contact your direct supervisor/manager, your local Human Resources representative, or local security personnel immediately. **DO NOT** hesitate—act right away. Please do not attempt to intervene.

WORKPLACE VIOLENCE

Q&A

QUESTION:

The Company recently terminated the employment of one of my coworkers. She was visibly upset, and as she was packing up her personal belongings, she told everyone that she intended to “get even” with those who were responsible for her separation from the Company.

Is this something I should report?

ANSWER:

Yes. Immediately inform your supervisor, local Human Resources representative, or local security personnel about the comments.

LABOR POLICIES

We recognize and respect basic principles of human rights. We comply with all applicable labor and employment laws, including those respecting freedom of association, working conditions, and basic employee rights, wherever we operate. We believe that working positively and directly with employees best serves their interests.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

All employees shall be free to form and to join, or not to join, trade unions or similar external representative organizations and to bargain collectively. Information and consultation with employees can be done through formal arrangements or, if such do not exist, other mechanisms may be used.

COMPENSATION AND WORKING HOURS

SI Group believes in providing our employees with competitive wages and benefits that, at a minimum, comply with applicable law. SI Group strictly ensures that the working hours for our employees comply with applicable local laws regulating hours of work.

PROHIBITION OF CHILD LABOR

At SI Group we ensure that child labor is not used and that the minimum age of all employees complies with applicable local laws. No person shall be employed who is below the minimum legal age for employment.

PROHIBITION OF FORCED AND COMPULSORY LABOR AND DISCIPLINARY MEASURES

At SI Group we do not use forced or involuntary labor, and we ensure compliance with all applicable labor laws.



OUR CITIZENSHIP

We work with our local governments and surrounding communities to contribute to sustainable growth and job creation and to minimize negative impact on the environment. We strive to be a trusted and respected neighbor in the communities in which we operate and live, and we are committed to making positive change through protecting the environment.



PROTECTING THE ENVIRONMENT: SUSTAINABILITY

As a chemical company, we are aware of the risks and hazards that we face every day. SI Group is constantly striving to find sustainable solutions in the development, manufacture, and application of its chemical products. We take our Corporate Social Responsibility and commitment to sustainability and environmental protection very seriously. Safety, health, and environmental protection take priority over economic considerations. SI Group's continuity and success will be achieved only if we focus on making every decision with sustainable practices and the future in mind.

We are dedicated to protecting the environment and respecting the communities in which we operate. SI Group makes every effort to avoid damage to the environment and related impacts on our surrounding communities. Our EHS goals are ZERO (0-0-0): zero impacts on safety, the environment, and our brand.

Our corporate sustainability commitment requires us to:

- **Comply** with environmental laws and regulations applicable to our area of business
- **Ensure** that our products, operations, and behaviors adhere at all times to applicable governmental standards and SI Group environmental standards
- **Utilize** natural resources responsibly and to protect the environment of the communities in which we operate
- **Dispose** of waste in a socially responsible manner in compliance with all legal requirements. Third parties utilized by SI Group for disposal of waste on our behalf must also comply with environmental regulations and SI Group requirements



COMPLY



ENSURE



UTILIZE



DISPOSE



PROTECTING THE ENVIRONMENT: SUSTAINABILITY (CONTINUED)

All directors, officers, and managers have the duty to instruct, supervise, and support their team in understanding all applicable requirements for their department.

SI Group often exceeds minimum environmental legal requirements and constantly strives to improve procedures and processes to further minimize our environmental impact and prevent health risks. However, in the event that an incident or plant malfunction occurs, which has the potential to impact the environment, the Corporate EHS department must be immediately and comprehensively informed. The goal is to initiate the appropriate emergency response measures as promptly and as precisely as possible, communicate with governmental authorities and other stakeholders as appropriate, and provide the information required by law.

In addition, SI Group expects our suppliers and vendors to demonstrate, through their actions and business practices, a similar commitment to environmental protection, sustainability, and corporate social responsibility.

