



Code of Conduct

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A Message from the CEO

At Qnity, how we work is just as important as what we achieve. Our Code of Conduct is grounded in three non-negotiables: safety, integrity, and respect. These are the principles we live by, reflected in every interaction we have and every environment we create. They're not optional — they're the foundation of our culture and the standard we hold ourselves to, every day.

We also embrace a bold set of values: Customer, Innovation, Speed, and People. These values are more than words — they're how we operate, grow, and lead. Our values should guide our decisions, shape how we work together, and keep us focused on what matters.

You'll see these non-negotiables and values embedded throughout our Code of Conduct. It's here to protect what makes Qnity truly different and strong: our people, our culture, and our future. Together, we're building a company with the courage to lead, the energy to grow, and the vision to shape what's next.

—Jon Kemp
CEO, Qnity

Our Code

At Qnity, we are committed to maintaining the highest standards of integrity, safety, professionalism, and respect in everything we do. This Code of Conduct (Code) serves as a guide for ethical decision-making and responsible behavior across all levels of our organization and applies to all employees, as well as businesses and subsidiaries where Qnity has a controlling interest. It outlines the principles that govern our interactions with colleagues, clients, business partners, and the broader community.

By adhering to this Code, we foster a culture of trust, accountability, and respect. Every employee, regardless of role or tenure, is expected to understand and uphold these standards. Together, we create an environment where ethical conduct is not just encouraged but expected.

While the Code reflects our current commitments, it may be refined over time to address new challenges, opportunities, and insights. If any part of this Code conflicts with a legal or regulatory requirement, such requirement will apply instead.

Waiver

In certain circumstances, it may be appropriate to waive a provision of this Code. All waivers must be reviewed and approved by the Qnity Board of Directors.

Our Responsibilities

We do business responsibly. This means we follow Qnity's Code of Conduct and commitments, comply with laws, regulations, and company policies, and act with integrity in all that we do. If any of these standards appear to conflict, consult a member of the Qnity Legal team for appropriate guidance.

To meet these responsibilities, we must:

- **Not ask or allow others**—such as suppliers, agents, or contractors—to do anything we should not do ourselves.
- **Speak up** if we have questions or concerns about the company's practices.

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- **Never hide** someone's failure to comply with a law, a regulation, or a company policy or procedure.
- **Report suspected violations** of the law, Code, or company policies.
- **Cooperate fully and honestly** in any investigation.

Responsibilities for managers

Managers serve not only as decision-makers but also as leaders whose actions shape the ethical climate of the workplace. Their behavior sets a powerful precedent, influencing how employees interpret and apply the company's values and standards. By consistently demonstrating integrity, fairness, respect, and accountability, managers reinforce a culture where ethical conduct is expected. This leadership by example is essential — not only for maintaining trust and compliance — but also for inspiring teams to uphold the highest standards in their own work.

Managers should:

- **Demonstrate integrity** in all decisions and actions.
- **Follow company policies** and the Code of Conduct consistently.
- **Encourage transparent communication** and provide clear, truthful information.
- **Treat others with respect** and foster an inclusive, professional environment.
- **Promote accountability** by holding themselves and their teams accountable for ethical conduct.
- **Be available to discuss ethical concerns** or dilemmas and offer support and resources for employees facing difficult decisions.
- **Avoid conflicts of interest** and disclose any potential conflicts while acting in the best interest of the organization.
- **Stay informed** of the latest ethical standards, laws, and industry regulations.
- **Complete ethics training timely** in accordance with Company policy and encourage team members to do the same.

Making Good Decisions

When faced with a challenging situation, ask yourself not just what is allowed – but what is right. Consider the following questions.

- **Is it legal** - Am I complying with all applicable laws, regulations, and company policies?
- **Is it aligned with our values** - Does this action reflect the values and principles outlined in our Code of Conduct?
- **Would I feel comfortable if this decision were made public** - How would I feel if this appeared in the news or was shared with my family or colleagues?
- **Am I being honest and transparent** - Have I communicated truthfully and openly with all relevant parties?
- **Could this decision harm others** - Does this action negatively impact coworkers, customers, or the company's reputation?
- **Am I dealing fairly** - Am I treating everyone involved, including internal and external stakeholders, with fairness, respect, and impartiality?
- **Would I make the same decision if I weren't personally affected** - Am I avoiding conflicts of interest and personal bias?
- **Have I sought advice when unsure** - Have I consulted with a manager, a member of the Qnity Legal team, or the Ethics team before proceeding?

