



## *CODE OF CONDUCT*

### **1. INTRODUCTION:**

Chase has adopted this Code of Conduct to ensure its directors, officers, employees, representatives, agents (herein "Stakeholders"), customers, suppliers, and vendors (hereinafter "Trusted Partners") understand our core values and expectations that we will conduct ourselves in accordance with the highest ethical standards.

At Chase Corporation, we are committed to the highest standards of professional behavior and ethics in all its interactions with its Stakeholders and Trusted Partners. All Stakeholders must treat our Trusted Partners with dignity and respect and comply with applicable laws and regulations. Chase and its stakeholders must also follow this Code when interacting with neighborhood and local communities.

Amongst Chase Stakeholders, this Code serves as a shared commitment to our core values and ethical standards. Chase promotes a workplace that is respectful, fair, and free from discrimination. Chase is an equal opportunity employer and welcomes people from all backgrounds.

### **2. SCOPE:**

This Code of Conduct applies to all community and public spaces where a Stakeholder officially represents the Company. Official representation exists when a Stakeholder represents the Company in both physical and virtual spaces.

A Stakeholder who violates this Code of Conduct is subject to disciplinary action, up to and including termination of employment. A Stakeholder in violation may also be subject to civil or criminal liability.

### **3. YOUR ROLE**

All Stakeholders must put compliance and ethics first. All Stakeholders must Act ethically and with integrity in all business dealings, know and follow the Code and Chase policies, comply with the law, and report all alleged, potential, or actual violations of Chase's Code, policies or the law using the available reporting channels.

Fully cooperate with compliance investigations, e.g., making your devices available for inspection (when legally permissible) and answering questions truthfully during an investigation; complete all mandatory compliance education courses and other Chase Compliance and Ethics Program requirements in a timely manner.

ANY FAILURE TO COMPLY WITH THIS CODE OR ITS SUPPORTING POLICIES WILL BE FULLY INVESTIGATED AND APPROPRIATE ACTION WILL BE TAKEN SUCH AS RETRAINING, DISCIPLINE, OR OTHER CORRECTIVE ACTION, INCLUDING TERMINATION OF EMPLOYMENT, DEPENDING ON THE CIRCUMSTANCES.



ANYONE WHO RAISES A CONCERN IN GOOD FAITH ABOUT A POSSIBLE BREACH OF THIS CODE, VIOLATION OF POLICY OR ANY OTHER COMPLIANCE CONCERN WILL NOT BE SUBJECT TO RETALIATION. ANY ACT OR THREAT OF RETALIATION IS CONSIDERED A SERIOUS VIOLATION OF THIS CODE.

#### **4. MISSION STATEMENT:**

Chase Corporation's vision is to be recognized as a leading manufacturer of protective materials for high-reliability applications throughout the world.

We will achieve our vision by securing our place as a trusted partner of our customers. We will provide effective and reliable product solutions that enhance our customers' performance and competitive position.

We will grow our business responsibly by balancing short and long-term objectives, effectively managing risk, implementing sustainable business practices, and continuously improving our operating performance.

We will conduct business ethically, contribute to the communities in which we operate, show respect for the environment, and treat our Stakeholders fairly.

Fulfilling our mission will create long-term value for our shareholders.

#### **5. CORE VALUES:**

##### ETHICS

We own our behavior, keep our promises, value honesty, honor the community/environment, and embrace diversity.

##### TEAM AND DEDICATION

Dedication to the team achieves best-in-class solutions for products, processes, and people.

##### CUSTOMER FOCUS

Customer satisfaction is at the center of what we do. We are the trusted partner of customers worldwide.

##### SAFETY, QUALITY & WELL-BEING

Exceed industry standards for safety and performance by leveraging core values.

##### EMPOWERED & DELIBERATE

Stakeholders are encouraged to take action and ensure timely delivery of expectations.

#### **6. STANDARDS:**

##### ETHICAL DECISION-MAKING

At Chase Corporation, we commit to ethical decision-making centered around our core values. Honesty, respect, fairness, and community are at the forefront of our decisions.

##### COMPLIANCE WITH THE LAW AND REGULATIONS

Chase commits to both understanding and adhering to all rules, policies, procedures, regulations, and laws of all state, federal, or local government authorities in the communities in which we are



present. Chase and its stakeholders must act with integrity and in compliance with legal requirements and commercial practices of lawful business. We take seriously and are committed to every legal, binding contractual agreement we enter.