**SI Group
consistently
strives to improve
procedures and
processes to
further minimize
our environmental
impact**

At a minimum, we expect our third-party business partners to:

- **Comply** with all laws and treaties of the countries and regions in which they operate
- **Have established safety and environmental procedures** for the operation of their business
- **Have preventative maintenance and protective equipment** in compliance with the laws under which they operate
- **Comply with SI Group safety policies and procedures** while on our sites



SI Group continually reviews its relationships with third-party business partners as well as the due diligence processes used to evaluate their compliance with good business practices. If, during the course of the relationship, SI Group discovers that a third-party business partner is not meeting our requirements, SI Group will terminate the relationship and discontinue business with them.

PROTECTING THE ENVIRONMENT: SUSTAINABILITY

Q&A

QUESTION:

What is considered “safe” in our plants in this country...

may differ from what SI Group defines as “safe” in the United States. As long as plant environmental and safety measures in our country or region comply with local laws, can we consider them in compliance with the Code of Conduct?



ANSWER:

Not necessarily. At a minimum, we expect our employees and suppliers to comply with all laws and treaties of the countries and regions in which they operate; however, where local or regional laws are less stringent than SI Group corporate environmental, health, and safety policies, then SI Group’s more stringent policies will apply.

PROTECTING THE ENVIRONMENT: SUSTAINABILITY

Q&A

QUESTION:

Some of the overseas facilities in our supply chain may be in areas where there are no established environmental laws, and they handle local natural resources accordingly. Since they don't have laws requiring them to do otherwise, they aren't breaking any laws.

Does it matter?

ANSWER:

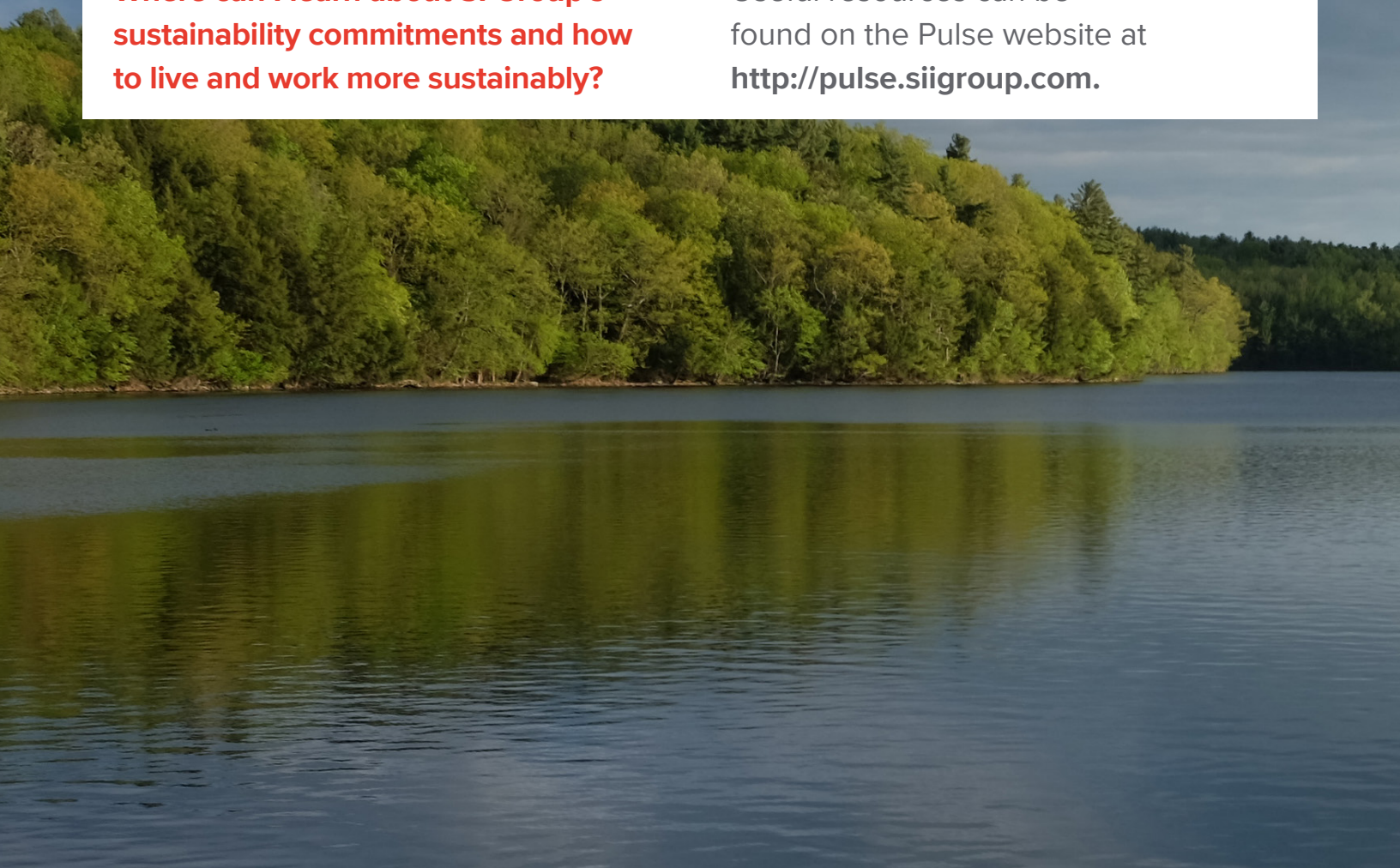
Yes, it does. We believe that all of us have a responsibility to respect, protect, and preserve the environment, whether legally required or not. We expect our business partners to join us in supporting environmental sustainability, using resources and energy efficiently, and minimizing our environmental impact wherever possible and appropriate.

