



OUR CODE OF CONDUCT AND BUSINESS ETHICS





CONTENTS

TO ACCESS SPECIFIC CONTENT, SIMPLY CLICK ON THE CORRESPONDING SECTION.

▲ MESSAGE FROM CEO	3
▲ MAKING A +DIFFERENCE BEGINS WITH EACH OF US	4
Our Vision	5
Our Values	6
How We Make Ethical Decisions	7
Our Responsibilities	8
We Speak Up and Do Not Allow Retaliation	9
▲ TOGETHER WE ALL MAKE A +DIFFERENCE FOR...OUR COMPANY AND OUR STAKEHOLDERS	10
We Avoid Conflicts of Interest	11
We Protect Our Information Technology Systems and Hardware	13
We Recognize the Importance of Intellectual Property (IP) and Respect Others' IP	14
We Protect Our Reputation	16
▲ TOGETHER WE ALL MAKE A +DIFFERENCE FOR...OUR COWORKERS AND COMMUNITIES	17
We Promote a Safe and Secure Workplace	18
We Embrace Inclusion, Diversity and Non-Discrimination	19
We Promote Fair Employment and Human Rights	21
We Protect Privacy	22
We Ensure Sustainability	23
We Carefully Participate in the Political Process	24
▲ TOGETHER WE ALL MAKE A +DIFFERENCE TO...OUR CUSTOMERS, SUPPLIERS AND VENDORS	25
We Only Give or Receive Acceptable Gifts and Entertainment	26
We Compete Fairly	28
▲ TOGETHER WE ALL MAKE A +DIFFERENCE IN...OUR MARKETPLACE	30
We Prevent Corruption and Bribery	31
We Understand International Trade Compliance	33
We Prevent Insider Trading	34
We Keep Accurate Books and Records	36
▲ RESOURCES AND CONCLUSION	37

MESSAGE FROM CEO

At Kraton, our dedication to making a positive difference extends from our employees and customers to our suppliers and the broader community. Integrity is deeply ingrained in our activities, serving as a constant guideline that shapes all our business operations and relationships. We don't just set the bar at legal compliance; we aim for the pinnacle of ethical behavior. This includes honesty in our communications, fairness in our actions and accountability for our decisions. Integrity isn't just a buzzword for us; it's the backbone of all we do—from developing and manufacturing specialty polymers and biobased chemicals to how we interact with everyone connected to our business. It's a legacy I personally pledge to maintain as an enduring aspect of our corporate identity.

Our Company's Code of Conduct and Business Ethics, commonly referred to as the "Code," is the foundational guideline for conducting business. This Code outlines what is expected of each of us, irrespective of our position or seniority within the company. It's not just a document to be aware of; it's a set of principles that steers our daily actions and decision-making.

At Kraton, every individual must uphold our values and standards. If a situation doesn't seem right or leaves any uncertainty, we encourage and expect employees to speak up. We want everyone in Kraton to feel empowered to use their voice, as each voice contributes to our collective integrity. By working together, we can make a meaningful impact, deliver exceptional value, and improve lives around the globe—all while adhering to the highest ethical standards.

Marcello Boldrini
Chief Executive Officer



MAKING A +DIFFERENCE
BEGINS WITH EACH OF US



OUR **VISION**

We Create Innovative Solutions for a
Sustainable Tomorrow.



Our Code provides guidance to enable us to make ethical decisions and to do what's right for our culture and our community. Designed around our vision and core values, the Code is our ethical compass. It helps us navigate our decision-making to reach the best legal, compliant and respectful outcome.

OUR **VALUES**

Kraton Corporation, together with its direct and indirect subsidiaries and affiliates (the “Company” or “Kraton”), has established a thriving working environment. Part of what makes Kraton a global leader in our businesses is our dedication to our Core Values.

Click each value to learn more.



HOW WE MAKE **ETHICAL DECISIONS**

Occasionally, you may face an ethical or legal dilemma where the right course of action is unclear. If this happens, ask yourself the following questions:

← Is the action legal? →

← Is the action consistent with our Code, values and policies? →

← Does it feel right? →

← Would I be comfortable if my actions were made public? →

← Is it in the best interest of Kraton, our customers, coworkers and the community? →

← Would I accept my decision if I were affected? →

If you remain unsure about what to do, seek advice from a supervisor, the Legal Department or the Ethics Helpline. Remember, the only “bad” questions are the ones you do not ask.

LEARNING **TOGETHER**

To Whom Does the Code Apply?