#### SUSTAINABILITY: HEALTH, SAFETY & THE ENVIRONMENT

At Chase Corporation, we commit ourselves to operating our business without compromising the needs of future generations. Thus, all our business decisions involve economic, environmental and social considerations. Chase understands the importance of waste management and its effect on the environment. We are committed to minimizing waste production by employing reduction, reuse, and recycling techniques at every stage of our process and operations. We ensure that all operations and activities are fully compliant with all current waste management legislation to minimize waste production throughout the Company and to operate within full compliance with environmental law.

Chase Corporation is committed to creating safe working conditions for our Stakeholders and to mitigating potential risks. This includes compliance with all applicable health and safety regulations.

All our Stakeholders commit themselves to protecting the health and safety of the communities in which we operate. Chase Corporation continually takes steps to preserve the environment through clean and conservative measures. Our Stakeholders are committed to mitigating our environmental impact by minimizing the use of finite resources and harmful emissions. Our Stakeholders are committed to reporting any concerns.

#### HUMAN RIGHTS

All Chase Corporation Stakeholders agree to treat all humans with the dignity and respect they deserve, without discrimination. This commitment is to both individuals and communities with which we work. Chase upholds individual human rights, including freedom from forced or compulsory labor and stands firmly against human trafficking. Chase seeks to provide a safe, healthy, and desirable workplace with working conditions, wages, and benefits that meet or exceed applicable laws and reward performance. Chase complies with all child labor laws and supports the elimination of unlawful child labor and exploitation. Chase expects the same ethical conduct from our business partners.

Chase is committed to equity in our employment practices and compliance with all applicable laws. We firmly condemn child or slave labor of any kind and any form of compulsory or bonded labor. Further, we oppose all unethical labor practices that exploit the workforce, destroy social security or serve to evade taxes.

Chase will undertake efforts to identify and prevent human rights risks to people in our business and supply chain. Where Chase has identified human rights violations resulting from or caused by our business activities, we are committed to providing for or cooperating in their fair and equitable remediation. Chase seeks to promote remediation where we are linked to, or involved in, adverse human rights impact through our relationships with third parties.



Chase has a zero-tolerance policy for harassment, discrimination, bullying or victimization of any kind. Any form of discrimination based on non-relevant traits is strictly prohibited. Chase has a strong and continuing commitment to meet or exceed the needs of its Stakeholders and Trusted Partners. Chase policies and practices are designed to support an empowered and highly motivated workforce in an environment marked by open, honest communications and respect for every Stakeholder and Trusted Partner. Chase will uphold the freedom of association and recognize the right to collective bargaining, which is consistent with local laws and will honor all of its legally mandated obligations.

Chase meets its obligations to us by providing proper working hours and wages, including overtime pay, which is consistent with local law. This includes equal compensation for work of equal value, without distinction based on gender.

## **7. ETHICAL BUSINESS PRACTICES:**

Chase is committed to a free and fair-trade market and to compliance with all applicable competition and antitrust laws. Chase has an Antitrust Compliance training program in place in which all relevant stakeholders are required to participate.

### **FAIR DEALINGS**

All Stakeholders must adhere to the highest moral and ethical standards in any and all dealings in which they represent Chase. Chase follows our core values to establish relationships that are both lasting and built on trust with our customers, investors, partners, governments, and each other.

We strive for superior performance through ethical and legal business practices. Chase Stakeholders will never take advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional, unfair practice or inappropriate action.

### **COMPETITION**

Chase is committed to a free and fair-trade market. We do not participate in illegal business, including but not limited to side agreements on pricing, sales, boycotts, or anything that prohibits fair trade. We are tactful in our contact with competitors, and any concerns are brought to the Legal Department.

Chase Stakeholders must not exchange information or enter into agreements or understandings with competitors, customers, suppliers or other third parties that improperly influence free competition, research and development activity, or manufacturing, marketing, sales or distribution practices. Nor should Chase Stakeholders engage in business dialogue with our competitors unless there is a legitimate business reason to do so.

### **CONFLICTS OF INTEREST**

Chase Stakeholders must perform their job responsibilities loyally and objectively, without allowing personal, family or their own financial interests to influence their judgment. Employees must avoid not only actual conflicts of interest but also the appearance of a conflict of interest.



While Chase recognizes that its Stakeholders are free to make personal financial investments and to maintain social and business relationships, these relationships must not create any interests that conflict with those of the Company. Stakeholders are prohibited from (a) taking advantage of opportunities using Chase's property, information, or position, (b) using Chase's property, information, or position for personal gain, and (c) competing with Chase for business opportunities.

A conflict of interest arises when a Stakeholder's personal interest conflicts with the interests of the Company. Conflicts of interest inhibit the ability to perform duties in an objective, effective, and fair manner. Stakeholders at Chase agree to refrain from decisions that are relational, financial, competitive, and confidential conflicts of interest.

