



## Corporate Code of Ethics and Business Conduct

### A. PURPOSE

It is Kymera International's policy to conduct business with the highest standards of integrity and in accordance with all applicable laws. Employees are expected to deal fairly and honestly with each other, as well as with our vendors, customers, and other third parties.

All companies of the group (ACuPowder, ECKA Granules and SCM Metal Products) will be referred to collectively as the "Company", or, "Kymera International", or, the "Corporation".

Any act of unethical business conduct, dishonesty, theft, violation or disregard of company policies and procedures established to protect company assets or its employees may result in disciplinary action up to and including discharge and may also result in legal prosecution. Compliance is mandatory and each employee as a condition of employment has the responsibility to ensure that all employees comply with this policy and to report instances of noncompliance.

### B. ETHICAL BUSINESS CONDUCT

Kymera International and its employees shall conduct company business affairs honestly, impartially, and in an ethical manner that avoids even the appearance of conflict between personal interest and those of the Corporation. Any conduct that may raise questions as to the company's integrity or character, damages its reputation, or creates the appearance of illegal, unethical, or improper conduct is prohibited.

As a global company, Kymera International is dedicated to abiding by the applicable laws that govern international trade. If an employee's work consists of carrying out any form of international work, they responsible for confiding in their manager to ensure absolute certainty that any international business transactions conform to the bounds of the applicable laws for that situation. If neither employee nor manager is certain that the applicable laws are being followed, then the employee will be responsible for seeking aid through a higher authority.

### C. CONFLICT OF INTEREST

The Kymera International Code of Ethics and Statement of Policy governing conflicts of interest provides that all Kymera International employees in all facets of their duties with the Corporation must act solely in the best interest of the Corporation to the exclusion of personal preference and private gain. Generally, a conflict of interest means engaging in any conduct or activity, investment, outside employment, romantic or other personal relationships, or obligations (including relationships with family members, relatives, friends, and social /business acquaintances) which could cause an employee to use his or her



position and influence within the Corporation for personal gain or for the benefit of others instead of the best interest of the Corporation. While it is simply not possible to identify all situations which could involve a conflict of interest, reasonable business judgment should be sufficient to evaluate most situations. In the event you are unsure whether a particular situation creates a conflict of interest, you should obtain a determination from Kymera International's Human Resources before engaging in the activity. The company's policy on conflicts of interest generally addresses the following areas.

1. The direct and indirect acquisition or ownership of any stocks, bonds, notes or other financial instruments of obligation in a company that is a competitor, vendor, or customer of Kymera International. This situation would not apply to normal holdings of securities or other obligations of a company whose securities are publicly traded.
2. Being employed by or rendering service to another organization where such employment or service is detrimental to Kymera International's interest.
3. Seeking or accepting, directly or indirectly, any gift from those doing business with or seeking to do business with the Corporation.
4. Engaging in, authorizing, or causing another to authorize a Kymera International's business transaction with a relative or any business organization with which the employee's relative is associated.
5. Relationships (including any romantic or other personal relationships) within a supervisory chain that might impair an employee's independence or judgment, or create or result in disruptions in the workplace, or other performance related problems, or create the appearance of such.
6. Misusing or improperly sharing with others information which constitutes trade secrets or is property ("inside information"). This includes trading in the Corporation's securities on the basis of "inside" information.

#### **D. COMPLIANCE WITH LAWS AND REGULATIONS**

Kymera International is subject to various federal, state and local laws and regulations and foreign laws, customs, and social standards. The Company requires its employees to comply with both the letter and spirit of all applicable laws, regulations, and customs and social standards wherever company business is conducted either on or off property.

Any violations of any federal, state, local or foreign laws, regulations, customs, or social standards must be immediately reported to Kymera International's Human Resources in addition to the employee's immediate supervisor. The following outlines several legal areas which affect company employees and operations.



## **1. ANTITRUST**

The antitrust laws regulate Kymera International's relationship with its vendors, customers, and competitors. Generally, these laws prohibit agreements, arrangements, and activities which may have the effect of reducing competition and pose significant risk to the company, its employees and shareholders for noncompliance. Penalties for violations are severe. Employees may not enter into agreements, arrangements or otherwise engage in any activity with vendors, customers, and/or competitors, which may lessen or restrain competition in violation of applicable law. In addition, employees should be extremely sensitive about any contact with a competitor or its employees, absent a valid, lawful purpose.