Our reputation is built on our employees' actions and those who act on the Company's behalf. It does not matter where you work or what you do for the Company – you must use good judgement and follow our Code. This expectation applies to every employee at all levels of the Company, all the way up to the executive suite. The Code applies to everyone working at “controlled subsidiaries” and certain third parties (distributors and marketing reps). All of the above are referred to throughout this Code as “the Company.” All employees, and any others subject to the Code, must acknowledge that they have read and agree to uphold the Code.

Anyone who works on the Company's behalf (including suppliers, consultants and other business partners) must share our commitment to **Integrity**. Following the principles of our Code when providing goods and services to the Company or acting on our behalf is required.

Suppliers, as a condition of working with us, must comply with our Supplier Code of Conduct or the corresponding ethical standards of their own codes and policies.

OUR RESPONSIBILITIES



We are each responsible for holding ourselves to the highest ethical standards.

We do this by:

- Understanding and following our Code and the policies that support our Code
- Speaking up when we have concerns and asking questions
- Knowing how to report an ethics concern
- Cooperating honestly with an investigation

Everyone at Kraton is a leader when it comes to compliance. Being a leader comes with additional responsibilities. We show we are responsible by taking full **Ownership** for our actions. Examples of leadership behavior aligned with our Code and values include:

- Developing a **Teamwork** environment where questions are encouraged, different opinions are valued and everyone is included
- Being an **Integrity** champion
- Clarifying expectations
- Speaking up or correcting potentially unethical behavior
- Maintaining confidentiality
- Creating an environment of trust
- Prohibiting retaliation against those who report concerns

The consequences of violating the Code and related policies and procedures can be severe. Violators may face disciplinary measures, up to and including termination. Also, violations of the law could result in civil or criminal penalties for individuals involved and the Company.

WE SPEAK UP AND DO NOT ALLOW RETALIATION

If you suspect a violation of our Code, our policies or the law, you must report it promptly. Speaking up upholds Kraton's value of **Courage** and **Integrity**. It also helps to prevent or address illegal or unethical behavior.

Retaliation against anyone who reports misconduct or a potential violation in good faith is against Company policy. Anyone proven to have participated in retaliation is subject to discipline, up to and including termination (depending on local law requirements).

You make a positive difference when you report a violation or misconduct in good faith. If you suspect misconduct, or need advice, contact one or more of the following resources:

Reporting Internally

A supervisor or manager
Human Resources
Corporate Compliance
Legal
Internal Audit
Information Technology (IT)
Health, Safety, Environment and Security (HSES)
Chief Compliance Officer
Internal email: compliance@kraton.com

Reporting Externally/Online Reporting

Kraton's Ethics Helpline provides another available resource if you are uncomfortable using other alternatives. Managed by an independent company for all countries where we do business, our Ethics Helpline is available in multiple languages, 24 hours a day, 7 days a week and can be reached via phone (see Appendix A for details) or Internet at www.kraton.ethicspoint.com. Ethics Helpline calls are sent directly to Kraton's Compliance Department for consideration.

Regardless of how you report suspected misconduct or a Code violation, your concerns will be taken seriously. We will address them in a prompt, thorough and professional manner. If there is an immediate threat to a person, property or the environment, please follow your crisis management and emergency response procedures. Call local emergency services if needed.



LEARNING TOGETHER

Good Faith Reporting

A report of suspected misconduct, wrongdoing, abuse, criminal activity or any other violation of our Code or any legal requirements is made "in good faith" if it is done honestly, openly and fairly, without malice or the expectation of personal benefit from the outcome.

TOGETHER WE ALL MAKE A +DIFFERENCE FOR
OUR COMPANY
AND OUR STAKEHOLDERS



WE AVOID **CONFLICTS OF INTEREST**



We put Kraton's and our stakeholders' interests before our own personal gain by making decisions based on our ethics and ***Integrity***.

Why It Matters

We proactively address conflicts of interest. This helps to avoid the perception of misconduct. It also lets us ask ourselves whether we are placing our own personal interests before the needs of the Company.

HOW WE MAKE A **+DIFFERENCE**

We address actual or potential conflicts of interest by:

- Openly discussing conflicts of interest
- Immediately telling a supervisor about the actual or potential conflict
- Working on an appropriate plan
- Reporting any concerns through the reporting tools and options mentioned in this Code
- Ensuring that the Company's interest is the deciding factor in any decision we make.