What resources can help?

- Relevant laws and regulations (contact a member of the Qnity Legal team if needed)
- Qnity's Code of Conduct and policies
- Professional or industry standards
- [Resources](#) on our intranet

Raising Concerns and Non-Retaliation

We maintain an environment where everyone can speak up without fearing retaliation. Every Qnity employee has a responsibility to speak up when there are questions or concerns about ethics or compliance. Many resources are available to help you.

Your manager or supervisor is often the best resource because they know your role and responsibilities. If you're uncomfortable speaking with them or they're unavailable, you can also reach out to:

- Your business, function, or site leadership.
- Your Corporate Compliance Officer or Ethics Champion.
- A member of the Qnity Legal or Finance teams.
- A member of the Qnity Human Resources (especially for workplace issues like disrespectful behavior, discrimination, or harassment).
- The Qnity Ethics Hotline, which is a free, multilingual service for employees and non-employees to report concerns. Visit <https://qnity.ethicspoint.com/> for details.

We treat all reports confidentially and share information only with those who need to know to address the concern. You can choose to remain anonymous, and we will protect your identity in compliance with local laws and regulations.

What is misconduct?

Misconduct may include any violation of the law, this Code, or company policies. It may also include unethical conduct or the misuse of company resources, among other things that are harmful to others or Qnity. We take all reported matters seriously and will take appropriate action when violations are confirmed.

Non-retaliation

We are committed to creating an open environment where concerns can be raised. We do not allow anyone to restrict or discourage reporting of theft, fraud, waste, abuse, human rights concerns, or any other suspected misconduct. Retaliation is strictly forbidden. We investigate all cases of retaliation and hold violators accountable.

Our Ethics and Compliance Program

Ethical conduct and compliance are foundational to how we operate at Qnity. The Chief Ethics & Compliance Officer oversees Ethics and Compliance Central (E&C Central), a team that works with senior leaders to promote this mindset. Strong ethics and compliance creates a competitive edge and supports sustainable operations.

Global compliance officers focus on key risk areas and oversee the vision, policies, and performance of the program. They ensure that each business and function maintain effective compliance practices.

The E&C Central team also works with line managers to promote Qnity's values and build a culture of integrity. We achieve this by:

- Coordinating communications and trainings.
- Conducting internal investigations and risk assessments.
- Managing ethics and compliance programs.
- Ensuring accountability through oversight.

Training on the Code

As Qnity team members, we are all trained on this Code during onboarding. We routinely complete refresher training and submit a Business Ethics Certification. This certification confirms our review and understanding of the Code and our agreement to follow it.

Learn more: [Ethics & Compliance Central](#) on the Qnity intranet

Investigations and Consequences

We investigate all reports of misconduct, including violations of the law, regulations, or company policies. Those responsible for misconduct will face disciplinary action. This may include termination, legal action, or both, where appropriate.

Our People

Our respectful workplace culture is paramount to Qnity's success. We are committed to behavior that values each person's ideas and contributions.

We are committed to respecting privacy and maintaining a safe environment where all injuries and incidents are preventable. This includes protecting the personal information of current and former team members and complying with applicable safety and data protection laws.

We foster a culture of respect for employees, customers, and communities. This empowers our workforce, strengthens our reputation, and drives innovation.

We treat everyone — employees and business partners alike — with professionalism, dignity, and respect. This allows us all to contribute, innovate, and excel.

Workplace Culture

At Qnity, we are dedicated to fostering a workplace where everyone is treated with dignity and respect, which includes ensuring equal opportunities, prohibiting harassment, and maintaining a workplace free from violence or threats.

Equal opportunity

We ensure fair treatment in hiring, promotions, pay, and training. We do not discriminate based on personal characteristics such as age, race, religion, color, gender, disability, national or ethnic origin, ancestry, marital status, family status, sexual orientation, gender identity or expression, or veteran status. Qnity complies with all laws that protect individuals from discrimination.

Harassment-free workplace

Harassment of any kind is unacceptable. Examples include hate-based comments, unwelcome physical contact, requests for sexual favors, and misuse of company systems. Report harassment to a member of Human Resources or the Ethics Hotline.