Stakeholders also agree to refrain from acts of self-dealing and unfair business practices. This includes taking advantage of company property, information, or position, using company property for personal gain, and competing with Chase for a business opportunity.

#### INSIDER TRADING

Insider trading is based on material non-public or insider information that a reasonable investor would find beneficial and important in a decision to buy or sell stock. It is a breach of fiduciary duty, relationship of trust and confidence. It is both unfair and illegal. Under no circumstance will Chase or its Stakeholders participate in insider trading.

Chase Corporation ensure that the tenants and intent of this this policy and the associated obligations extend to its Trusted Partners where there is an exchange of privileged, confidential, information.

Generally, information is considered public 48 hours after it is published in a newspaper or other media outlet, has been the subject of a press release, or was associated with a public filing with the SEC. Any questions should be brought to the Legal Department.

#### ANTITRUST LAW

Chase has an Antitrust Compliance training program in which all relevant Stakeholders are required to participate. This training ensures stakeholders are knowledgeable about federal and international antitrust, competition, and infringement laws. For any questions regarding antitrust issues, please contact Chase Corporation's Legal Counsel.

#### ANTI-MONEY LAUNDERING

Chase is committed to complying with anti-money laundering regulations. Our stakeholders commit to due diligence in their legal financial practices. Falsifying sources of funds, misrepresentation of ownership or control of assets, and any other concealing of financial information is strictly prohibited. Stakeholders in violation of this are subject to criminal liability.



#### ANTI-CORRUPTION, POLITICAL INVOLVEMENT

Chase has a zero-tolerance policy for corruption or bribery. Stakeholders agree to refrain from any behavior that could constitute bribery. Corruption, in order to obtain or retain business or an advantage, constitutes gross misconduct.

Chase Corporation complies with all applicable and relevant anti-corruption laws and regulations.

#### POLITICS

While Chase embraces our Stakeholders' rights to be politically active, we refrain from any political stance, donations, or contributions as a company. Chase encourages its Stakeholders to participate personally in civic affairs and the political process. To do so, you must make all personal political contributions with your own money. Conduct any personal political activities in accordance with applicable laws. Comply with Chase policies.

#### COMMUNICATION

Chase is committed to communicating with one voice. Whether it be to our customers, partners, stakeholders, or the media, we communicate wholly and accurately. Authorized personnel should be the only people to speak on behalf of Chase Corporation. Any inquiries to non-authorized personnel should be directed to the Legal Department.

When posting publicly on social media platforms, Chase Stakeholders do so responsibly and in the best interest of the Company. Such posts and statements, even on a private page, can be shared and may be archived forever. When having an online presence, Stakeholders are expected to operate with the same high moral and ethical standards as in person, treating others with the utmost dignity and respect.

### **8. DATA PROTECTION AND PRIVACY:**

#### PROTECTION OF COMPANY ASSETS

Stakeholders have an obligation to protect Chase's confidential and proprietary information and to respect the integrity of Chase's electronic systems.

Stakeholders will use all equipment with the utmost care and report any issues or malfunctions to the appropriate party. Stakeholders will not use equipment that they are not trained or permitted to operate. Stakeholders will not use the equipment for personal reasons.

#### PROPRIETARY INFORMATION

All ideas, concepts, processes, discoveries, improvements, and inventions conceived, discovered, made, designed, researched, or developed by Chase Stakeholders, either solely or jointly with others, during employment, which relate to the then-existing or prospective business of Chase or resulting from or suggested by any work Stakeholders do for the Company are the sole property of Chase. This includes potential patents and intellectual property related in any way to your employment.



### CONFIDENTIALITY

Confidential information includes all non-public information that might be of use to competitors or harmful to Chase, its Stakeholders and Trusted Partners if disclosed.

In the course of employment, Chase Stakeholders are given access to, and entrusted with confidential information belonging to the Company and third parties in contractual relationships with the Company.

Stakeholders are expected to maintain the confidentiality of Chase's trade secrets and private or confidential information. Trade secrets may include information regarding the development of systems, processes, products, know-how, and technology.

As applicable, all Stakeholders have either agreed to comply with the provisions of a Confidentiality, Non-Solicitation, Patents and Inventions Agreement with Chase or those obligations set forth in the employee handbook regarding confidential and proprietary information owned or in the possession of the Company. Stakeholders are obligated to comply with the terms of these agreements, even after the termination of their employment.

Exceptions to this section come into effect when disclosures are specifically authorized by Chase's Legal Counsel or where required as a matter of law. Any subpoenas or requests for disclosures of confidential information should be deferred to Chase's Legal Department.

