

CODE OF CONDUCT



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CEO STATEMENT



Innospec places the strongest emphasis on maintaining high standards of corporate governance and integrity in every aspect of its business activities.

The Innospec Code of Conduct (our **“Code”**) is founded on our core values: responsible growth, caring for people, conserving and protecting the environment and leading by example. Our core values and commitment to acting with honesty and integrity are essential to building trust and maintaining relationships with our customers, suppliers and partners.

Compliance with our Code and applicable laws and regulations is expected and required of all of us. Our Code puts into words the way in which we should all act in every decision that we make and helps us

to remain accountable by sharing the company’s expectations.

When it comes to compliance, there can be no compromises. Please take the time to read, understand and comply with this important document.

Thank you for your commitment and support.

A handwritten signature in black ink, appearing to read 'P. Williams', with a small dot at the end.

Patrick S. Williams

President and Chief Executive Officer
Innospec Inc.

OUR CODE

Innospec Inc. including all of its subsidiaries and affiliated companies (“**Innospec**”) believes that lawful, honest, ethical and transparent business conduct is vital to its continued success.

Our Code serves as a valuable resource to help us make lawful and ethical decisions in carrying out business activities. Following our Code and internal policies protects Innospec and each one of us.

Innospec operates in complex regulatory environments and is committed to observing both the letter and the spirit of the laws of the countries where it is located or conducts

business. In any situation not clearly governed by statute or regulation, or where the law is ambiguous or conflicting, Innospec’s business will be conducted in accordance with the highest standards of ethics and integrity.

Any questions should be raised with Innospec’s Senior Vice President, General Counsel and Chief Compliance Officer or the Legal Compliance team (collectively “**Legal Compliance**”).

WHO MUST FOLLOW OUR CODE?

Our Code applies to the Innospec Inc. board of directors and every officer, director, employee (permanent and temporary) and contract employee of each Innospec company (collectively “**Employees**”).

Employees have personal responsibility to comply with our Code, with Innospec’s policies and with all applicable laws and regulations. Innospec board members, officers, directors and senior managers are also expected to demonstrate leadership on ethical matters, to observe the highest standards of ethical conduct and to promote open and honest communication.

Our Code sets out the standards required of third parties, such as agents, distributors, consultants and joint venture partners, who are acting for or on behalf of Innospec (“**Third Party Representatives**”). We also expect our customers, suppliers and other business partners (“**Stakeholders**”) to adhere to the principles contained in our Code.

Failure to abide by our Code may lead, in the case of Employees, to disciplinary measures up to and including dismissal and, in the case of board members, Third Party Representatives and Stakeholders, to termination of their relationship with Innospec.

INNOSPEC'S **CORE VALUES**

Our core values help us maintain the highest standards of corporate governance and integrity in every aspect of our business activities.



Responsible Growth through Innovation and Customer Service

Financial stability and growth are essential to maintain our commitment to making a positive contribution towards a more sustainable future. Generating economic benefits for our Employees, shareholders and local communities – encouraging ongoing innovation in our product portfolio alongside excellent customer service will ensure our business continues to be competitive and sustainable.



Caring for People

We strive to create a safe and caring culture where our Employees are supported and encouraged to make positive contributions. Our continued success depends on keeping people safe, promoting a healthy lifestyle, protecting human rights, improving education, training and maintaining good relations with our neighbors.



Conserving & Protecting the Environment

We are committed to using resources as efficiently as possible and minimizing the impact of our operations on the environment. We look to supply safe, sustainable products, designed to meet the needs of society now and in the future while minimizing their environmental impact.



Leading by Example

We understand that honest, ethical and transparent conduct is vital to our success and reputation. Every Employee plays an essential part in complying with local and national laws, rules and regulations. We uphold a high standard of corporate and business integrity across all of our activities.

WHEN IN DOUBT

When in doubt, you should consider:



REPORTING CONCERNS

An integral part of our culture is the creation of an environment in which concerns regarding unlawful, fraudulent or unethical matters may be raised without fear of retaliation.

Innospec's Employees, Third Party Representatives and Stakeholders may report concerns by emailing **Legal.Compliance@Innospecinc.com** or by making a report through our whistleblowing hotline, **EthicsPoint** (see below). Other reporting mechanisms are also available – see Innospec's **Reporting Corporate Governance Concerns Policy and Procedures**.