Workplace violence

We are committed to a workplace free of violence, including threats, intimidation, or physical harm. We expect those involved in conflicts or disagreements to settle them respectfully. Anyone who experiences or observes violent behavior should report it to local authorities, site security, the Ethics hotline, their supervisor or manager, and/or a member of Human Resources. Violators will face consequences.

Privacy and Personal Information

Qnity informs employees and others about the personal information it collects and how it is used. Employees must follow company policies and applicable privacy laws to protect this information, as outlined in our [Global Information Privacy Policy](#). Local managers ensure that business procedures align with the policy and local laws.

Learn more: [Privacy Central](#) on the Qnity intranet

Personal use of company assets

Company facilities, equipment, and services, like offices, telephones, and computing systems, are primarily for business use. No one should expect privacy when using these resources.

Qnity reserves the right to access, monitor, and search company property and communications. Any information we access may also be shared with third parties and legal authorities when required (subject to applicable laws).

Safe and Responsible Work Practices

We believe all injuries and safety incidents are preventable. We also encourage off-the-job safety to protect our employees beyond the workplace.

Compliance with safety law and our commitment to our employees' health and well-being is everyone's responsibility. Management provides education and training to ensure everyone understands and complies with these standards.

Substance abuse policy

We expect everyone to:

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- Never report to work under the influence of illegal drugs, alcohol, or controlled substances.
- Understand that the use or possession of illegal drugs at work is not allowed.
- Follow all substance-related policies to maintain a safe workplace.

Substance abuse creates safety risks and affects performance. Violations of this policy are taken seriously.

Our Company

At Qnity, we are committed to conducting business safely with integrity, transparency, and accountability. We manage our responsibilities as stewards of the company's reputation and resources.

We do this by:

- Avoiding conflicts of interest
- Preventing insider trading
- Engaging in fair dealings with all internal and external stakeholders
- Participating responsibly in political activities
- Safeguarding company assets and confidential information
- Protecting intellectual property
- Maintaining accurate records

Ensuring appropriate external communications, including full, fair, accurate, timely, and understandable disclosures in our external reporting disclosures.

By adhering to these principles, we reinforce a culture of trust and ensure that our actions reflect the values that define our company.

Conflicts of Interest

At Qnity, we must ensure that our personal interests and activities do not interfere with our responsibilities to the company. This includes avoiding even the appearance of a conflict of interest. If a potential conflict arises, it is our responsibility to promptly disclose it so management can review and address the situation.

Recognizing conflicts

Conflicts of interest may include:

- Outside work or activities that interfere with company duties.

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- Use of insider information for personal gain.
- Financial interests in companies that do business with or compete against Qnity.
- Family or personal relationships that could affect decisions.

Family members and relationships

Managers must not oversee family members or have romantic relationships with persons they supervise. Report such situations immediately so management or HR can address them.

Family members include close relatives like parents, children, siblings, in-laws, and others living in the same household. Other relationships may also create conflicts. Managers should assess these situations on a case-by-case basis.

External employment, work, or activities

To avoid actual or apparent conflicts with outside activities, you must not:

- Take roles such as director, officer, partner, consultant, or other key positions with organizations that do business with or compete against Qnity.
- Act as an intermediary in transactions involving Qnity.
- Take outside jobs or start businesses that interfere with Qnity responsibilities.
- Provide information to a third-party research organization in exchange for compensation.
- Serve in government roles that conflict with company duties.
- Use Qnity property, information, or time for personal gain.
- Use your Qnity title or position in ways that imply company support for outside activities.
- Use Qnity supplies or facilities for outside activities without manager approval.

Before engaging in activities such as publishing, speaking, or consulting, check with your manager to ensure they don't conflict with your role at Qnity.

Examples of corporate opportunities

Using a Discovery for Personal Gain

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An employee working in product development discovers a new way to improve the durability of a specialty coating used in semiconductor manufacturing. Instead of sharing the idea with the company, they use it to start a side business or sell the concept to a competitor.

Taking a Real Estate Opportunity

You learn that Qnity may want to purchase local property, so you buy it first to sell back at a profit.

Taking personal advantage of these opportunities violates our policies.