THINKING IT THROUGH

Tips on how to spot a conflict of interest:

- Ask yourself:
 - Am I about to make a decision based on how I stand to benefit, whether for financial or personal gain?
 - Am I hiring a person because they are a friend or family member?
 - Should I recuse myself from the selection of a community service project because my friend is on the charity's board of directors?
 - Did I hire a consultant because my relative works for the same company?
 - Did I select this vendor for the sole purpose of putting Kraton in a better position to do business?

Reminder: A conflict of interest may exist if you, your spouse, a family member or someone else close to you has a personal or financial interest in the outcome.

LEARNING TOGETHER



Outside Business Ventures and Financial Interests

Avoid personal investments and outside business ventures that might compromise your ability to make objective decisions in Kraton's best interests or give the impression that you might not act objectively. This means you should not:

- Participate in businesses that compete with or are similar to Kraton
- Serve as an officer, partner or director of a company that does business with or competes with Kraton without prior written approval from Kraton's general counsel
- Participate in business ventures that interfere with your ability to perform your job duties
- Enter into personal transactions with your suppliers or customers under more favorable terms than are available to the public or Kraton employees

Outside Employment and Community Activities

Kraton employees are expected to dedicate their full- or part-time work obligations to Kraton. Avoid outside employment that would affect the ability to fulfill job duties for Kraton. This means employees should not participate in any outside business activity or hobby that would:

- Interfere with the time or attention that should be devoted to Kraton
- Adversely affect the quality of work performed for Kraton
- Compete with Kraton
- Imply Kraton sponsors or supports the outside activity or organization

Kraton encourages all employees to participate in community service activities. However, employees should not participate in any activity that would create a conflict of interest.

WORKING TOGETHER

Q: My mother just took a job at an engineering company that bids for work at the plant where I work. Although it's my boss who picks contractors, my opinion is valued. **Do I need to tell my manager about this new connection?**

A: The concern that your mother's new job might affect your objectivity would be reasonable. While you may not be the decision-maker, you are a decision influencer. Tell your supervisor so that you can work out a way to handle the situation. Transparency is vital to the procurement process.

WE PROTECT OUR **INFORMATION TECHNOLOGY SYSTEMS AND HARDWARE**

We protect our information technology (IT) systems and hardware because they are the building blocks for our future and help us better serve our customers.

Why It Matters

Our profitability and growth require us to use our systems and hardware wisely. They reflect the hard work of our employees. We want everyone who works with us to feel protected and confident in our ability to maintain and protect IT security.

HOW WE MAKE A **+DIFFERENCE**

We protect our IT systems and hardware by:

- Using our IT systems and hardware (such as computers, cell phones, and network systems) ethically, legally and in accordance with internal control procedures and policies
- Taking all reasonable steps to ensure that IT hardware and systems are not damaged, abused, wasted, lost or stolen
- Prohibiting the use of Kraton IT systems or hardware to create, store or send content that could be viewed as malicious, obscene, threatening or intimidating; or content that disparages our fellow employees, customers or suppliers; or content that might constitute harassment or bullying
- Remembering that electronic messages, both personal and business-related, "live" forever, and communicating thoughtfully
- Ensuring that only authorized users have access to our IT systems, and only to the extent needed to do their jobs
- Protecting user IDs and passwords, changing them regularly and never sharing them with others
- Always keeping IT systems and hardware safe and secure
- Only using software and third-party apps approved by Kraton's IT department for use on Kraton systems



LEARNING TOGETHER

We protect all Kraton IT systems and physical hardware provided to us to perform our jobs.

WE RECOGNIZE THE IMPORTANCE OF INTELLECTUAL PROPERTY (IP) AND RESPECT OTHERS' IP

We understand that Kraton's intellectual property is among our most valuable assets. We handle our intellectual property assets with the care they deserve. We protect and use intellectual property responsibly, whether it belongs to Kraton or others.

Why It Matters

Our intellectual property gives us a competitive advantage. We are also entrusted with the confidential information of third parties during our business activities. The protection of intellectual property, including confidential information, is each employee's responsibility.

