



Chemours™



# Chemours Code of Conduct

**Living Integrity.  
Living Chemistry.**

# A Note from Mark



Colleagues,

As a founding member of the Chemours Executive Team, I vividly recall our early conversations about the kind of company we wanted to build and the five corporate values that would shape our success. Fast forward to today. As Chemours CEO, I am proud to say that we have not wavered from that path. Customer centered, refreshing simplicity, collective entrepreneurship, safety obsession and unshakable integrity are—and will always be—the essence of who we are and how we operate.

Our values have helped us create a culture where every one of us is encouraged and empowered to act like an owner, innovate, and make decisions that are in the best interest of our customers and shareholders, while protecting our people and our communities. Of course, we live in a complex world where at times the choices we face in this pursuit can make it difficult to navigate.

Our Code of Conduct is our ethical compass. It provides a clear and guiding light that will always lead us to do the right thing. It is critical not just to read it, but to understand, embrace, and live its principles every day.

A handwritten signature in black ink, appearing to read 'M. Newman'. The signature is stylized with a long horizontal line extending to the right.

**Mark E. Newman**

President and Chief Executive Officer  
The Chemours Company

# Our Purpose

We help create a colorful, capable, and cleaner world through the power of chemistry.



## Colorful

Making the everyday world brighter and more vibrant with our advances in Titanium Dioxide.



## Capable

Making processes more efficient and productive with Thermal & Specialized Solutions, Advanced Performance Materials, and Chemical Solutions.



## Cleaner

Providing products and application innovations that have a positive impact on peoples' lives and as little impact as possible on our planet.

# Values

## Create the Chemistry of Chemours

Chemistry powers our company, but values are what guide us. Our values are simple yet powerful, and our focus on delivering efficiency and results for our customers never overshadows our commitment to ethical behavior in all we do. When we do what's right for our people, customers, shareholders, and communities, success will follow.



### Customer Centered

Drive their growth, and ours, by understanding their needs and building long-lasting relationships.



### Refreshing Simplicity

Cut complexity, invest in what matters, and get to results faster.



### Collective Entrepreneurship

Act like you own the business, while embracing the power of inclusion and teamwork.



### Safety Obsession

Live our steadfast belief that a safe workplace is a profitable workplace.



### Unshakable Integrity

Do what's right for customers, colleagues, and communities—always.



# We Live Our Code

“We believe firmly that long-term growth and unshakable integrity go hand in hand. Doing the right thing always is a fundamental success factor for Chemours.”



**Sameer Ralhan**

Senior Vice President,  
Chief Financial Officer

The Chemours Code of Conduct applies to all of us—employees, officers, and directors. Its purpose is to guide us in making thoughtful, ethical decisions on behalf of Chemours, and it helps us uphold consistently high standards in everything we do.

This Code should guide all of us on ethical matters in our businesses, in our subsidiaries, and in operations where Chemours has a controlling interest. We want business partners—including joint ventures and third parties—to share our commitment to principled behavior and following the law. We expect them to understand and follow the Chemours Code of Conduct, and to be partners in our commitment to unshakable integrity.

Our spirit of collective entrepreneurship includes upholding Chemours values in our daily behavior and expecting the same of others.

- We lead by example, set high standards in our personal actions, and help make colleagues aware of the Code and its importance.
- We help our colleagues comply with the Code’s requirements and its spirit.
- We refer to the resources in this Code to guide our ethical decisions, and ask for help when we are uncertain. We are all responsible to speak up about issues that concern us.
- We communicate our Code to contractors, agents, distributors, and other business partners, and expect them to uphold it when working with us or on our behalf.

For additional resources for employees, [click here](#).





# We Speak Up

“When we do what’s right for our customers, shareholders, and communities, we are confident success will follow.”



**Ed Sparks**

President, Chemours  
Titanium Technologies and  
Chemical Solution

We all have a duty to protect our culture of unshakable integrity. Everyone must be prepared to say something if violations of our Code of Conduct are known, seen, or suspected.

We also speak up when we have questions or concerns. We talk to each other and to our managers, and if we need to, we use the Ethics Hotline for confidential assistance.