Disclosing and Addressing Conflicts

Disclose any potential conflicts promptly to your manager, a Corporate Compliance Officer, or a member of the Qnity Legal team. These disclosures should also be included in the annual Business Ethics Certification. Management will review and resolve conflicts confidentially, consulting Ethics & Compliance Central as needed.

Learn more: [Resources](#) on the Qnity intranet

Insider Trading

At Qnity, we must not use material non-public information, also known as "inside information," to trade securities or help others trade. Inside information includes any confidential details that could affect a company's stock price if disclosed.

What you need to know

Inside information may include:

- Expected earnings or financial results.
- Mergers, acquisitions, or major investments.
- Product launches, intellectual property developments, or significant legal updates.

Using inside information to trade securities is illegal in many countries, including the United States. Penalties are severe and apply to trading Qnity stock or the stock of other public companies about which you may have inside information.

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As a general rule, wait one business day after inside information is made public before trading. When in doubt, do not trade. Contact the Corporate Secretary for guidance.

Examples of inside information

- Learning about a major research discovery that will transform the market
- Knowing Qnity plans to invest in a publicly traded company
- Hearing that Qnity is about to award a significant contract to another company
- Knowing about a pending merger or acquisition that has not been announced publicly

Guidelines for trading

While possessing inside information, you must not:

- Buy or sell Qnity stock.
- Trade the stock of other companies related to the inside information.
- Change your investment elections in a company savings plan involving Qnity stock.
- Pass this information on to others who could use it to trade securities.

If you are an executive officer, you must follow special pre-clearance procedures and pre-clear with the Corporate Secretary before making any trades.

Learn more: [Resources](#) on the Qnity intranet

Political Activities

Qnity respects the political rights of individuals while ensuring strict compliance with laws governing political contributions and activities. These laws vary by country, and violations can result in serious penalties.

Guidelines for political contributions

- Company resources, funds, and locations must not be used for political contributions or activities without approval from a member of the Qnity Government Affairs team and a member of the Qnity Legal team.

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- United States law may prohibit Qnity from making political contributions in, or participating in, other political activities in certain countries. Always check with a member of the Qnity Legal team before engaging in political activities on behalf of Qnity.
- Employees may make personal contributions to political parties, committees, or candidates, provided no company resources are involved.

No one at Qnity should pressure others to contribute money or effort to support any political party or candidate.

Communicating with government officials

When interacting with government officials on matters of policy:

- Consult a member of the Qnity Government Affairs or the Qnity Legal team beforehand to determine if you must register as a political advocate or “lobbyist.”
- Be aware that “political advocacy” may include almost any business-related communication with government officials.
- Report interactions with government officials as required by law.

Use of company locations for political speeches or events must also be approved by Government Affairs and a member of the Qnity Legal team, as such use may be considered a political contribution.

Company Resources

Qnity provides valuable physical resources like specialized equipment, tools, and facilities to support our work. We all must use these responsibly and protect them from damage, theft, or misuse.

Company resources are primarily for business use. Limited personal use may be allowed if the use is minimal, follows site policies, and is approved by management.

Protecting physical assets

- **Buying assets:** Obtain property legally and ensure fair value when buying supplies or materials.

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- **Using assets:** Handle equipment carefully to avoid damage or loss.
- **Securing assets:** Keep property safe from theft or unauthorized use by storing it in secure locations.
- **Sharing assets:** Share resources with outside parties only if authorized and only within company policies.
- **Disposing of assets:** Dispose of property only with approval and follow company rules.

Computers and communication systems

Qnity's resources include computers, phones, networks, and other devices. These tools must be protected and used properly. To safeguard them:

- Follow policies for encrypting sensitive data and securing devices.
- Protect equipment from theft or loss.
- Follow Information Security guidelines when using all company systems and devices.

No one should expect privacy when using company equipment, since Qnity reserves the right to access, monitor, and search company property and communications.

Confidential Information and Intellectual Property

We protect the intellectual property (IP) and confidential information of Qnity and our business partners to maintain our competitive edge and ensure compliance with the law. This includes proprietary formulations, process technologies, and material innovations that differentiate Qnity in the electronics industry.

Intellectual property

Qnity's IP includes inventions, patents, trademarks, trade secrets, and copyrights. Some IP is publicly available, such as logos, graphics, and published written work. Other types, like trade secrets, are confidential and must be safeguarded to protect their value.