HOW WE MAKE A +DIFFERENCE

We respect IP rights by:

- Refraining from unauthorized use, reproduction or distribution of the protected works of others
- Complying with all laws, regulations and contractual commitments regarding valid and enforceable IP rights of others, including copyright, trademarks, patents, trade secrets and other applicable laws
- Using IP, including software, databases, research materials and any other proprietary information, solely for authorized purposes and in accordance with applicable licenses and agreements
- Ensuring that our employees, contractors and other relevant parties are aware of their responsibilities regarding IP rights, and providing appropriate training and guidance to promote compliance
- Reporting to the appropriate authorities within Kraton any concern or suspicion that IP is being infringed upon, misused or misappropriated
- Encouraging employees to engage in innovative activities and contribute to the generation of new inventions
- Ensuring accuracy and **Integrity** in the development of new inventions and in the conduct of research
- Promptly reporting to IP Legal new inventions that may be strategic to Kraton's businesses
- Ensuring that IP rights resulting from the use of Kraton resources belong to Kraton, subject to applicable laws and prior arrangements with inventors and third parties

We ensure the safeguarding of confidential information by:

- Using caution when handling confidential information
- Sharing confidential information internally only with those who have a legitimate need to know
- Sharing confidential information with outside parties only if they are bound by a confidentiality agreement and have a need to know
- Treating confidential information that others have entrusted to Kraton with the same care and standards that we use to treat Kraton's own confidential information
- Establishing protocols and security measures such as using encryption, regular data backups, security measures and secured file storage, to protect confidential information from unauthorized access, theft or loss.

We continuously improve and stay compliant by:

- Regularly reviewing and updating our IP policies to ensure compliance with evolving laws, regulations and industry standards
- Promoting awareness and understanding of IP rights among our employees and stakeholders through training programs, communication and education initiatives

By following these Intellectual Property guidelines, we contribute to the protection and promotion of innovation, **Creativity** and intellectual property rights, and we foster an environment of **Integrity** and respect within Kraton and beyond.

LEARNING TOGETHER



What is “intellectual property (IP)”?

IP refers to the creations of the mind, such as trade secrets, inventions, trademarks, copyrights, software, databases, research materials, know-how and formulas.

What is “confidential information”?

“Confidential Information” means any non-public, proprietary or sensitive information, whether in tangible or intangible form, that is disclosed, generated or obtained during business operations. Examples include trade secrets, formulas,

processes, methodologies, employee records, financial information (including pricing) and projections, sales and marketing data (such as product and marketing plans), marketing strategies, customer and supplier lists, research and development projects, and ideas. Confidential information includes Kraton’s non-public, proprietary or sensitive information, as well as information of customers, suppliers and business partners that Kraton has agreed to protect from disclosure, unless legally required to disclose.

RESOURCES | [Intellectual Property Policy](#) | [Establishing IP Rights](#)

WE PROTECT OUR REPUTATION

We have carefully built a reputation of trust and Integrity. We protect and maintain our credibility through responsible actions and communications.

Why It Matters

Our actions and words can profoundly impact our organization. It is up to all of us to protect Kraton's reputation by maintaining clarity and consistency in our messaging. We achieve this by ensuring that only authorized individuals communicate on behalf of Kraton.

HOW WE MAKE A +DIFFERENCE

We protect our reputation by:

- Remembering that all electronic messages can be forwarded instantly and remain accessible forever
- Understanding that posting confidential, proprietary or personal information of coworkers, customers, vendors and suppliers is strictly prohibited
- Recognizing that only Kraton's Senior Management and Marketing Communications team are authorized to speak publicly on the Company's behalf
- Referring all questions, inquiries or requests from the press, media or financial analysts to individuals designated by Kraton



LEARNING TOGETHER

Social Media

Social media has revolutionized how companies do business and interact with the public. Blogs, microblogs and social platforms are parts of our global business presence. To ensure that only appropriate messaging is made public, no employees outside of our Marketing Communications team are authorized to post or review original Kraton content.

Press and External Parties

When we interact with the press and market analysts, it is important to communicate accurately, consistently and lawfully. Of particular concern are requests connected to Kraton's strategic plans, future earnings and future performance. To ensure appropriate messaging, Kraton designates certain individuals to communicate on the Company's behalf.

TOGETHER WE ALL MAKE A +DIFFERENCE FOR
**OUR COWORKERS AND
COMMUNITIES**



WE PROMOTE A SAFE AND SECURE WORKPLACE

We are committed to maintaining the highest standards of health, safety, environmental and security (HSES) protection.

Why It Matters

Kraton's greatest asset is our people, and **Safety** is our first priority. Kraton is committed to safeguarding people and the environment by improving the Company's environmental, health and safety performance, as well as the security of our facilities, processes and technologies.