QUESTION:

Where can I learn about SI Group's sustainability commitments and how to live and work more sustainably?

ANSWER:

Useful resources can be found on the Pulse website at <http://pulse.siigroup.com>.



CORPORATE SOCIAL RESPONSIBILITY

SI Group values the communities in which we operate and live. We encourage employees to participate in the local community, including the following activities:

- **Engaging in active dialogue with organizations** representing the communities where we do business
- **Participating in a variety of charitable endeavors** around the world ranging from financial contributions to donations of SI Group giveaways, such as T-shirts and other branded items, services, and other resources
- **Enhancing the quality of life in communities** in which we operate by supporting various charitable and philanthropic activities in arts, education, and human services, and encouraging our employees to donate their time and talent in our participating in these activities
- **Encouraging our employees to be engaged citizens** and to fulfill the civic duties of the nations and communities in which they live
- **Supporting initiatives that address the goals and needs of the community** and leveraging our abilities to support those communities
- **Encouraging our employees to support their personal communities** by participating in charitable activities on our own time

SI Group encourages our employees to be engaged citizens



POLITICAL ACTIVITIES AND CONTRIBUTIONS

Employees are free to engage in political activities on their own time, including making personal contributions in support of a candidate or political organization, volunteering in support of a candidate or political organization, or lobbying for or against a particular law or referendum. However, there are legal restrictions on corporate involvement in the political process. Therefore, employees must keep personal political activities separate from employment activities. Any personal political activity such as contributions, campaign activity, fundraising, etc. must not be connected to SI Group. This includes not expressing personal political views on SI Group letterhead or from a company email address. Further, company funding or resources may not be used to support any political candidate or party, unless it has been pre-approved within the guidelines of the ABC Policy.

SI Group may from time to time directly engage with political stakeholders and may provide contributions and other support to candidates whose policies align with SI Group's business plans as allowed by local law. Any such interactions must be approved in advance by SI Group's Legal Department.

**Any personal
political activity
must not be
connected to
SI Group**



POLITICAL ACTIVITIES AND CONTRIBUTIONS

Q&A

QUESTION:

When volunteering for a political campaign or publicly endorsing a candidate for political office...

is it OK for me to openly promote that I am an SI Group employee and that this candidate will best represent SI Group's interests?



ANSWER:

The short answer is no. SI Group supports employee participation in political activity, but individual political views are just that, individual. It is not appropriate for employees to indicate they represent SI Group unless they have been asked to do so by SI Group Government Affairs as part of their job responsibilities.

POLITICAL ACTIVITIES AND CONTRIBUTIONS

Q&A

QUESTION:

I received an invitation in the mail to attend a \$50 per plate fundraising lunch for a local politician running for office.

Am I allowed to attend?

ANSWER:

Yes. So long as you attend in your individual capacity, pay for it yourself, and do not create the perception that you are attending as a representative of SI Group, you may participate in the fundraiser.



COMMUNICATION WITH THE PUBLIC

We strive to communicate with the public in an accurate and consistent way.