Types of intellectual property

- **Patents:** Protect inventions by consulting Legal about filing patents when appropriate.
- **Trademarks and Copyrights:** Use trademarks, logos, and brand materials properly, and follow brand guidelines. Report any misuse or suspected counterfeiting to management, the Qnity Legal Trademark & Copyright Group, or the Brand Protection Team.
- **Trade Secrets:** These are confidential innovations or information that give Qnity a competitive edge, such as formulas, processes, designs, and supplier details.

Inventions

An invention is any new and useful product, method, or process. Protecting inventions may involve filing patents, keeping them as trade secrets, or publishing them to prevent others from patenting the idea. Consult a member of the Qnity Legal Team to determine the best course of action.

Confidential information

Confidential information includes sensitive business, technical, or personal data that must be protected. Examples are:

- Financial data, customer details, and business strategies.
- Research findings, product designs, and supplier information.
- Future plans like acquisitions, divestitures, or new product launches.
- Pricing strategies and detailed pricing models.
- Manufacturing processes and proprietary formulas.
- Sales forecasts and market analysis reports.

Qnity's information classification

Qnity classifies information into four levels:

- **Special Control:** Highly sensitive, such as research or business strategies

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- **Confidential:** For need-to-know use only, including proprietary financial and technical information
- **Official Use Only:** Internal non-public information, like general business communications
- **Public:** External materials, such as press releases and annual reports

Protecting confidential information and IP

- Share only when you are authorized to do so and a confidentiality agreement is in place.
- Mark all shared information as “Confidential.”
- Limit disclosures to what is necessary for business purposes.
- Report trademark or brand abuse or counterfeit products to your manager, the Corporate Brand Protection Center, or the Legal Trademark and Copyright Group (Qtrademarks.legal@dupont.com).

Departing the company

When leaving Qnity, employees must:

- Return all company property, including devices and documents.
- Not take or share copies of confidential information (including trade secrets) or anything marked “Official Use Only”, “Confidential”, or “Special Control.”

Prior to an employee’s departure, their line manager should oversee the process and assure all Qnity-issued assets, devices, and documents are retrieved.

Recordkeeping and Reports

All information that we produce is considered a record, including business and technical reports, personnel files, contracts, or anything else concerning Qnity. Everyone at Qnity must maintain honesty and transparency in our documentation and data. Falsifying, altering, or omitting information is strictly prohibited.

Our records

When creating, maintaining, or disposing of our records, we must ensure that they are:

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- Accurate, clear, and complete.
- Transparent, identifying the true nature of the transaction, asset, liability, or equity.
- Documented in a proper and timely fashion.
- In compliance with generally accepted accounting principles and standards.
- In compliance with our policies, including our Corporate Records Information Management Policy, unless the policy conflicts with the law or contract (in these cases consult with a member of the Qnity Legal team and the Finance team).

Improper recordkeeping

Intentionally making misleading, misdirected, distorted, or deliberately incomplete records is strictly prohibited and could lead to civil and criminal penalties. Such deceitful practices include:

- **Misclassifying** inventory or amounts between cost or capital.
- **Recording** costs or revenue that do not meet generally accepted accounting principles.
- **Falsifying** company documents.

Expense reporting

Anyone submitting or approving expense reports must ensure that:

- The expenses comply with Qnity's Global Travel and Expense Reporting Policy
- The expenses are proper and reasonable.
- The report is submitted promptly.
- Receipts and explanations support the expenses.

Learn more: [Resources](#) on the Qnity intranet

External Communications

Our external communications must be accurate, complete, and professional. Only authorized individuals may speak on Qnity's behalf.

Responding to outside parties

From time to time, journalists, analysts, government officials, or others may ask us to speak about Qnity. Refer these inquiries to the correct department:

- **Government or regulatory officials:** A member of the Qnity Legal team or Government Affairs
- **Media or journalists:** Corporate Communications
- **Financial analysts:** Investor Relations
- **Law enforcement or outside attorneys:** A member of the Qnity Legal team

Never share trade secrets, confidential information, or information labeled “Internal Use Only” or “Special Control” unless there is an approved business need. See [Competition Practices](#) for guidance on contacts with competitors. When speaking solely for yourself and not speaking on Qnity’s behalf, you need no approval to engage with outside parties, so long as you do not give the impression that you represent Qnity.