- We raise a concern if we believe there has been a possible violation of the Code of Conduct or of any law or regulation and cooperate fully should there be a company investigation.
- We do not tolerate threats, intimidation, or retaliation against anyone who in good faith raises a concern or reports suspected misconduct. Speaking up about a good faith concern is always the right action to take.
- We expect contractors, agents, distributors, and other business partners to uphold the principles of the Chemours Code of Conduct when working with or on behalf of Chemours.

## We find solutions together.

At Chemours, no one is expected to face an ethical dilemma alone. Immediate managers are often our first and best resources because they are the most familiar with individual roles and duties. Anyone who is uncomfortable speaking to a direct supervisor can address concerns in many other ways, including:

- Business, Function, or Site Leadership
- Legal, Finance, or HR representatives
- A Compliance Officer or Ethics Champion
- The Chemours Ethics Hotline

For additional resources for employees, [click here](#).



We Speak  
Up

## The Chemours Ethics Hotline

The Chemours Ethics Hotline is:

- Operated by an independent company
- Open 24 hours a day, seven days a week
- Available in more than 200 languages toll-free

In many jurisdictions, it is possible to contact the Ethics Hotline anonymously. Reports will be kept confidential to the fullest extent possible consistent with the law and good business practices.

Ethics Hotline (US & Canada): 1 844 499 4607

For countries outside of the US or to make your inquiry online, [click here](#)





# How to Consider an Ethical Issue

When facing an ethical dilemma, we ask ourselves the following questions:

- Is it the right thing to do?
- Is it legal?
- Is it consistent with the letter and the spirit of our Code of Conduct?
- Would I feel good if my action appeared in the news or on the Internet?

If you have any doubt about the answers to any of these questions, stop and seek guidance from the resources listed in this Code.

## We Speak Up

### Ethics Hotline

US & Canada:  
1 844 499 4607

For countries outside of the US  
or to make your inquiry online,  
[click here](#)



# We Abide by Laws and Regulations

Regardless of where we work, we follow all applicable laws, rules, and regulations, even though they may be complex and subject to change. This is also true when laws differ from country to country.

- While we are not expected to be experts in all areas of the law, each of us is responsible for learning, understanding, and complying with laws that apply to our location and role.
- If we are uncertain about which laws or regulations apply to us, or how best to follow them, we should seek help.

Because no code of conduct can cover every possible situation, Chemours relies on each of us to use good judgment and to speak up and ask for help when we have questions or concerns.

For additional resources for employees, [click here](#).

## Speak Up

If you see or suspect illegal behavior, say something. We do not tolerate retaliation or intimidation for reporting a violation.



# We Believe in a Fair Marketplace.

Our responsibility to conduct business ethically extends to our relationships with customers, suppliers, competitors, regulators, and shareholders. We always compete within legal boundaries on the basis of price, quality, and service, and we expect our partners to do the same.

- We follow all antitrust and competition laws in countries where we operate.
- We do not enter into agreements or understandings that interfere with fair trade, including:
  - Fixing or controlling prices and credit terms
  - Rigging bids
  - Boycotting suppliers or customers
  - Allocating products, territories, customers, or markets
  - Limiting the production or sale of products
- We gather competitive data responsibly, using publicly available information.
- We always do our best to treat customers, suppliers, and competitors fairly. We do not engage in misleading or deceptive trade practices.
- We make sure we have the required approvals before accepting any external invitation to share Chemours expertise or information.

## **We ask before we act.**

We consult Chemours legal advisors before meeting with competitors, developing price communications, participating in trade association meetings, or collaborating with third parties in research or manufacturing.

For additional resources for employees, [click here](#).



# We Stand Firm Against Corruption

"You can't look at every decision, but you can set a standard of integrity for every decision."



**Dave Shelton**

Senior Vice President,  
General Counsel and  
Corporate Secretary

Our commitment to unshakable integrity means we all play a part in the effort to eliminate bribery and corruption worldwide. We follow anti-bribery and anti-corruption laws and expect our business partners to do the same. Because corruption—or even behavior that could *appear to be* unethical—can take many forms, it is important to be aware of situations that must be avoided.