To be sure that we comply with the law and protect our interests, only those who are specifically designated to do so should represent SI Group to the public or the media. All communications with the public on behalf of SI Group should be managed by SI Group's Global Communications Team.



COMMUNICATION WITH THE PUBLIC

Q&A

QUESTION:

An industry analyst called to ask for company comment regarding my area of responsibility at SI Group...

I knew the answer to the analyst's question, but it just didn't feel right, so I declined his request.

Did I do the right thing?

ANSWER:

Yes. You should never speak on SI Group's behalf to analysts, reporters, or anyone else outside of the Company unless it is your job to do so. Refer calls from reporters and analysts seeking comment from SI Group to our Global Communications team. They will determine the nature of our Company response and contact you if your involvement is required.

COMMUNICATION WITH THE PUBLIC

Q&A

QUESTION:

A local newspaper reporter contacted me seeking company comment about SI Group's plans for expansion in the area.

How should I respond?

ANSWER:

Unless you have been given the authority to speak about this topic on behalf of SI Group, you should refer the reporter to our Global Communications team.



USE OF SOCIAL MEDIA

Social media can be a powerful platform for networking, communicating, and brand enhancement.

As SI Group expands its presence on social media platforms, employees and contractors are encouraged to join and follow the Company. However, when communicating on subjects that involve the Company, and even those that do not, employees should remember that, even when not at work, others may still perceive employees as a representative of SI Group.



If you participate in on-line forums, blogs, newsgroups, chat rooms or bulletin boards, never give the impression that you are speaking on behalf of SI Group unless you are authorized to do so.

When using social media, you should follow the same principles expected in your other behaviors at work and outlined in this Code. For example, any harassment, bullying, discrimination, or retaliation that would not be permissible in the workplace is not permissible online either.

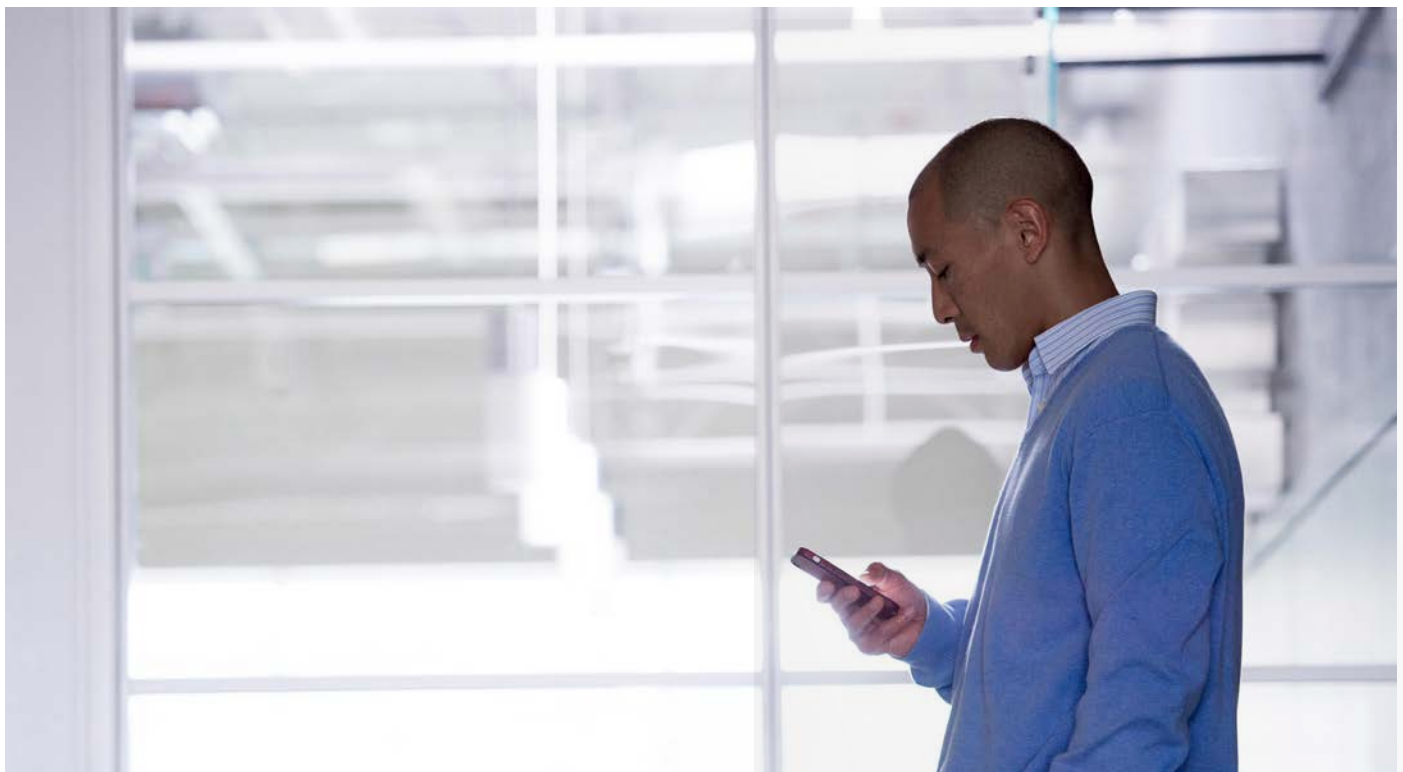
If you become aware of any misuse of social media related to SI Group's business or brand, please report the matter to the Global Brand and Communications Team or follow the reporting procedures set forth in this Code.