I AM AN EMPLOYEE – WHO CAN I SPEAK TO?

Can you speak to your line manager about your concern?



Can you speak to your head of department or another senior manager?



Can you contact a relevant subject matter expert or supporting function (e.g. HR or Legal Compliance) about your concern?



If none of these options work for you, contact EthicsPoint.

I AM A THIRD PARTY REPRESENTATIVE OR STAKEHOLDER – WHO CAN I SPEAK TO?

Can you speak to your primary Innospec contact about your concern?



Can you speak to your Innospec contact's manager or head of department?



Can you contact Legal Compliance about your concern?



If none of these options work for you, contact EthicsPoint.

Employees, Third Party Representatives and Stakeholders may also have rights, under applicable whistleblowing laws (such as the EU Whistleblowing Directive 2019/1937), to report breaches of law to government-designated authorities, including law enforcement and other government, regulatory and self-regulatory agencies.

The reporting mechanisms described are not for general enquiries or complaints that do not involve concerns about unlawful, fraudulent or unethical matters. Such general enquiries and complaints should be directed to your Innospec manager, regular contact or local Innospec office.

EthicsPoint

EthicsPoint is a whistleblowing hotline that is operated for Innospec by an independent third party. There is the option (if local laws permit) to report a concern anonymously. It is available 24/7/365, for the reporting of concerns in multiple languages by telephone (see Innospec's **Reporting Corporate Governance Concerns Policy and Procedures**).

Additional information:

Innospec's **Reporting Corporate Governance Concerns Policy and Procedures** is available on its website - [click here](#) to review. Employees can also access it on Innospec's Intranet.



1. Responsible Growth

1.1 Conflicts of interest

Business decisions and actions must be in Innospec's best interests, in compliance with all applicable laws, regulations and rules and must not be motivated by personal considerations or relationships.

Your responsibilities:

- Any outside activity must be strictly separated from employment with Innospec and must not harm Innospec's interests or its business. Employees must not, without prior approval from Legal Compliance:
 - engage in any business or other activity, in an employed, self employed, paid or unpaid capacity, which may give rise to a conflict, or be in competition, with Innospec's interests; or
 - work for, serve on the board of or receive payments for services from, any customer, supplier or competitor of Innospec or a government organization.
- Decisions made on behalf of Innospec should be of sound judgment and independent of any personal relationships, including with prospective, current or past Employees, family members or friends, customers or suppliers.
- You must never use your position at Innospec or its assets, information or resources for personal gain or in conflict with your duties to Innospec.
- You must not allow your investments to influence, or appear to influence, any judgment made on Innospec's behalf (which should remain independent).
- You must disclose to Legal Compliance any situation, material transaction or relationship that may, or could appear to, be a conflict of interest. When in doubt, it is best to disclose.

1.2 Confidentiality and protection and use of Innospec's property

Innospec's property must be used responsibly and be appropriately protected.

Special care needs to be taken to protect confidential information and intellectual property. Examples of confidential information and intellectual property are:

- *financial results before they are in the public domain;*
- *trade secrets, including any business or technical information;*
- *product formulations, manufacturing processes, test results and research;*
- *proprietary information such as prices or customer sales lists; and*
- *any transaction that Innospec is or may be considering which has not been publicly disclosed.*

Ensuring the confidentiality, integrity and availability of Innospec's IT systems and data is vital.

Your responsibilities:

- You must always protect Innospec's property and assets and use them efficiently and properly.
- You must act appropriately to help make sure that company assets are not damaged, misused, stolen or lost.
- Innospec property must not be used for personal reasons unless (and to the extent) expressly permitted by the relevant Innospec policy or procedure.
- You must not share Innospec information in public forums or on social media without authority to do so.
- You must keep Innospec's confidential information strictly confidential and not disclose it to any third party without appropriate safeguards being in place.
- You must take care with confidential information belonging to third parties and comply with the terms of all confidentiality, non-disclosure and other agreements.

- Employees must follow all IT policies, processes and security requirements and adequately and appropriately secure all IT assets against potential threats.
- Employees must be vigilant against cyber-attacks and scams such as phishing and report immediately any incidents, including potential or actual losses of Innospec information or assets.