HOW WE MAKE A +DIFFERENCE

We promote a safe and secure workplace by:

- Promptly correcting any safety-related condition or behavior
- Avoiding risk to our fellow employees, neighbors and the environment
- Knowing that we each have the responsibility and authority to stop work that we believe is unsafe
- Providing complete and accurate information in response to environmental, health, security and safety laws, regulations and permits
- Implementing emergency response plans, if necessary
- Complying with all applicable health and safety laws, rules and regulations, and all posted safety notices
- Never being impaired by alcohol or drugs while at work
- Never bringing firearms or weapons to Company facilities or when conducting Kraton business
- Taking advantage of our physical and mental health resources and understanding that impaired mental and/or physical health can affect safety



LEARNING TOGETHER

We strive to be as efficient as possible while working safely and protecting our environment. You are encouraged to submit any suggestions to your local HSES manager for improvements that would make our practices more innovative, safe and environmentally friendly.

WORKING TOGETHER

Q: I just saw a contractor cut his thumb when stripping the insulation off a piece of wire with his pocketknife. He is not a Kraton employee and was not using a Kraton-issued tool. Should I report it?

A: Yes. You must report all injuries and illnesses that occur while performing Kraton duties. It does not matter that it was a contractor or that he was using his own tool.

RESOURCES | [Health, Safety, Environmental and Security Policy](#)

WE EMBRACE INCLUSION, DIVERSITY AND NON-DISCRIMINATION

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 know they belong.



Why It Matters

Kraton's employees around the globe represent a talented and diverse workforce. Our commitment to equality and dedication to **Teamwork** is a cornerstone of our value proposition. By valuing unique perspectives, we create an environment where all people feel they belong. This is crucial to our success. We recognize and prevent harassment proactively, which further establishes a safe workplace. We foster a work environment where our differences are celebrated and all people are treated with dignity and respect. These efforts are not a finite goal but a journey that requires constant self-assessment and recommitment.

HOW WE MAKE A +DIFFERENCE

We embrace inclusion, diversity and non-discrimination by:

- Making employment-related decisions based on qualifications, merit and other job-relevant factors
- Creating and fostering a culture in which employees have an equal opportunity to develop their skills and talents
- Always treating one another with dignity and respect
- Avoiding behaviors that others may find offensive, degrading or threatening
- Encouraging coworkers to express opinions and ideas

LEARNING TOGETHER



Harassment-free Workplace

Creating an environment in which people feel they belong and can make a positive difference towards sustainable growth requires a commitment to human dignity, respect, and **Courage** to report harassment. All employees have a right to a workplace that is free from harassment. Harassment is not only offensive, but also against the law. Harassment is any action, conduct or behavior that diminishes dignity or creates an unwelcome, offensive,

humiliating, intimidating or hostile work environment. We do not tolerate harassment in the workplace. Sexual harassment is not tolerated at Kraton. Sexual harassment can be evidenced by conduct such as the use of unwanted sexually explicit words, pictures, gestures or advances, or requests for sexual favors. If you have a good faith belief that you have observed harassment or threatening behavior, report the situation immediately to a supervisor, the Ethics Helpline or the Legal Department.