### RECORD MAINTENANCE

The Chase Records Retention Policy ("Retention Policy") sets forth guidelines governing the retention and disposal of Chase business records. The Retention Policy requires that you maintain records in accordance with the Corporate Records Retention Schedule ("Retention Schedule"). The Retention Schedule identifies the Company records that we must retain and the retention period for each record type. You must not retain records that are not identified on the Retention Schedule unless the records have a current business purpose or the Chase Legal Department has instructed that the records be retained or preserved. You are responsible for reading and abiding by the Retention Policy and Retention Schedule. Please be advised that if you receive a Legal Hold Notice, the processes noted in the Retention Policy should be suspended regarding certain or all Chase documents that you have in your possession. Chase Stakeholders take due diligence in carefully and completely recording data pertinent to their role. This enables us to promptly provide information to our customers and stakeholders.

Accurate and reliable financial and business records are of critical importance in meeting Chase's financial, legal, and business obligations. Chase's financial books, records, and statements must properly document all assets and liabilities and accurately reflect all Company transactions. No false entries are ever permitted in Chase's books or records for any reason. All financial transactions are completely, accurately, and timely recorded to ensure proper accounting.

Trusted Partners must ensure that adequate and effective management systems, policies, procedures, financial documentation, and training are in place to ensure ongoing compliance. In addition, periodic auditing of our suppliers will be used to verify compliance with Chase





requirements. We reserve the right to request information from Trusted Partners concerning the management of relevant issues outlined in this Code.

### PRIVACY

Chase and its stakeholders are committed to complying with all applicable privacy laws, including GDPR, in the handling of all personal data with the utmost care, and ensuring its confidentiality, integrity, and availability. Chase and its Stakeholders will only process data in accordance with lawful bases, collect only necessary data for specified purposes, and implement appropriate security measures to protect against unauthorized access. Chase and its Stakeholders further pledge to respect individuals' data privacy rights, including their right to access, rectify, erase, and restrict processing of their personal data, and to report any potential data breaches promptly. Chase has implemented a number of technical, organizational and legal mechanisms to protect personal data, which are proactively monitored, reviewed and updated to ensure compliance with applicable laws, policies and procedures.

## **9. INTELLECTUAL PROPERTY**

Besides our Stakeholders, Chase's most important assets are its intellectual property rights, which include Copyrights, Patents, Trademarks, and Trade secrets. We are each responsible for protecting Chase's intellectual property rights by complying with Chase's policies and procedures for their protection. Maintaining the confidentiality of Chase's trade secrets and proprietary information is an important element of such protection. This obligation continues even after you leave Chase.

## **10. COMPLIANCE:**

We all work together to ensure timely and consistent actions against violations of this Code. Any instances of abusive, harassing, unethical, unlawful, or otherwise unacceptable behavior is strictly prohibited and should be promptly reported.

Chase Corporation does not tolerate retaliation of any kind, and anyone who engages in such will be subject to disciplinary action.

## **11. REPORTING:**

Chase Corporation encourages open communication so problems can be discussed and resolved in a mutually respectful atmosphere. Doing so makes Chase a safer place to work.

When you have a question or concern, you may:

1. Talk to your manager, another member of management, or Human Resources.
2. Contact Chase's Legal Department at [lawdepartment@chasecorp.com](mailto:lawdepartment@chasecorp.com)
3. Make an anonymous report using the third-party anonymous reporting:

### Hotlines:

US: 1-844-308-2520

UK: 0-808-189-3397

France: +33-975182302





China: 400-120-4933

Email: TellChase@GetInTouch.com

Via the web:

[https://www.lighthouse-services.com/\\_StandardCustomURL/LHILandingPage.asp](https://www.lighthouse-services.com/_StandardCustomURL/LHILandingPage.asp)

## **12. INVESTIGATING:**

Chase treats all reports of violations of our Code or the law seriously. Chase will appropriately investigate reports of misconduct. All Chase Stakeholders are expected to be honest and fair during investigations. All investigations are confidential.

All Chase Stakeholders are expected to comply with governmental investigations. Destruction of documents or evidence nor misleading statements are strictly prohibited.

In the event of an investigation or request for information, the Stakeholders must promptly notify the Chase Legal Department.

## **13. WAIVER:**

Any request to waive any provision of this Code of Conduct shall be granted only under exceptional circumstances. Said waiver may only be made by the Board of Directors and will be promptly disclosed in accordance with applicable law.

Policy Dated:	1/1/2025
Policy Review:	Every 2 Years