Additional information:

Employees can access Innospec's **IT Policies** on Innospec's Intranet.

1.3 Fraud, money laundering and criminal conduct

Innospec is committed to the elimination of fraud (including money laundering, tax evasion and other financial crime) and other criminal offenses, to the rigorous investigation of any suspected wrongdoing and, where fraud or any other criminal act is discovered, to make sure that matters are appropriately handled and reported.

This includes the elimination of fraud within the Innospec business and of the facilitation of fraud committed by associated persons (including Third Party Representatives and Stakeholders). Examples of fraud include:

- *theft or misuse of property;*
- *abuse of a position of trust;*
- *deception or falsification of records or results (e.g. fraudulent financial reporting, time-recording or expense claims);*
- *forging a signature or identity theft;*
- *illegal non-payment or under-payment of tax (e.g. tax evasion);*
- *back-dating of documents;*
- *concealment of illegally obtained funds; and*
- *computer fraud (e.g. hacking, phishing).*

Money laundering is the concealment of the origins of illegally obtained money, typically by means of transfers involving legitimate businesses.

Tax evasion is the deliberate attempt not to pay tax which is due.

Your responsibilities:

- You must never become involved in fraud, money laundering or other criminal conduct.
- Business transactions on behalf of Innospec must not involve acquiring, using or holding money or property acquired through crime.
- You must follow all applicable tax regulations and accurately declare income, profits, expenses and other financial matters.
- Employees must abide by and follow Innospec's finance, tax and credit policies and processes.
- Employees must know who Innospec is doing business with by following Innospec's due diligence, screening and "know your customer" processes.
- If you know or suspect that fraud, money laundering, tax evasion or any other offense involving or relating to Innospec or Innospec's business, is being or has been, committed then you should report your concerns immediately.

Additional information:

Innospec's **Reporting Corporate Governance Concerns Policy and Procedures** is available on its website - [click here](#) to review. Employees can also access it on Innospec's Intranet.

1.4 Competition and anti-trust

*Innospec competes vigorously for business and in doing so is committed to complying with all applicable competition and anti-trust laws ("**Competition Laws**").*

Competition Laws operate to protect business and consumers, and to preserve and promote honest, open and fair competition. Violation of Competition Laws can have serious consequences.

Examples of illegal anti-competitive behavior include:

- *agreements that restrain trade;*
- *price fixing and bid-rigging;*
- *allocating markets and customers;*

- *boycotts (e.g. agreement between two or more parties to deny business or other competitive advantages to a third party);*
- *fixing re-sale prices; and*
- *abusing market dominance (e.g. refusal to supply).*

Your responsibilities:

- You must not engage in practices that violate Competition Laws.
- You must not agree with competitors (even informally):
 - to fix prices or any element of prices including discounts, surcharges or credit terms;
 - to refuse to deal with suppliers or customers;
 - to limit output, production or supply; or
 - to fix or rig bids or tenders.
- You must not attempt to set or agree a fixed or minimum re-sale price for any distributor or re-seller.
- You must not share, receive or discuss competitively sensitive information without a lawful reason.
- You must be vigilant in not entering into any kind of in-appropriate conversation or agreement with competitors.
- Employees must comply with Innospec's Competition Law and Anti-Trust Policy.
- Employees who participate in trade association activities must abide by the rules set out in Innospec's Competition Law and Anti-Trust Policy.
- If you know or suspect that Competition Laws are being or have been broken, you should report your concerns immediately.

Additional information:

Employees can access Innospec's **Competition Law and Anti-Trust Policy** on Innospec's Intranet.

Innospec's **Reporting Corporate Governance Concerns Policy and Procedures** is available on its website - [click here](#) to review. Employees can also access it on Innospec's Intranet.

1.5 Public disclosures

Innospec commits to communicate effectively with shareholders and investors so that they are promptly provided with full and accurate information in all material respects regarding Innospec's financial condition and business operations.

Innospec's public communications, including reports and documents filed with or submitted to government agencies, will be timely and must demonstrate full, fair, accurate and understandable disclosure.