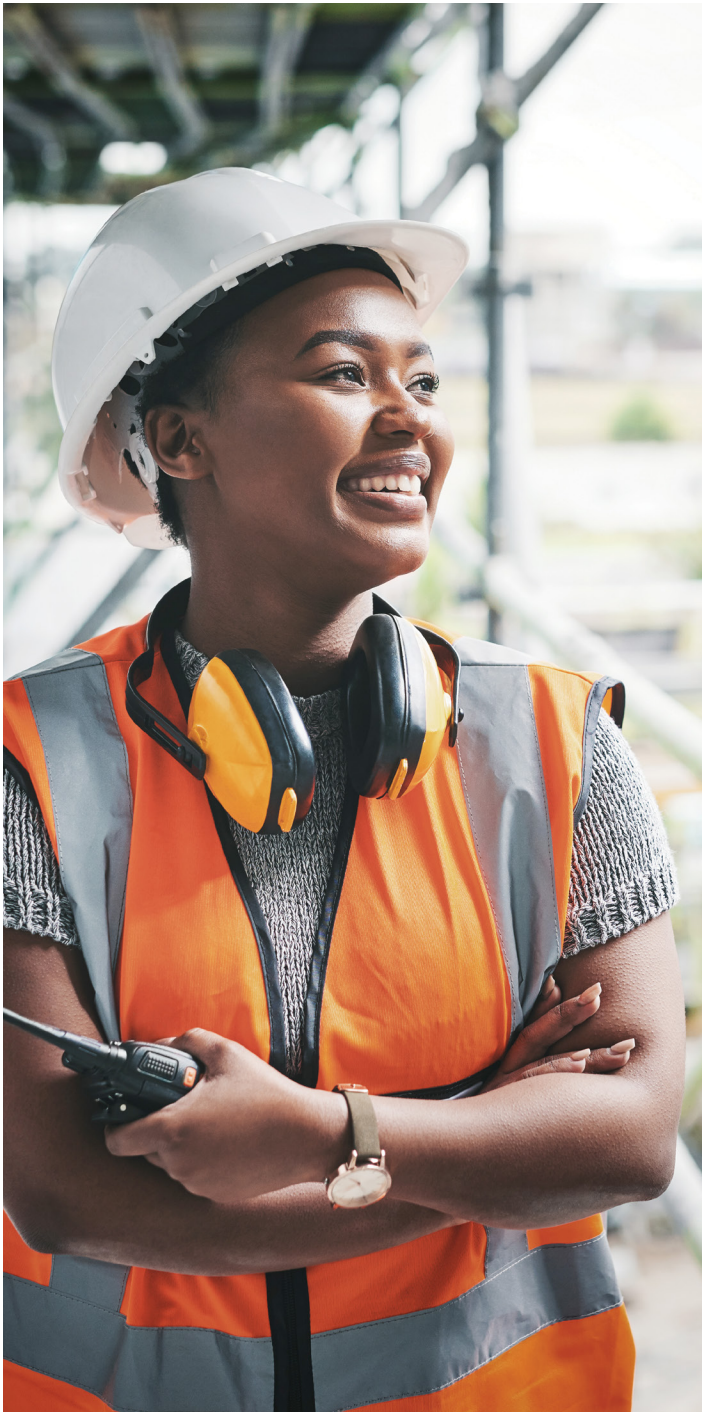
WORKING TOGETHER

Q: During our team meetings, my supervisor often makes jokes about my weight. My colleagues say it is harmless teasing. It makes me feel miserable, and I find it hard to do my job effectively. Should I report this?

A: You are not being treated with dignity, and this has created an intimidating work environment. You should report this to your local Human Resources representative, the Ethics Helpline or the Legal Department. Retaliation is against Company policy. After the situation is resolved, if you believe any retaliatory action has occurred, you should re-engage management.

WE PROMOTE **FAIR EMPLOYMENT** **AND HUMAN RIGHTS**

We protect the human rights and fair employment rights of individuals wherever we conduct business. We require our business partners to do the same.



Why It Matters

Kraton is a participant signatory enterprise to the United Nations Global Compact. We are committed to safeguarding human rights and conducting our business operations under the standards established by the Global Compact.

HOW WE MAKE A +DIFFERENCE

We promote fair employment and human rights by:

- Ensuring that we never engage in forced labor, human trafficking or child exploitation
- Complying with all applicable wage and hour laws, including those that address codetermination and works councils
- Ensuring each employee receives a fair wage, proper working conditions and fair working hours
- Respecting all employees' rights to form, join, self-organize, bargain or assist an association in representing their interests as employees
- Respecting an employee's choice to refrain from engaging in association activities
- Conducting due diligence on all suppliers and vendors
- Ensuring our suppliers are committed to fair labor practices
- Never looking the other way when we see or suspect human rights or labor law violations, and alerting the Ethics Helpline or Legal Department if we do

RESOURCES | [Supplier Code of Conduct](#) | [Sustainable Procurement Policy](#) | [Conflict Minerals Policy](#)
[Human Rights Policy](#) | [Slavery and Human Trafficking Statement](#)

WE PROTECT PRIVACY

We respect the privacy of our employees, customers, suppliers and other individuals with whom we interact.

Why It Matters

We recognize that data protection is essential to our trustworthiness. When there is a legitimate business interest in gathering Personally Identifiable Information (PII), we act ethically and follow all legal requirements, including local privacy and data protection laws. We want all our stakeholders to feel protected and confident in how we handle data and PII.

HOW WE MAKE A +DIFFERENCE

We protect privacy by:

- Practicing data minimization by gathering only the information needed for legitimate business purposes
- Limiting access to PII to those employees with a clear business need
- Taking the necessary steps to protect PII and sharing that information only on a need-to-know basis
- Utilizing passwords or encryption technology to protect PII
- Ensuring physical access controls are in place to prevent unauthorized individuals from viewing PII



LEARNING TOGETHER

What is Personally Identifiable Information?

"Personally Identifiable Information" refers to any information that can be used to identify, contact or locate the person to whom the data relates. Examples include

dates of birth, home addresses or telephone numbers, payroll information, performance evaluations and employment records.