Responsible social media use

Follow Rules

Always follow the Code of Conduct and Qnity’s Social Media Policy and Guidelines when posting company-related topics on internal or external platforms.

Be Responsible

Know how the platform works, including relevant privacy and copyright laws. Be careful about what you post. Once posted, you may not be able to erase it.

Act Professionally

Do not post anything illegal, harassing, threatening, or discriminatory. Do not share confidential information or private company photos or videos.

Personal social media use

When using social media personally, keep in mind that what you post could affect Qnity. When posting about the company:

- Never share confidential information.

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- Use a disclaimer like “All views expressed are mine” to show you are not speaking for Qnity.
- Do not use “Qnity” or brand names like “Kalrez®” in your username.

Qnity may monitor social media activity on company devices or networks to ensure compliance with policies.

Our Business Partners

We meet marketplace expectations for ethical conduct. Our success depends on how well we serve and interact with our business partners, including our customers and consumers.

We focus on building trust through sound business practices. By treating others with respect and acting with integrity, we strengthen relationships and ensure long-term success.

We act responsibly in all interactions, including exchanging gifts, participating in business entertainment, handling payments, working with government officials, using competitive information, conducting business across borders, and protecting third-party privacy.

Gifts and Entertainment

At Qnity, we build strong relationships with customers, suppliers, and business associates. We do not give or accept gifts or entertainment to influence business decisions. Our actions must reflect good judgment and integrity.

Guidelines for gifts and entertainment

Gifts or business entertainment must:

- Have a clear business purpose.
- Never look like a bribe or improper payment.
- Not aim to unfairly or improperly influence decisions.
- Follow laws and ethical standards.
- Avoid embarrassing Qnity if made public.
- Be approved by a vice president or corporate officer if they exceed Qnity's "High Value Amount."

More rules may apply in certain regions, roles, or when working with government officials. Check with your manager for details.

Setting expectations

To avoid issues, discuss gift and entertainment rules early in a business relationship.

Learn more: [Resources](#) on the Qnity intranet

Bribes and Kickbacks

Bribes and kickbacks are illegal in nearly every country and not in line with our expectations for ethical behavior at Qnity. Offering, accepting, or requesting anything of value to influence a business decision or government action is strictly prohibited.

Key points

Employees must never:

- Offer, request, or accept bribes or kickbacks directly or through a third party.
- Make “facilitating” payments, including tips, to government officials to expedite routine actions, such as issuing permits or completing paperwork.

Even non-cash gifts may be seen as bribes, so always exercise caution.

Payments for Products and Services

We must ensure all payments for products and services are legal, ethical, and transparent. This means complying with accounting, tax, currency exchange, and anti-bribery regulations. Illegal or unethical payments are strictly prohibited.

Guidelines for payments

Payments must be:

- **Reasonable** in value and aligned with industry norms.
- **Competitively justified** and properly documented.
- **Made to the correct business entity** listed on the agreement or invoice.
- **Paid by check, bank transfer, or credit note** — *never in cash* — to the appropriate location or account.

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- **Free from falsification or misrepresentation** in documents such as invoices or letters of credit.
- **Charged to the correct entity or account**, providing full transparency.
- **Aligned with written trade terms**, such as commissions, rebates, or discounts.

Exceptions should be rare. If you are unsure about a payment's legality, or you need to request an exception, seek guidance from a member of the Qnity Legal team and Controllershship.

Accountability

Everyone approving payments for Qnity is responsible for understanding the full transaction to ensure it complies with company policies.

Never make or receive payments that could appear to violate laws or regulations.

International Trade Controls

We follow all laws and regulations governing global trade. Every country where we operate may have unique rules, but everyone must act responsibly and ethically in all transactions. Everyone at Qnity must understand and comply with trade laws to protect Qnity's reputation as a responsible global company.

Key areas of compliance

- **Export Controls:** Follow rules for transferring products, services, and technology between countries. This includes sharing technical data online, through conversations, or across databases. Consult a member of the Qnity Legal team early if you have questions or concerns that a government export license may be required.
- **Re-exporting:** Be aware that U.S. export laws also apply to re-exporting products or technology to a third country.
- **Customs and Imports:** Accurately classify and report the value, origin, and details of all imported products. Ensure proper documentation to comply with local laws.
- **Antiboycott:** Avoid participating in unsanctioned boycotts, including the Arab League boycott of Israel. Immediately report any requests related to boycotts to a member of the Qnity Legal team.

