KRATON

SUPPLIER CODE OF CONDUCT



CEO LETTER

As a company that develops, manufactures and markets specialty polymers and biobased chemicals, Kraton strives to make a postive difference to our customers and our people, and to the world.

Kraton has adopted a <u>Code of Conduct and Business Ethics</u> applicable to all of our directors, officers and employees worldwide. We maintain a strong culture of compliance in support of that Code. Our Code and related policies and programs are designed to enforce strict compliance with laws and regulations applicable to Kraton wherever we conduct business, including, without limitation, laws related to fair competition, anti-bribery, international trade and those respecting human rights. Kraton has developed this Supplier Code of Conduct with the requirement that our trading partners will share the same culture of compliance embraced by Kraton, as evidenced by our Code, and abide by these same principles.

Together, we can all make a positive difference, when we work together to solve problems, deliver exceptional value, and enhance people's lives all over the world - the right way. We hope you will join us in this journey.



SUPPLIER CODE OF CONDUCT

Introduction

Kraton Corporation, together with its subsidiaries ("Kraton"), is committed to conducting business in an ethical, sustainable and responsible manner. Our strategic house is built on six foundational core values: Safety & Integrity, Creativity, Courage, Ownership, Teamwork, and Agility. Our corporate vision is: "We Create Innovative Solutions for a Sustainable Tomorrow"

Sustainability is core to Kraton's value proposition, as we deliver on our promise of <u>Sustainable Solutions</u>. Endless <u>Innovation</u>.™ As a critical component of this commitment, Kraton is a participant signatory enterprise to the <u>United Nations Global Compact</u> ("UNGC"). The Ten Principles of the UNGC cover Human Rights, Labor, Environment and Anti-Corruption. Committing to frameworks such as the UNGC and joining industry sustainability forums such as Ecovadis, Responsible Care and Together for Sustainability enables Kraton to stay abreast of the developing sustainability agenda and emerging best practices, and will bring us and our suppliers along in our sustainability journey.

Kraton's procurement mission is to facilitate the connection of customer needs with supplier solutions. By extending our core values (and our value chain) to sourcing, we create the opportunity for our suppliers to contribute to Kraton's sustainable value foundation by supporting business growth, improved productivity and risk management. Sustainable and ethical practice by our suppliers is an essential element of Kraton's commitment to the UNGC.

Kraton has developed this Supplier Code of Conduct ("Supplier Code") with the requirement that our trading partners and their trading partners share the same culture of compliance embraced by Kraton, abide by the principles

set forth below, and embrace and adhere to recognized environmental, social and corporate governance standards laid down in international conventions such as the UNGC.

I. Integrity and Ethics

Kraton expects our suppliers to conduct business ethically, with integrity, and in compliance with all applicable laws, rules and regulations.

Why it Matters

We are each responsible for holding ourselves to the highest ethical standards. Our reputation, and that of our suppliers, is built on our actions and those who act on Kraton's behalf. We expect our suppliers, regardless of location, to abide by the ethical standards contained in this Supplier Code, or the corresponding ethical standards in their own codes and policies.

How We Make a + Difference

We embrace ethical behavior by:

- **A. Avoiding Conflicts of Interest:** Suppliers must avoid any interaction with Kraton employees and third party representatives that may conflict, or appear to create a conflict, with the employees' and third party representatives' requirement to act in Kraton's best interest, ethically, with integrity and in compliance with laws, rules and regulations.
- **B. Avoiding Extortion and Bribery:** Suppliers may not engage in any form of extortion or commercial bribery or otherwise offer incentives or gifts to any Kraton employees or third parties, in order to obtain, retain or influence business with, or related to, Kraton.
- **C. Engaging in Fair Competition:** Suppliers must avoid agreements or actions that illegally restrain trade, restrict competition, or violate antitrust and competition laws.

- **D. Maintaining Fiscal Integrity:** Suppliers must maintain accurate books and records in compliance with all applicable laws, regulations, and contractual obligations.
- **E. Protecting Information:** Suppliers must ensure compliance with laws and directives relating to the protection, transfer, access, and storage of personal information. Suppliers must protect Kraton's confidential information to prevent misuse, theft and/or improper disclosure.
- **F. Complying with Global Trade Restrictions:** Suppliers must comply with all applicable laws, rules and regulations concerning trade embargoes or sanctions that restrict trade with individuals, businesses or countries, including those of the United States and European Union, and must ensure that all activities are conducted in full compliance with laws, rules and regulations that apply to the export or re-export of goods and technology, including those of the United States and the European Union.

II. SUPPLIED MATERIALS

Kraton expects our suppliers to be dedicated to responsible sourcing, and to be a reliable source of consistently high-quality materials that meet our expectations.