TAKE ACTION



MAKING DECISIONS AND SPEAKING UP

We all have a responsibility to make legal and ethical decisions in performing our jobs and to speak up if we see something unsafe, illegal, unethical, or potentially harmful. Any time you are uncertain of what action to take, you should not hesitate to discuss any potential legal and/or ethical issues or concerns you have with your direct supervisor/manager, local Human Resources representative, or SI Group's Legal Department. Any concern brought to our attention will be fully evaluated and, if necessary, we will investigate and take appropriate action to resolve the matter. No employee who brings forward a legal or ethical concern in good faith will be disciplined, and we will not tolerate retaliation against any employee for raising a concern or reporting a potential or actual violation.



MAKING DECISIONS AND SPEAKING UP (CONTINUED)

WHAT SHOULD YOU DO?

In making decisions during the course of your day, consider the following guidelines:

- Is there any particular law or SI Group policy which could be relevant to and/or govern the action I am considering?
- Should I ask for additional input before taking action?
- Have I thought this through carefully before taking action?
- Would I feel comfortable disclosing my decision to my supervisor, CEO, family, friends, etc.? (What if people found out?)
- Am I avoiding the appearance of impropriety?
- Am I defining the problem correctly so that I am considering the appropriate guidelines?
- Am I rationalizing my decision because it is the easy way out or benefits me personally?
- Finally, do I know who to contact if I need assistance in making my decision?



HOW TO REPORT A VIOLATION OF THE CODE OF CONDUCT

In the event you need to report a potential or actual legal, policy, and/or ethics violation, or even if you just need assistance with understanding the proper course of action, there are a number of options available, including:

- 1. Speak** to your direct supervisor/manager
- 2. Speak** to a manager outside your reporting lines, particularly if your supervisor or manager is the subject of your concern
- 3. Speak** to someone in your regional Human Resource Department
- 4. Speak** to SI Group's Legal Counsel
- 5. Make** a report, which in most countries can be anonymous, on the SI Group Living Our Values Hotline.

MAKING DECISIONS AND SPEAKING UP (CONTINUED)

WHAT TO EXPECT WHEN YOU USE THE LIVING OUR VALUES HOTLINE

The Living Our Values Hotline is available 24 hours a day, seven days a week. Trained specialists from an independent third party will answer your call, document your concerns, and forward a report to SI Group for further investigation. You also have an option to fill out an online report at the Living Our Values website.

Whether you use the Living Our Values Hotline or website, you may choose to remain anonymous where allowed by local law. All reports will be taken seriously and addressed appropriately, and any concern raised will be kept confidential to the fullest extent possible under the circumstances.

After you make a report on the Hotline or the website, you will receive an identification number that you can use to follow up on your concern. **Following up is especially important if you have submitted a report anonymously**, as we may need additional information from you in order to conduct an effective investigation. You can also use the identification number to track the resolution of the claim.