Your responsibilities:

- You must not disclose information about Innospec's business activities unless you are authorized to do so.
- All information you give must be true, accurate, consistent and not misleading.
- Do not share Innospec information on public forums or on social media unless authorized to do so.
- Only authorized persons can talk to the media or investment community.

1.6 Stock trading

Innospec is committed to complying with all applicable securities laws and regulations.

Your responsibilities:

- Whilst trading in Innospec's publicly traded stock, Employees must comply with Innospec's Stock Trading Policy including all approval and reporting obligations.
- There must be no buying or selling of such stock by anyone in possession of material non-public information.

Additional information:

Employees can access Innospec's **Stock Trading Policy** on Innospec's Intranet.



2. Caring for people

2.1 Human rights

Innospec is committed to human rights and supports the principles of the United Nations' Universal Declaration of Human Rights, the United Nations' Guiding Principles on Business and Human Rights, the International Labor Organization Principles and the United Nations' Global Compact.

Innospec is committed to compliance with applicable laws on working time, paid leave and benefits and proper treatment of our Employees.

Your responsibilities:

- You must act in accordance with human rights laws and regulations.
- You must act in a fair, ethical and lawful manner towards communities, Stakeholders, colleagues and investors to prevent adverse impacts on human rights.
- You are expected to show respect and consideration for others in all business dealings.
- Employees, Third Party Representatives and Stakeholders are expected to adhere to the principles in Innospec's Human Rights Statement and maintain the high ethical standards described.
- If you know of, or suspect, a potential human rights violation you should report your concerns immediately.

Additional information:

Innospec's **Human Rights Statement** is available on its website - [click here](#) to review.

Innospec's **Reporting Corporate Governance Concerns Policy and Procedures** is available on its website - [click here](#) to review. Employees can also access it on Innospec's Intranet.

2.2 Modern slavery

Modern slavery takes various forms, including forced, compulsory, bonded and child labor and human trafficking.

Innospec fully supports the elimination of all forms of slavery and human trafficking and will not tolerate any form of unacceptable treatment of workers.

Violation of modern slavery laws could constitute a material breach of contract.

Your responsibilities:

- You must at all times comply with all applicable laws, regulations and rules to avoid any act of modern slavery.
- You should be especially conscious of red flags and warning signs in the supply chain.
- If you know of, or suspect, a potential violation in relation to modern slavery in any part of Innospec's business or supply chain anywhere in the world you should report your concerns immediately.

Additional information:

Innospec's **Modern Slavery Statement** is available on its website - [click here](#) to review.

Innospec's **Reporting Corporate Governance Concerns Policy and Procedures** is available on its website - [click here](#) to review. Employees can also access it on Innospec's Intranet.



3. Conserving and Protecting the Environment

3.1 Safety, health and the environment

Innospec is committed to the protection of the environment, the safe supply of products and the health and safety of its Employees and others who may be affected by our activities.

Innospec strives to achieve best industry practices and continuous improvement in the provision and maintenance as far as is reasonably practicable, of safe plant, procedures and systems at work.

Innospec seeks to use resources as efficiently as possible, promoting sustainable consumption and minimizing the impact of our operations on the environment.

Your responsibilities:

- You must comply with all applicable legal and regulatory requirements pertaining to safety, health and the environment.
- Employees and anyone on Innospec's sites must comply with applicable Innospec safety, health and environment policies, instructions, standards and procedures.
- You must act positively and encourage others to prevent injury, ill health, damage and loss arising.
- You must know, and comply with, the emergency procedures that apply to your location.
- Play your part in protecting the environment. Use resources efficiently, minimizing waste as much as possible.
- You must act and report any incident or potential incident (including a near miss) as soon as you become aware of it.

Additional information:

Innospec's **Safety, Health and Environment Policy** is available on its website - [click here](#) to review.

Employees can access further safety, health and environment policies on the SHE section of Innospec's Intranet.



4. Leading by Example

4.1 Anti-bribery and corruption

Innospec does not tolerate bribery and corruption in any form in its business. We comply with all applicable laws prohibiting corruption and bribery and support efforts to eliminate bribery and corruption.