## **2. EQUAL EMPLOYMENT OPPORTUNITY/ WORKPLACE ENVIRONMENT**

It is Kymera International's policy to adhere to the principal of equal employment opportunity and to afford equal employment opportunity to qualified individuals regardless of their race, religion, color, national origin, age, sex, disability, sexual orientation, martial or veteran status. This policy applies to all phases of the employment relationship including hiring, promotions, selection for training programs, compensation, administration and benefit programs. In addition, the company is committed to providing its employees a workplace that is free from discrimination, harassment, or personal behavior not conducive to a productive work environment.

## **3. ENVIRONMENT**

At Kymera International we are committed to caring for and safeguarding our environment. The Corporation constantly seeks balance between environmental consideration and our business goals. As a result, we strive to comply with all environmental laws and regulations.

## **4. SAFETY AND HEALTH**

Kymera International's Safety and Health Policy sets high standards for protecting the health and safety of our employees and neighbors. It is the company's policy to comply with all applicable laws and regulations, to implement programs to help insure compliance, and conduct business operations in such a manner as to protect health and safety.

- i. Additionally, the consumption of alcohol and/ or drugs while working is incompatible with the health and safety of our employees, and we do not condone it. Employees also may not use or possess illegal drugs or



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controlled substances on the work premises. An employee may never report to work under the influence of alcohol, illegal drugs, or controlled substances.

- ii. Under no circumstances may an employee bring a weapon onto Company premises. There is a zero tolerance rule in regards to any level of violence, threat, or harassment, as we are dedicated to providing a violence-free and safe work environment.

## **5. SLAVERY, HUMAN TRAFFICKING, AND CHILD LABOR**

Kymera International does not tolerate or condone human trafficking, slavery, forced labor, or unlawful child labor. Therefore, we implement heavy measures to prevent this from occurring. We expect employees, contractors, subcontractors, vendors, suppliers, partners, and others with whom the Company conducts business with, to uphold the same standards in regards to this subject.

## **6. CUSTOMS AND CONTROLS**

Export control and customs laws regulate where and how Kymera International may sell products and exchange information. Kymera International fully complies with all export control and customs laws and all regulations requirements. These laws may prohibit doing business in certain countries, or impose requirements for licenses before products may be exported or exchanged. Customs laws require accurate documentation and proper reporting and valuation of products.

## **E. INTELLECTUAL PROPERTY / CONFIDENTIAL AND PROPRIETARY INFORMATION**

All Kymera International information is the exclusive property of Kymera International and its subsidiaries. Intellectual property and confidential and proprietary information includes without limitation: concepts or ideas developed by Kymera International employees, whether of a patented invention, manufacturing know-how, financial information, marketing reports and strategy, policy manuals, computer data and software, drawings, customer, vendor and employee files, price and profit data, forecast and business plans, pending acquisitions or development plans. No employee shall make any unauthorized use or disclosure of any of Kymera International's intellectual property or other confidential and proprietary information.

### **1. DATA SAFETY**

**Kymera International prides itself on providing the upmost care for our employees, contractors, subcontractors, vendors, suppliers, partners, and others with whom the Corporation conducts business. We ensure that their private information is securely protected. Therefore, we are implementing new regulations in alliance with the GDPR and other data protection laws to safeguard all personal data that the Corporation collects.**



## **F. USE OF COMPANY ASSETS**

Each employee is responsible for ensuring that Kymera International assets, such as cash, trademarks, trade names, property image, merchandise, materials, equipment, supplies, information, and the services of Kymera International personnel are used solely for legal and proper purposes. The use of Kymera International assets for improper, illegal or non-Kymera International purposes is prohibited.

## **G. PRODUCT QUALITY AND SAFETY**

All operating units of Kymera International have the responsibility to design, manufacture and deliver quality products. All required inspections and testing operations must be properly completed. Likewise, all company products must be designed, produced and delivered with the safety and health of our customers and product users as a primary consideration.

## **H. RELATIONS WITH SUPPLIERS AND CUSTOMERS**

Suppliers and customers as well as potential suppliers and potential customers, are to be treated honestly and fairly. Purchases and sales shall be made on an impartial basis and are to be based on legitimate business reasons. Supplier and customer relationships shall be above board and kept at arm's length.

Employees may accept or offer normal business courtesies, such as meals, that facilitate the discussion of business, advance good business relations or serve some other demonstrable business purpose. Such courtesies must be within the bounds of good taste, moderation and common sense. Soliciting or demanding, either directly or indirectly implied, anything of value in connection with any business transaction or relationship involving Kymera International is prohibited. In addition accepting or offering anything of value with the intent to be influenced or rewarded, or with the intent to influence another, in connection with any business transaction or relationship involving Kymera International is prohibited.