Why it Matters

Kraton is committed to sourcing all materials responsibly and in accordance with all applicable laws, rules and regulations. This is a critical component of our ongoing commitments to respect human rights, the environment and the communities that we serve. We reserve the right to conduct diligence regarding the activities of our supply chain partners to ensure compliance with our collective diligence and disclosure requirements, and ongoing compliance activities. We expect our supply chain partners to respect and support these efforts.

How We Make a + Difference

We uphold our commitment to responsible sourcing by:

A. Avoiding the Sourcing of Conflict Minerals: Suppliers must abide by Kraton's Conflict Minerals Policy and all applicable laws, rules and regulations related to Conflict Minerals. Kraton conducts regular inquiries of our suppliers to collect information necessary to facilitate reasonable country of origin inquiries and due diligence. We expect our suppliers to do the same with their suppliers.

B. Ensuring Certifications as Appropriate and Where

Available: For materials sourced from forest biomass, Suppliers must provide Kraton with reasonable assurances that those materials have been sourced from responsibly managed forests, including evidence of third party certification, where available.

III. HUMAN RIGHTS AND LABOR

Kraton expects our suppliers to respect the human rights of their employees and treat them fairly, in accordance with all applicable laws, rules and regulations.

Why it Matters

We protect the human rights and fair employment rights of individuals wherever we conduct business, and require our business partners to do the same. We aim to create a better tomorrow for our communities and our people by leveraging the strengths of individuals, and furthering a culture where people are valued and belong. Kraton upholds these commitments in our workplaces through our strong commitment to diversity, equity and inclusion, and by adhering to the principles contained in our Human Trafficking. Statement, copies of which are available on our website at www.kraton.com.

How We Make a + Difference

We uphold our commitment to protect human rights by:

A. Creating a Safe Work Environment: Suppliers must promote a work environment that values diversity

and inclusion and is free from unlawful harassment, discrimination, violence, threats of violence, or coercion.

- **B. Prohibiting Child Labor:** Suppliers must comply will all applicable child labor laws, and refrain from employing child labor in all of their global operations.
- **C. Prohibiting Forced or Compulsory Labor:** Suppliers may not use forced or involuntary labor, including prison labor, indentured labor, bonded labor or slave labor.

D. Respecting Wages, Benefits and Working Hours:

Suppliers must comply with all applicable laws governing wages, working hour requirements, compensation, benefits and overtime.

E. Respecting the Rights of Employees to Form or Join in Associations: Suppliers must respect the rights of all of their employees globally to form, join, or assist an association in representing their interests as employees, and their rights to self-organize and bargain collectively or individually.

IV. SUSTAINABILITY AND ENVIRONMENTAL, HEALTH AND SAFETY

Kraton is committed to respecting the environment and creating safe and healthy workplaces. We are committed to Responsible Care® and expect our suppliers to make similar commitments to continuously improve their environmental, health, and safety performance.

Why it Matters

Kraton's greatest asset is our people, and the safety of our people is our number one priority. Kraton is committed to safeguarding people and the environment by creating a safe workplace for our employees, and by continuously improving our environmental, health, and safety performance, and the security of our facilities, processes and technologies.

How We Make a + Difference

We uphold our commitment to the environment, health and safety by:

- **A.** Respecting all Applicable Environmental, Health and Safety Laws: Suppliers must comply with all applicable environmental, health and safety laws, rules and regulations, including those relating to occupational health and safety, hazardous materials, wastewater and solid waste and air emissions.
- **B. Enhancing our Sustainability Commitment:** Suppliers must aim to reduce the environmental impact of their business operations and promote the sustainability of natural resources. We expect our suppliers to be nimble leaders in the area of sustainability, and to grow their business operations to support and respect the evolving regulatory environment focused on the preservation of our planet and the communities that we and they serve.

V. COMPLIANCE

Kraton requires our suppliers to comply with the principles contained in this Supplier Code of Conduct in all of their global activities including, without limitation, in their role as a supplier of goods and/or services to Kraton. We reserve the right to assess and monitor our suppliers' compliance with this Supplier Code of Conduct.

VI. REPORTING

All Kraton suppliers should provide a confidential and secure mechanism for their employees and representative to raise grievances. Suppliers who believe Kraton employees or anyone acting on our behalf has engaged in illegal or otherwise improper conduct with respect to their business with the supplier should report the matter to their Kraton representative or confidential letter to: Kraton Corporation, 9950 Woodloch Forest Drive, Suite 2400, The Woodlands, TX 77380, Attn: General Counsel.

A supplier's relationship with Kraton will never be affected by a good faith report of potential misconduct.