



Hemlock Semiconductor Operations LLC Code of Business Conduct for Suppliers

Hemlock Semiconductor Operations LLC (“HSC”) and its affiliates rely heavily on our strong relationships with our suppliers to run our businesses successfully. This Code of Business Conduct for Suppliers (“Code”) documents the basic principles and minimum expectations for supplier conduct. HSC is committed to these principles and expects its suppliers to be as well.

ETHICS & LEGAL REQUIREMENTS

HSC expects its suppliers to conduct their business as HSC strives to conduct its business – in an ethical and honest manner and in compliance with all applicable local, national, and international laws and regulations.

Avoid Conflicts of Interest: Suppliers will avoid any interaction with an HSC employee that may conflict, or appear to conflict, with that employee acting in the best interests of HSC. This includes, but is not limited to, offering payments, employment opportunities, or other favors to any HSC employee or HSC employee’s family or friends. To prevent a potential or perceived conflict of interest, an HSC employee or member of their family may not accept gifts, entertainment and/or other entertainment services from any individual or company desiring to do business with HSC if by doing so, the employee may be perceived as influenced to act other than in the best interest of HSC. Gifts or favors can include, but are not limited to, free service, loans, discounts, money, vacation trips, or items of value. Excluded are: articles of nominal value used for sales promotion; business lunches, dinners, or nominal entertainment that are customary in a normal business relationship.

No Bribery: Suppliers will not engage in any form of commercial bribery or otherwise offer any incentive to any HSC employee or HSC employee’s family or friends in order to obtain or retain HSC business. Suppliers will comply with the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, and all other local, national, international, or otherwise applicable laws and regulations dealing with the bribery of government officials.

Fair Competition: Suppliers will comply with all applicable laws and regulations regarding fair competition and antitrust.

Accurate Accounting and Business Records: Suppliers will keep, and provide to HSC upon request, accurate records of matters related to the supplier’s business with HSC.

Protect Information: Suppliers will protect HSC’s confidential information and act to prevent its misuse, theft, fraud, or improper disclosure. Suppliers must take all due care in handling, discussing or transmitting sensitive or confidential information that could affect HSC, its employees, its customers, the business community, or the general public.

HUMAN RIGHTS & LABOR

Respect for People is a core value of HSC. Therefore, we expect our suppliers to respect the human rights of all individuals and be committed to treat all of their employees with dignity and respect, in accordance with all applicable laws and regulations.

Respect Freedom of Association and Collective Bargaining: Suppliers will respect employees’ lawful right of free association, as well as their lawful right to join, form, or not to join a labor union or otherwise engage in collective bargaining.

No Forced and Compulsory Labor: Suppliers will not use, or knowingly do business with companies that use, forced or involuntary labor, including prison labor, indentured labor, bonded labor, or slave labor.

No Harassment and Abuse of Labor: Suppliers will ensure that their employees are not subjected to psychological, verbal, sexual or physical harassment or any other form of abuse, and will comply with all applicable laws and regulations on harassment and abuse of employees.

No Child Labor: Suppliers will comply with all applicable child labor laws and regulations.

No Discrimination: Suppliers will not discriminate in any condition of employment on the basis of race, color, national origin, sex, religion, age, disability, HIV/AIDS status, trade union membership, sexual orientation, or any other personal characteristic unrelated to job performance, and will comply with all applicable employment discrimination laws and regulations.

Appropriate Work Hours and Wages: Suppliers will comply with all applicable laws and regulations on work hours and overtime, as well as all applicable laws and regulations on wages and benefits.

ENVIRONMENT, HEALTH & SAFETY

HSC strives to operate in the most environmentally responsible and efficient manner and prides itself on providing a secure, safe, and healthy work environment for its employees. HSC expects its suppliers to make similar commitments to improve continuously their environmental, health, and safety performance.

Respect the Environment: Suppliers will comply with all applicable environmental laws and regulations. Suppliers will have systems in place to ensure safe management of waste, air emission, and wastewater discharges. HSC encourages suppliers to seek ways to minimize the use of nonrenewable resources, use all resources more efficiently, and minimize the environmental impact of their operations.

Protect Health and Safety: Suppliers will provide a safe and healthy workplace for their employees, including appropriate controls, training, work procedures, and personal protection equipment. Suppliers will comply with all applicable workplace health and safety laws and regulations.

COMPLIANCE

In addition to the legal standards mentioned in this Code, suppliers will comply with all other applicable laws and regulations in the provision of products or services to HSC. HSC expects suppliers to implement systems and controls to promote compliance with laws and the principles set forth in this Code, including policies, training, monitoring, and auditing mechanisms. Suppliers should also apply these or similar principles to the subcontractors and suppliers they work with in providing goods and services to HSC.

HSC reserves the right to assess and monitor suppliers' compliance with this Code. Suppliers who are not in compliance with this Code are expected to implement corrective actions or they may not be considered for future business.

REPORTING MISCONDUCT

Suppliers who believe that an HSC employee or anyone acting on behalf of HSC has engaged in illegal or otherwise improper conduct with respect to their business with the supplier should report the matter to HSC. Suppliers should also report any potential violation of this Code. Reports may be addressed to:

Steve Sklenar (Confidential & Personal)

Chief Financial Officer

Hemlock Semiconductor Operations LLC

P.O. Box 80

Hemlock, MI 48626

USA

HSC will not retaliate against a supplier who in good faith reports potential misconduct by a HSC employee or representative.

The information contained in this communication does not constitute an offer, does not give rise to binding obligations, and is subject to change without notice to you. The creation of binding obligations will occur only if an agreement is signed by authorized representatives of Hemlock Semiconductor Operations LLC or Hemlock Semiconductor, L.L.C. and your company. Any reference to competitor materials contained in this communication is not an endorsement of those materials by Hemlock Semiconductor Operations LLC or Hemlock Semiconductor, L.L.C. or an endorsement by the competitor of Hemlock Semiconductor Operations LLC or Hemlock Semiconductor, L.L.C. materials.

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