- We do not offer, pay, or accept bribes, kickbacks, or other improper payments under any circumstances, whether dealing with commercial or governmental customers.
- We are conscientious when dealing with government officials to avoid even the appearance of impropriety. This includes government employees, political officials or candidates, employees of state-owned enterprises, and their relatives.
- We do not use illegal or inappropriate means to win business or obtain preferential treatment for Chemours. This includes improperly securing favorable tax or customs treatment, receiving permits or regulatory approvals, or bypassing laws or regulations.
- We discourage the giving and receiving of gifts.
  - We ensure that any permissible gift or entertainment has a clear business purpose and will not be seen as an attempt to improperly influence an official decision.
  - We understand that inappropriate “gifts” can include anything of value, including favors, services, meals, gifts, entertainment, travel, charitable contributions, offers of employment, or other profitable opportunity.
  - We seek guidance from our legal advisors if we are unsure whether a recipient is a government employee or official.
- Regardless of local practice, we do not make “facilitation payments” or small bribes to individuals to secure a routine government service.



# We Stand Firm Against Corruption

In addition to avoiding situations that could put us at risk, we follow these principles to demonstrate our commitment to ethical business practices:

- We are able to demonstrate the business purpose of our relationships and show that our payments are consistent with the value of goods or services provided.
- Our books and records accurately reflect the value and nature of all transactions.
- We regularly evaluate business partners and stop working with them if we suspect corrupt practices.

For additional resources for employees, [click here](#).





# We Do Not Engage in Insider Trading

We may have access to nonpublic information (“inside information”) about Chemours that could affect the value of Chemours or other companies’ securities. Trading in Chemours securities when we have inside information or sharing inside information with others can be illegal and result in severe individual penalties.

- We do not discuss inside information about Chemours or any other company except as required by our regular employment duties, and we do not post inside information on social media.
- We do not spread false information about Chemours or any other company.
- We do not trade Chemours securities or the securities of any other company based on inside information.
- We direct outside inquiries about Chemours to Corporate Communications, Investor Relations, or authorized managers.

For additional resources for employees, [click here](#).





# We Keep Complete and Accurate Records

We keep accurate records because it is good business practice and also because good records reinforce other ethical behaviors. That's why at Chemours, we ensure our financial and nonfinancial information is recorded promptly, accurately, and securely.

- Our records—including time records, expense reports, invoices, financial entries, benefit claims, and safety records—are carefully reviewed, authorized, recorded, and reported.
- We ensure that all records accurately and fairly reflect the underlying transaction.
- We follow our internal record-keeping policies to ensure that transactions are recorded accurately and promptly, and are supported by all necessary documentation.
- We follow the law and our retention policies when producing, storing, or destroying records and documents.
- We get the necessary Chemours approvals when responding to requests for information from a government or regulatory agency.

When keeping records, we do not:

- Make false or misleading entries
- Omit or conceal payment amount or purpose
- Keep undisclosed or unrecorded funds, accounts, or assets
- Knowingly allow illegal activities to occur

For additional resources for employees, [click here](#).

## Speak Up

If you have concerns about accounting or record-keeping, share them with Finance Management or through other appropriate channels. We do not tolerate retaliation or intimidation for reporting a violation.



# We Obey International Trade Laws

We obey the trade laws of the United States and all countries in which we operate, including laws concerning:

- The import or export of goods, services, or technology
- Government licenses or other approvals required to conduct transactions
- Sanctions prohibiting transactions with specific countries, companies, or individuals
- Product classification, valuation, and labeling

We follow all Chemours policies and processes when conducting international transactions.

- We report requests to boycott other countries or companies.
- We monitor and comply with Chemours business travel advisories.
- We are careful to avoid the possible diversion or re-export of our products or technologies to companies or individuals we ourselves would not do business with.
- We do business only with companies and business partners who obey international trade laws and respect Chemours policies.

For additional resources for employees, [click here](#).



# We Act in the Best Interests of Chemours

A conflict of interest occurs when an individual's private interest interferes with the interests of Chemours as a whole. It is important to not only avoid conflicts of interest, but also to disclose any situation that could even *appear* to create a conflict of interest.

A conflict can arise:

- When we take actions or have interests that may make it difficult to perform our work objectively and effectively
- When we, or members of our families, receive improper personal benefits as a result of our positions in the company
- When we, or members of our families, receive loans or personal guarantees from the company

We speak up and seek answers from our management when we have a concern about a potential conflict of interest.