Your responsibilities:

- You must comply with applicable anti-corruption laws and Innospec's Anti-Corruption Policy.
- You are prohibited (directly or indirectly) from offering, giving or receiving anything of value (including bribes or kick-backs) which is intended to improperly obtain or retain business, to secure an improper advantage in conducting business or to induce the recipient to perform a function improperly.
- You must not make "facilitating" or "grease" payments (e.g. payments made to speed up a transaction or process) for routine action by government officials.
- Employees must only appoint or work with Third Party Representatives that have been approved pursuant to the Third Party Representative Legal Compliance Approval User Guide.
- Accurate books and records must be maintained, detailing every expenditure of funds or anything relating to Innospec business.
- If you know of, or suspect, a potential violation of anti-corruption law or Innospec's Anti-Corruption Policy, you should report your concerns immediately.

Additional information:

Innospec's **Anti-Corruption Policy** is available on its website - [click here](#) to review.

Innospec's **Reporting Corporate Governance Concerns Policy and Procedures** is available on its website - [click here](#) to review. Employees can also access it on Innospec's Intranet.

4.2 Political activity and government officials

Innospec often conducts business with governments and government-owned enterprises and interacts with government agencies, officials and public international organizations. Innospec will apply the highest ethical standards and comply with all applicable laws, regulations and rules to such dealings.

Your responsibilities:

- You must apply the highest ethical standards when dealing with government officials and you must comply with all applicable laws, regulations and rules including Innospec's Anti-Corruption Policy.
- Innospec's funds or assets must not be contributed to any political party or organization, or to any individual who either holds public office or is a candidate for public office, without authorization from Legal Compliance.
- You must always make it clear that the political views you express or represent or actions that you take are your own and not those of Innospec.
- Personal political activities or positions can sometimes create a conflict with Innospec, if relevant you must talk to your line manager or Legal Compliance.

Additional information:

Innospec's **Anti-Corruption Policy** is available on its website - [click here](#) to review.

4.3 Third Party Representatives

Innospec is committed to only doing business with reputable Third Party Representatives who have not engaged, and will not engage, in unlawful or unethical business practices.

Third Party Representatives are third parties, such as agents, distributors, consultants and joint venture partners, who are acting for or on behalf of Innospec.

Innospec conducts rigorous due diligence prior to the appointment or renewal of a Third Party Representative.

Third Party Representatives must comply with anti-corruption laws and Innospec's Code of Conduct and Anti-Corruption Policy.

Your responsibilities:

- Employees must only work with reputable Third Party Representatives that have been approved pursuant to the Third Party Representative Legal Compliance Approval User Guide.
- Third Party Representatives must meet the standards set out in this Code and Innospec's Anti-Corruption Policy and comply with applicable laws and the terms of the agreements they have with Innospec.
- It is the responsibility of Employees to monitor the actions of Third Party Representatives and promptly report any "red flags" or concerns to Legal Compliance.

Additional information:

Employees can access Innospec's **Third Party Representative Legal Compliance Approval User Guide** on Innospec's Intranet.

Innospec's **Reporting Corporate Governance Concerns Policy and Procedures** is available on its website - [click here](#) to review. Employees can also access it on Innospec's Intranet.

4.4 Gifts, hospitalities and other benefits

Innospec acknowledges that in many countries, gifts and hospitalities play a role in building business relationships.

Problems can arise when such customary courtesies create opportunities for bribery, undue influence and other misuse. Similarly, charitable donations and sponsorships may raise corruption risks in certain circumstances.

*Innospec is committed to complying with all applicable laws prohibiting bribery and corruption and, to make sure that gifts, hospitalities, donations and sponsorships are given or received legally and appropriately, Innospec requires Employees to comply with its Gifts, Hospitalities, Charitable Donations and Sponsorships Policy ("**G&H Policy**").*

Your responsibilities:

- Employees must comply with Innospec's G&H Policy (including all reporting and approval requirements) in relation to all gifts, hospitalities, meals, donations and sponsorships ("**Benefits**") offered, given or received.
- No Benefit may be offered, given or received which is intended to improperly obtain or retain business, to secure an improper advantage in conducting business or to induce the recipient to perform a function improperly.
- All Benefits offered, given and received must be of a professional nature, for a legitimate business purpose and be both reasonable and appropriate in terms of value and frequency.
- Employees must not (either directly or indirectly) offer, give or receive Benefits that exceed the prescribed value limits set out in the G&H Policy.
- No cash gifts, including vouchers, gift cards or loans must be offered, given or received under any circumstances.
- All Benefits offered or given must comply with the terms of relevant third party contracts or policies.
- All expenses incurred by Employees pursuant to the G&H Policy must be submitted in accordance with the relevant Innospec expense policy and include receipts and required G&H Policy reporting forms.