Gifts, gratuities, awards, merchandise and /or other incentives of nominal value may be accepted or offered to suppliers and customers, as well as potential suppliers and potential customers, with whom an employee maintains an actual or potential business relationship. The acceptance or offer of cash or cash equivalents, stocks, bonds, or other securities, promissory notes, or other similar form of monetary or financial gift, gratuity, or award is absolutely prohibited. Any such attempted monetary or financial gift, must be immediately reported to the employee's immediate supervisor as well as Human Resources. An employee may engage in reasonable entertainment with current or potential suppliers and customers. Such entertainment should be in accordance with legitimate business objectives.



All supplier paid and /or customer paid trips which have entertainment as the primary purpose for the trip (such as hunting, fishing, golfing, skiing, etc.) must be approved prior to the trip by the employee's immediate supervisor. In order to approve such a trip the employees immediate supervisor must determine that that a valid and reasonable business purpose exists, the fair market value of such trip is not excessive and the purpose or expected result of the trip is not to influence the employee in future decisions and that the trip is within the bounds of good taste, customary practice and common sense.

## **I. RELATIONS WITH GOVERNMENT EMPLOYEES**

The rules and regulations governing the conduct of federal employees generally prohibit contractors from providing gifts, gratuities or anything of value to federal or state employees. Accordingly, it is Kymera International's policy that no entertainment, meals, gifts, gratuities, discounts or other business courtesies may be offered or provided to federal, state, local or foreign government employees except for an occasional cup of coffee or soft drink if normally provided as part of an operations general visitor hospitality offering. All relations with government or political officials should be conducted in a respectful and courteous manner that will not adversely reflect on Kymera International or the government official's integrity, and with expectations that all such actions will become a matter of public knowledge.

## **J. ILLEGAL OR IMPROPER PAYMENTS**

Employees are prohibited from giving, offering or accepting any personal payment of any kind, whether of money, services, property or any other item of value, to or from any employee, officer, agent or representative of any private or public organization, or any person seeking to do business with Kymera International. Bribes, kickbacks or any form of such payment to any such individual or person for the purpose of obtaining business or business concessions are strictly prohibited. Any person receiving a demand or any offer of bribe, kickback or any other form of payment or improper consideration must report the demand immediately to the employee's immediate supervisor as well as Human Resources.

Kymera International prohibits money laundering or any activity that aids money laundering or the funding of terrorist or other criminal activities. Before establishing any business relationship, Kymera International and its officers or employees will check all applicable information (including financial information) on potential business partners to verify that they are reputable and involved in a legitimate business. The Company shall always comply with the pertinent anti-money laundering laws and regulations.





## **K. POLITICAL CONTRIBUTIONS**

Kymera International will comply with all national, state and local laws regarding corporate participation in political affairs including contributions to political, national political committees or individual candidates. No employee shall make any political contribution or pledge of such contribution or other expenditure to any political organization or candidate for political office on behalf of Kymera International. Employees may, of course, make personal political contributions to any organization, candidate for political office, so long as the employee does not represent such contribution is from Kymera International. Any personal political contribution shall be the sole personal responsibility of the employee and Kymera International shall not assume or accept any responsibility for such contributions.

No employee shall make any personal political contribution with the purpose of assisting Kymera International to obtain or retaining business or with the purpose of influencing any decision of any government official, or agency for Kymera International's benefit. Kymera International's assets, services and property, including Kymera International's letterhead and stationary, shall not be used to facilitate personal political contributions.

## **L. REPORTING / DISCLOSURES**

It is each employee's personal responsibility to bring any activities that appear to be inconsistent with or in violation of this Policy to the attention of his/her supervisor, Human Resources Manager, Plant Manager or the Vice President. Kymera International will make every effort to keep the reporting employee's identity confidential and ensure that no adverse action or retribution of any kind will be taken against an employee based upon his / her proper reporting of any suspected unethical activities.

## **M. VIOLATIONS OF POLICIES AND DISCIPLINARY ACTION**

Violations of Kymera International policies and the ethical principles set forth herein could subject an employee to appropriate disciplinary action up to and including discharge. In addition, any such violation may also violate federal, state, local or foreign laws and could subject the employee to individual civil or criminal prosecution with potential damages exposure and imprisonment.