Examples of potential conflicts of interest include:

- Working for competitors, customers, or suppliers while an employee of Chemours
- Doing business with relatives, especially those who are government officials
- Engaging romantically with someone in a reporting relationship
- Accepting gifts or entertainment from suppliers, customers, agents, or others seeking to do business with Chemours
- Making investments (or having close relatives make investments) that could influence or appear to influence our judgment
- Serving as a board member of another organization
- Pursuing business opportunities we discover through Chemours for personal gain

For additional resources for employees, [click here](#).



# We Spend Money in the Best Interest of Chemours

Our entrepreneurial spirit and individual power to act come with the responsibility to use Chemours resources with care. That's why we monitor our spending for the company carefully, and speak up if we see Chemours funds misused.

- We do not use Chemours assets, information, property, or influence for personal gain.
- We use company funds efficiently and make sure Chemours receives full value for any spending.
- We understand the Gift & Entertainment policy and seek guidance or approval before giving or accepting anything of significant value.
- We support our personal community activities on our own time, with our own resources, and not as representatives of Chemours. We obtain authorization before making any donation in the name of Chemours.
- Our executive officers immediately disclose to the General Counsel and, if applicable, the Audit Committee any transaction or relationship that may result in a conflict of interest.

We disclose to our supervisor situations that might create a conflict—or even the appearance of a conflict—where we, our families, our friends, or our business associates might profit based on our association with Chemours.

For additional resources for employees, [click here](#).

## Speak Up

### Ethics Hotline

US & Canada:  
1 844 499 4607

For countries outside of the US  
or to make your inquiry online,  
[click here](#)



# We Respect Privacy and Keep Personal Data Safe

It is our responsibility to handle personal data in a secure manner, and to observe all laws, policies, and precautions to keep it safe.

- We vigorously protect all personal data.
- We handle the personal data of our employees, customers, vendors, and third parties with care and according to the law, the Chemours Privacy Policy, and our obligations to our partners and customers.
- We use personal data only as necessary for business purposes and share it on a limited, “need-to-know” basis.
- We protect personal data from unauthorized disclosure.

For additional resources for employees, [click here](#).



# We Respect One Another

"I believe that behind our innovative chemistry, our culture, which celebrates diversity of backgrounds and ideas, enables us to do what we do best."



**Alvenia Scarborough**  
Senior Vice President,  
Corporate Communications  
and Chief Brand Officer

At Chemours, we respect and treat one another with fairness, courtesy, and dignity. We embrace the power of inclusion and teamwork as a key part of our entrepreneurial spirit and our drive to give our customers the best service we can.

- We believe that a diverse workforce is central to a vibrant, engaging, and creative workplace.
- Equal opportunity is part of our respectful workplace, and work-related decisions are never based on age, sex, race, color, religion, national origin, sexual orientation, gender identity, marital status, disability, or any other characteristic protected by applicable laws.
- We do not tolerate abuse or harassment of any kind, including sexual or racial harassment, or actions that are intimidating, discriminatory, or offensive.
- We engage in respectful interaction with one another, and we understand that the most respectful way we can treat one another is through honest and open dialogue.

For additional resources for employees, [click here](#).

## Speak up.

Discrimination or disrespectful behavior in your workplace must be reported to your supervisor, Chemours legal or HR representatives, or the Ethics Hotline. We do not tolerate retaliation or intimidation for good faith reporting of a suspected violation.

---

### Ethics Hotline

US & Canada: 1 844 499 4607

For countries outside of the US or to make your inquiry online: [click here](#)





# We Protect Company Assets

We value collective entrepreneurship, and recognize that this makes us all responsible for protecting Chemours assets. This includes both physical items and information—things like computers, IT systems, records, and data. We also protect Chemours intellectual property, such as brands, inventions, copyrights, and trade secrets.

We can identify and avoid potential risks when we follow Chemours asset protection policies:

- We review and follow security policies at our workplace and when we travel.
- We are conscientious about protecting company assets against damage, misuse, loss, or theft.
- We guard our intellectual property and respect the intellectual property rights of others.
- We secure our passwords and user ID credentials and defend against cyberattacks and other malicious activity.
- We understand that company assets, such as workplaces, equipment, computers, phones, and access to Internet and email, are intended for business purposes. As company equipment and systems are subject to monitoring, we do not expect privacy when using these assets, except as required by law.
- We do not visit Internet sites with offensive content, and we do not use company assets excessively for personal use.
- We do not use company resources to reproduce, display, distribute, or store materials that violate any party's trademark, copyright, licensing, or other intellectual property rights.
- We share Chemours assets outside the company only when authorized to do so. Trade secrets or other confidential information may be shared only under a written agreement.