Additional information:

Employees can access Innospec's **Gifts, Hospitalities, Charitable Donations and Sponsorships Policy** on Innospec's Intranet.

4.5 Export control and trade sanctions

Innospec is committed to complying with all relevant economic and financial sanctions, trade embargoes, restrictive measures and unlawful boycotts (“**Export Controls and Sanctions Laws**”).

Your responsibilities:

- You must not engage in practises that violate any Export Controls and Sanctions Laws.
- You must obtain an export license prior to export of controlled products.
- You must not trade with sanctioned parties or territories in relation to Innospec products.
- Employees must comply with Innospec’s Export Controls and Trade Sanctions Policy and related policies and processes.
- Employees must fully understand all business transactions in which they are involved including the products involved, the intended purpose/end-use and which entities and territories are involved in the transaction.
- Employees must properly screen all third parties using Innospec’s designated screening software to prevent trade with sanctioned parties.
- Employees involved in transactions within sensitive territories (set out in the Export Controls and Trade Sanctions Policy) must take extra precaution and follow the additional guidance in the Policy.
- Employees must not participate in unlawful boycotts. Any such requests must be reported to Legal Compliance.

Additional information:

Employees can access Innospec’s **Export Controls and Trade Sanctions Policy** on the Intranet.

4.6 Conflict minerals

Innospec is committed to the responsible sourcing of materials and to complying with all applicable legislation relating to conflict minerals.

Conflict minerals are certain metals, typically gold, tantalum, tin and tungsten and their ores, which finance armed conflict or are mined using forced labor.

Innospec conducts an annual review of its use of conflict minerals and publishes its statement on conflict minerals on its website.

Your responsibilities:

- Employees must comply with the requirements of the Conflict Minerals Policy when sourcing goods.
- As set out in Innospec’s Supplier Code of Conduct, Innospec expects its suppliers to share its commitment to responsible sourcing, by supplying materials, products and components that are conflict free and requiring their own suppliers to adopt similar policies, systems and socially responsible sourcing practises.
- Suppliers are expected to adopt policies and systems that are consistent with relevant conflict minerals laws.
- Suppliers are also expected to respond to Innospec’s enquiries and provide certifications upon request.

Additional information:

Employees can access Innospec’s **Conflict Minerals Policy** on the Intranet.

Innospec’s **Conflict Minerals Statement** is available on its website - [click here](#) to review.

Innospec’s **Supplier Code of Conduct** is available on its website - [click here](#) to review.

4.7 Data protection

Data protection laws safeguard information about individuals (personal data). Innospec has obligations under various data protection laws regarding how it deals with the personal data that it holds, what it does with that data and who the data is shared with.

Innospec is committed to complying with all applicable data protection laws and will only use personal data when needed to operate effectively or comply with the law.

Examples of personal data include:

- names;
- addresses;
- dates of birth;
- nationalities;
- contact details;
- bank account information;
- job titles;
- CVs;
- CCTV images; and
- data gathered from website cookies.

Your responsibilities:

- You must not engage in practises that violate data protection laws.
- Employees must comply with Innospec's Data Protection Policy.
- Personal data must be:
 - processed lawfully, fairly and in a transparent manner;
 - processed only for the specified and legitimate purpose it was collected for;
 - relevant and limited to what is needed in relation to the purpose for which it is processed;
 - kept accurate and up to date;
 - kept for no longer than necessary; and
 - kept secure.
- Do not share personal data with third parties without necessary consent or other legal basis for sharing and contractual safeguards.

Additional information:

Employees can access Innospec's **Data Protection Policy** and **Employee Privacy Notice** on the Intranet.

Innospec's **Third Party Privacy Notice** is available on its website - [click here](#) to review.

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Latest version: www.innospec.com/about-us/corporate-governance/