WORKING TOGETHER

Q: My supervisor asked me to obtain a list of all Houston-based employees and their job titles from HR. However, the report that I received also included salaries and job grades. **What should I do?**

A: HR did not follow proper data minimization practices in providing this list, since you got more information than needed. You should immediately delete the file. Also, tell your manager and HR about the extra information you received. Request a modified list with just the names and job titles.

RESOURCES | [Global Data Protection Policy](#)

WE ENSURE SUSTAINABILITY

We thrive on **Creativity** and value our commitment to sustainability.



Why It Matters

We aim to be an admired sustainable supplier of innovation-based solutions to our customers. Our commitment is embedded across the organization. This allows us to grow our business, improve productivity and manage risks—while enabling our customers to do the same. Through a relentless focus on product quality and sustainability, we help meet market demands, advance the biobased economy and enable the circular economy to promote a more sustainable future.

HOW WE MAKE A +DIFFERENCE

We promote sustainability by:

- Collaborating with our value chain partners
- Fostering continuous improvements with our suppliers through our Sustainable Procurement Program
- Focusing on innovation and collaboration to ensure continuous improvement of the sustainability of our products, including our product portfolio consisting of many biobased certified products
- Assessing and rating our sustainability management systems annually

LEARNING TOGETHER

We strive to achieve the highest sustainability standards in our operations as a participant signatory enterprise of the United Nations Global Compact (UNGC) and its ten business sustainability principles. Additionally, Kraton is a member of Together for Sustainability (TfS), a joint initiative of chemical companies for sustainable supply chains. Using the EcoVadis platform, TfS implements a global program to assess, audit and improve supply chain sustainability practices. This forum allows us to engage with suppliers and industry peers to learn about their sustainability goals and practices and enhance our sustainability performance.

Kraton strives for transparency in our sustainability efforts. Annually, we publish our Communication on Progress. This details how we integrate the UNGC's principles into our business strategy, culture and daily operations, through our engagement with the American Chemistry Council (ACC), among other trade association resources. We also publish our Sustainability Report, which captures a variety of Environmental, Social and Governance data. We are a proud member of the ACC's Responsible Care® initiative, which includes implementing the Environmental Management System (EMS) certifications.

WE CAREFULLY PARTICIPATE IN THE **POLITICAL PROCESS**



We know that careful individual participation in the political process can make a difference in our communities.

Why It Matters

Kraton believes that each of us has the right to participate in our respective political systems. We can make personal political contributions within applicable legal limits. However, laws and regulations in many countries where we operate prohibit Kraton from supporting political candidates, and the Company does not typically participate in lobbying or similar activities.

HOW WE MAKE A +DIFFERENCE

We carefully participate in the political process by:

- Being clear that political views and actions are our own and not Kraton's
- Never pressuring or discouraging coworkers from participating in political activities, such as making a financial contribution to a political cause
- Conducting all individual political activities outside of work and at our own expense
- Never taking any action that would cause Kraton to violate these prohibitions
- Knowing that Kraton will never provide reimbursement for a political contribution

TOGETHER WE ALL MAKE A +DIFFERENCE TO
**OUR CUSTOMERS,
SUPPLIERS AND VENDORS**



WE ONLY GIVE OR RECEIVE ACCEPTABLE GIFTS AND ENTERTAINMENT

We look for opportunities to build business relationships and strengthen our **Agility**, but we never offer or accept inappropriate gifts and/or entertainment that could improperly influence business decisions.

Why It Matters

Providing or receiving gifts and entertainment can help develop strong working Relationships with our customers, vendors and other third-party stakeholders. However, we must never allow gifts or entertainment to influence our business decisions or create the appearance that our objectivity is compromised. We want our success to be based on the value of our products and services and the strength of our reputation.

LEARNING TOGETHER

What is a "gift"?

A "gift" can be defined in many ways. In this Code, a "gift" is defined as anything that has value to the recipient. This includes meals, travel, presents and tickets to various events.

If you have questions about the gift threshold allowable amount for your location, please contact your manager, Human Resources or the Legal Department.