## Speak Up

Any incident related to Chemours assets should be promptly reported to company line management, Global Security and/or IT. We do not tolerate retaliation or intimidation for reporting a violation.



# We Protect Company Assets

Further, when following our asset protection policies:

- We do not share business information on social media or other public forums.
- When handling confidential information, we encrypt it and share it only with authorized parties.
- We dispose of assets according to company procedures.
- We speak up and report any loss (or potential loss) of Chemours information or assets.

For additional resources for employees, [click here](#).



# We Protect Our Reputation

We all benefit from the Chemours public reputation of honesty and integrity. To uphold our reputation for unshakable integrity, our public communications are accurate, consistent, and responsible.

- We distinguish between business communication and personal communication—particularly in forums like social media—and we do not speak individually as representatives of Chemours.
- We adhere to Chemours values in our business communications.
- We recognize that only authorized persons should speak on behalf of the company with the media, the investment community, or government officials, and we contact Corporate Communications, Investor Relations, or Government Affairs for assistance when needed.

For additional resources for employees, [click here](#).



# We Participate in Political Activities Responsibly

Being part of our communities includes political involvement. We participate in political processes, but we keep our political activities separate from our roles as employees of Chemours.

- We have the right as individuals to personally participate in the political process, including making personal contributions. We are careful to make it clear that our views are our own and not those of Chemours.
- We work with Government Affairs to comply with laws regulating Chemours' participation in political affairs and activities—including political contributions and political campaigning.
- We seek approval from Government Affairs before using company funds or resources to support political candidates, engaging in lobbying activities, or using company locations or other assets for political purposes.
- We inform our managers when we—or our close relatives—seek public office, or if our political activity might have an impact on Chemours or on our jobs.

For additional resources for employees, [click here](#).



# We Insist on Safety and Sustainable Growth

We are steadfast in our obsession with safety, and we look out for our colleagues' well-being as well as our own. As individuals, we strive to be role models for working safely, promoting wellness, and caring for our environment. We believe that protection of people and the environment is one of our most significant responsibilities.

- We create and maintain safe work environments, and ensure the stewardship of our products for their intended uses. This care extends to our employees, contractors, communities, customers, and all stakeholders.
- We integrate safety, health, and care for the environment into our business planning and operating practices.
- We understand our responsibility to follow company policy and regulations that concern safety, personal protection, environmental compliance, and product stewardship. We expect the same from our business partners.
- We are committed to conducting our business in a manner that respects the rights and dignity of all people.
- We build relationships based on transparency and trust and continuously uphold our right to operate. We believe strategic alliances and partnerships with our communities play a significant role in achieving our commitment.

We believe this commitment to safety and sustainability ensures enduring success for ourselves, our company, our customers, and our stakeholders.

For additional resources for employees, [click here](#).





# The Chemistry for What's Next Starts Now

We are a company, dedicated to the power of chemistry.

A company that started with a 200-year heritage.

A company that's taking an age-old discipline and evolving it to shape markets, define industries, and change lives.

A company committed to working hand-in-hand with customers to develop new applications and industry-defining solutions.

A company dedicated to making a big impact while leaving a smaller footprint.

A company that makes ordinary things extraordinary.





# About the Chemours Code of Conduct

## Speak Up

### Ethics Hotline

US & Canada:  
1 844 499 4607

For countries outside of the US  
or to make your inquiry online,  
[click here](#)

The company reserves the right to modify the Code of Conduct as needed. Significant changes to this Code will be communicated broadly to employees and disclosed on the company's website.

Any waiver of this Code for executive officers or directors may be made only by the Audit Committee of the Board and will be disclosed as required by law.

Our Code does not alter the terms and conditions of employment and is not a contract. It details what is expected of everyone at Chemours and supports us in being responsible and respectful and conducting our affairs with integrity. We are all expected to report suspected violations unless following that process conflicts with local laws. Failure to comply with our Code may result in disciplinary action up to and including termination.

Retaliation for good faith reporting or questions will never be tolerated.

**We speak up.**



# Chemours™

Published: October 2021