Information regarding
the Hotline can be found at
www.siigroup.com/LivingOurValues

INVESTIGATION AND RESPONSE

The Code of Conduct is vitally important to the success of SI Group, and as such receives the highest priority in its consideration and enforcement. Any report of a potential violation of this Code of Conduct must be made in good faith and have reasonable grounds for belief that a violation may have occurred. Good faith reports of potential violations of this Code of Conduct will be taken seriously and promptly investigated. Input will be obtained from relevant subject-matter experts depending on the nature of the potential violation.

Investigations will be conducted in a way that is respectful, confidential, and fair. All employees have a duty to cooperate in an investigation. All personal information disclosed during the investigation, including the identity of the complainant, will be kept confidential, except as necessary or appropriate to disclose for the purpose of the investigation or where required by law. When possible, feedback on the results of the investigation will be provided to the employee reporting the violation. However, there are certain situations, especially those involving personnel actions, where communicating information back to the reporting employee is not appropriate because of privacy concerns.

Employees involved in an investigation must always present the facts fully and honestly and must not mislead investigators or fail to disclose information, even if they think the result of being completely honest will be negative. Employees should never alter or destroy records in response to an

investigation, or when an investigation is anticipated.

If the investigation substantiates an allegation, the appropriate management team will review the findings and determine the appropriate action, which may include disciplinary proceedings against the violator, up to and including termination of employment. Additionally, certain violations may be referred to legal authorities for investigation and civil or criminal prosecution.

Any employee who fails to cooperate in an investigation of a suspected violation, or any employee that is found to have made a baseless, reckless, malicious, or deliberately false allegation, shall be subject to disciplinary proceedings, up to and including termination. Furthermore, any retaliatory actions taken against another employee for reporting a suspected violation or for participating in an investigation will be subject to disciplinary action, up to and including termination.

ANTI-RETALIATION POLICY

Employees are required to report suspected violations of this Code of Conduct and related policies and guidelines.



Employees must feel comfortable in reporting ethics issues or raising questions in ethical dilemmas. SI Group will not tolerate acts of intimidation, threats of violence, or discrimination of any employee for the purpose of interfering with or retaliating against an employee for filing a complaint, asking a question, or participating in an investigation. If you suspect retaliation against yourself or any other SI Group employee for speaking up, report your concern immediately using one of the reporting methods set forth herein.

OUR COMMITMENT

SI Group is committed to providing all employees with training, tools and resources to succeed with understanding the requirements of our Code of Conduct. In addition to this document, we provide periodic online training on specific topics, as well as in-person trainings.

If you have any questions about your obligations as an SI Group employee, please reach out to HR or Legal for guidance.



CODE OF CONDUCT CERTIFICATION



1. I have read and I understand the Code of Conduct (“Code”). I agree to abide by the requirements of the Code, and if I have any questions concerning the meaning or application of the Code I will raise them with my direct manager, Human Resources, or SI Group’s Legal Department.
2. Except as described below, I have complied with the Code, and to the best of my knowledge and good faith belief all other Directors, Officers, and SI Group employees have complied with the Code, at all times during the preceding calendar year and up to and including the date of this certification.

Exceptions (please describe, or write “none” if applicable): _____

3. I understand that the content of this Code and any applicable rule, regulation, policy, or procedure may be amended at any time by SI Group.
4. I understand that failure to comply with the Code and complete this Certification may result in disciplinary action up to and including termination.

Date: _____ Sign Here: _____

Print Name: _____

www.siigroup.com/LivingOurValues



www.siigroup.com

SI Group, Inc.

Corporate Headquarters
2750 Balltown Road
Schenectady, NY 12301, U.S.A.
Tel: +1 518.347.4200

The information presented herein is believed to be accurate and reliable, but is presented without guarantee or responsibility on the part of SI Group, Inc. and its subsidiaries to ensure the accuracy or reliability of the information. It is the responsibility of the user to comply with all applicable laws and regulations and to provide for a safe workplace. The user should consider all information contained herein only as a guide, and should take precautions that the user considers necessary or prudent to promote a safe work environment, such as considering all applicable health and safety hazards, developing safe work practice procedures and properly instructing employees. Further, nothing contained herein shall be taken as an inducement or recommendation to manufacture or use any of the materials or processes mentioned herein in violation of existing or pending patents.