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- **Trade with Sensitive Destinations:** Be familiar with Qnity's Trade Compliance Summary which applies to all Qnity businesses, including controlled subsidiaries, joint ventures, and affiliates worldwide and governs all proposed import and export transactions.

Our policies and guidelines

Qnity enforces policies and guidelines that ensure compliance with trade laws:

- **Policy on Trade with Sensitive Destinations:** This policy ensures compliance with trade laws and foreign policy considerations.
- **Export Controls and Antiboycott Compliance:** This guideline outlines our responsibility to follow relevant trade controls as well as report any information requests that may involve a boycott.

Always consult a member of the Qnity Legal team when dealing with trade, export, or boycott-related issues.

Learn more: [Resources](#) on the Qnity intranet

Anti-Money Laundering

Qnity does not associate with anyone involved in criminal activity, including money laundering. Money laundering occurs when individuals or groups hide the origins of illegal funds or make them appear legitimate.

How we prevent money laundering

Everyone at Qnity must:

- **Follow the law:** Know and comply with all anti-money laundering laws and regulations.
- **Use approved payment practices:** Make and receive payments only through documented and approved processes.
- **Watch for red flags:** Stay alert for unusual requests, such as cash payments or unexpected terms.

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- **Speak up:** Report any suspicious transactions or activities that may involve money laundering to a member of the Qnity Legal or Ethics & Compliance teams, your manager, or to the Ethics hotline.

Our commitment

Qnity complies with all laws that prevent money laundering and the financing of illegal activities. We ensure that our business is conducted with reputable customers, for legitimate purposes, and with legitimate funds.

Data Privacy

At Qnity, we are committed to protecting personal information collected about employees, customers, consumers, suppliers, and other third parties. Personal information includes details that can identify an individual, such as names, contact information, account credentials, or biometric data.

Your responsibilities

Employees handling personal information must:

- **Know and follow privacy laws:** Understand and comply with applicable laws for collecting, transferring, and using personal data.
- **Ensure security:** Protect personal information with appropriate physical and electronic controls.
- **Follow cross-border requirements:** Use approved agreements when transferring data internationally.

Our commitment

As a global company, Qnity seeks to comply with all applicable privacy laws and follows our Global Information Privacy Policy (<https://www.qnityelectronics.com/gipp.html>). This policy outlines our privacy practices and commitments to safeguard data.

Learn more: [Privacy Central](#) on the Qnity intranet

Competition Practices

At Qnity, we compete every day to meet customer needs and enhance shareholder value. However, we always follow competition laws, which apply in most countries where we do business. These laws prohibit actions that restrain trade or reduce competition. Violating these laws can result in severe penalties for Qnity and anyone involved.

What to avoid

Be familiar with Qnity's Policy on Trade with Sensitive Destinations, which applies to all Qnity businesses, including controlled subsidiaries, joint ventures, and affiliates worldwide and governs all proposed import and export transactions.

Price-Fixing and Boycotts

We must never agree with competitors to fix prices, terms, or conditions of sale, or to boycott specific suppliers or customers.

Dividing Markets or Limiting Products

We must never divide customers, products, or markets with competitors or limit the production or sale of products in coordination with others.

Misrepresentation or Theft

We must never misrepresent ourselves to gather competitive information or steal information from competitors.

Competitors, Suppliers, and Trade Associations

If your work requires interaction with Qnity's competitors, suppliers, or industry trade associations, you are expected to review policy and obtain approval before you:

- Develop price communications.
- Attend trade association meetings or events involving competitors.
- Engage directly with competitors.

To avoid violating antitrust laws, you must:

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- Never engage in practices that restrict free trade or competition including discussing sales strategies or pricing with third parties.
- Avoid any discussion of proprietary or confidential data with competitors.
- Not solicit or share competitive information through third parties.
- Immediately stop discussions if sensitive topics arise and report the incident.
- Contact a member of the Qnity Legal team if you have additional questions.

Competitive information

We value competitive information, but only when it's collected legally and ethically. Everyone at Qnity must follow these rules:

- Never steal or misrepresent yourself to gather data.
- Avoid using agents or third parties to obtain information inappropriately.
- Consult a member of the Qnity Legal team if you're unsure about gathering competitive information responsibly.

By following these guidelines, we protect Qnity's reputation and comply with competition laws worldwide.

Government Relations

At Qnity, working with government organizations, officials, and state-owned enterprises requires special care. Every government has its own rules for business. We must always act ethically and follow these rules. Whether we work with government officials in their capacity as customers or regulators, our actions must show Qnity's commitment to integrity.

Key areas of focus

Interacting with Government Officials

Follow all laws when working with government officials. Even small gifts or meals can be seen as bribes or kickbacks, no matter what the intent. Always check with a member of the Qnity Legal team before giving anything of value to government officials.

Government Contracts

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Government contracts often have strict rules. These include keeping records of costs, protecting company information, and following rules about gifts and entertainment. Breaking these rules can lead to serious penalties. If you are unsure, ask a member of the Qnity Legal team for help.

Travel for Non-U.S. Government Officials

Qnity may pay for reasonable travel costs for non-U.S. government officials visiting our facilities, but only under certain conditions. These costs must:

- Be compliant with local laws.
- Be paid directly to the provider, such as a hotel or restaurant.
- Relate directly to the visit.
- Fall within the guidelines of our Gift & Entertainment Policy.

Paying for unrelated travel costs is not allowed.

Our commitment

When working with governments, we must act responsibly and follow all rules and laws. Breaking these rules can lead to serious consequences for Qnity and the individuals involved. Always ask a member of the Qnity Legal team if you are unsure about the rules for working with government officials.

Learn more: [Resources](#) on the Qnity intranet

Third-Party Risk Management

The third parties we work with are vital to delivering quality results for our customers. We hold them to the same high standards of behavior that we expect from everyone at Qnity.

Our expectations

Our [Supplier Code of Conduct](#) outlines expectations for ethical conduct, compliance, and responsible business practices across our supply chain. We expect our suppliers to review and uphold these standards as part of their engagement with Qnity. We appreciate the role our third parties play in upholding these standards and advancing our shared goals.

Supplier selection and engagement

We select suppliers using a strategic sourcing process that includes:

- Carefully evaluating their capabilities and alignment with our standards.
- Completing a thorough due diligence process.
- Securing stakeholder approval to ensure we work with the right partners.

Our Communities

At Qnity, we are committed to creating a better world for people everywhere. We focus on protecting the environment, ensuring product safety and quality, and respecting human rights throughout our supply chain. Guided by principles such as integrity, safety, and accountability, we aim to make a positive impact on lives and communities worldwide while clearly focusing on innovating with integrity to create value.

Environmental Protection

Every one of us has a role to play in protecting the environment. Management provides training and resources to help employees understand and comply with environmental laws. We must all:

- Follow environmental policies, standards, and procedures.
- Conduct business with care and respect for the environment.
- Comply with applicable environmental laws and regulations.

Learn more: [Resources](#) on the Qnity intranet

Product Safety and Quality

We are committed to delivering high-performance materials and technologies that meet rigorous safety, reliability, and quality standards. Our responsibility includes managing risks across the product lifecycle and ensuring compliance with global regulations across our entire supply chain.

Our key commitments include:

- **Reliability:** Our materials and technologies perform as expected.
- **Compliance:** We meet all safety, quality, and regulatory standards.
- **Precision:** We build to exact specifications.
- **Risk Management:** We identify and reduce safety and quality risks.

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- **Collaboration:** We work closely with customers and suppliers.

Learn more: [Resources](#) on the Qnity intranet

Human Rights

Qnity is committed to protecting and advancing human rights wherever we operate. We work with partners who share our principles and uphold a similar ethics-focused mindset.

Our standards

- Our Human Rights Policy is guided by principles of safety, sustainability, and respect for human dignity.
- Our Code of Conduct is supported by our product stewardship programs, regulatory compliance program, and endorsement of the ten guiding principles of the U.N. Global Compact.
- We promote training to ensure compliance with laws and policies.

Your responsibility

- Conduct business ethically and responsibly.
- Identify and work with suppliers who align with our values.
- Report any human rights concerns promptly.

Learn more: [Resources](#) on the Qnity intranet



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