HOW WE MAKE A +DIFFERENCE

We follow our gifts and entertainment policies by:

- Always using good judgment and moderation to guide us in giving or receiving gifts and entertainment
- Sharing gifts with coworkers where appropriate, as this demonstrates transparency
- Understanding that giving or receiving gifts and entertainment is inappropriate if it creates a sense of obligation or bias
- Only accepting tickets to an event if we have confirmation that the giver will be present
- Limiting the receipt and giving of gifts and entertainment to those hospitalities that are modest in value and consistent with Kraton's ethical standards, customary business practices, and applicable laws and regulations
- Clearly and concisely recording gifts with supporting documentation
- Never accepting or giving cash or cash equivalents, such as gift cards
- Only accepting paid travel accommodations from a third party or providing paid travel accommodations for a third party if you have received pre-approval from the Legal Department.
- Always obtaining pre-approval from the Legal Department before providing any gift or entertainment to a government official

WORKING TOGETHER

Q: I work in procurement. I received at my home two courtside seats for a National Basketball Association championship game from one of our suppliers.. We do not have any pending bids with them, but I feel strange accepting the tickets. **What should I do?**

A: These tickets are very expensive and could be described as lavish. The fact that they were delivered to your house could be viewed as an attempt to hide the gift from your coworkers. The fact that the vendor does not have any pending bids does not

solve these problems. Immediately notify your supervisor and the Legal Department. Let the vendor know that you cannot accept lavish gifts, and include a reference to this Code if necessary.

In certain situations, it could be awkward to refuse a gift. Should this occur, discuss the situation with your manager. Consider whether the gift should be donated to charity or provided to Kraton for further disposition. Regardless of how the situation is handled, the decision must be documented.

RESOURCES | [Anti-Bribery Policy](#) | [Travel and Entertainment Policy](#) | [Charitable Giving Policy](#)

THINKING IT **THROUGH**

The exchange of gifts, entertainment, meals and other forms of hospitality can help encourage **Teamwork** and build business relationships.

Click through the following questions you should consider before you offer or accept hospitality.

Is it for a proper business purpose?

Does it meet the policy definition of "acceptable?"

Can you confirm that it can not be perceived as intended to influence an impending business decision?

Have you followed all necessary approval and disclosure processes?

WE COMPETE FAIRLY

We compete on the value of our product offerings, **Agility**, innovation, customer service and solutions, and never through illegal or unethical means.

Why It Matters

We all benefit from free and fair competition. Regulatory authorities recognize the benefits of fair competition and have enacted fair competition laws and regulations designed to provide a fair marketplace for consumers and sellers alike. They have enacted fair competition laws and regulations to protect a fair marketplace. Violations of these laws and regulations could result in severe criminal and financial penalties both for Kraton and for individual Kraton employees. Defending an allegation of violation of fair competition laws can result in a significant drain on company resources.



HOW WE MAKE A +DIFFERENCE

We promote ethical competition by:

- Competing vigorously but never compromising our **Integrity**
- Following all laws, rules and regulations related to fair competition laws and our policies
- **Never engaging in any of the following activities:**
 - Selling our products at below-cost pricing with the intent of driving competitors out of the market
 - Conditioning the purchase of certain Kraton products on the required purchase of additional Kraton products
 - Selling Kraton's products to any customer or potential customer as a condition that Kraton buy the customer's products, and vice versa as this relates to any potential procurement activities
- **Following this guidance when gathering information about competitors:**
 - Never exchange non-public, confidential and/or sensitive information with competitors unless approved by the Legal Department and under appropriate confidentiality protection
 - Gather market intelligence from publicly available sources (such as securities filings or industry publications, with documentation), or third-party consultants and trade associations, or from third parties that we can confirm are not obligated to protect the confidentiality of that information
 - Never use Kraton employees or third parties to obtain non-public information about competitors
 - Contact the Legal Department immediately if we unintentionally receive or send a communication that contains confidential or proprietary information from or about a competitor
 - Carefully draft all written communication about competitors to avoid any misstatements, inferences or conclusions that may be misinterpreted or taken out of context
 - Consider that customers in one area of our business may be competitors in another

WE COMPETE FAIRLY



INTERACTIONS WITH COMPETITORS

Regulators view interactions between competitors as an opportunity to discuss and agree to improper or illegal activity. Whether the interaction occurs at a trade show, an industry seminar or even an unplanned encounter at a coffee shop, regulators are on the lookout for illegal agreements between competitors. It does not matter if this agreement is in writing or is merely an informal understanding between two or more competitors. Whenever you interact with a competitor, regardless of whether it's planned or unplanned, you must do so with the highest **Integrity**.

Any planned meeting with a Kraton competitor must be pre-approved by the Legal Department through our online system designed for that purpose. Attendees must submit for pre-approval an agenda, description of the meeting purpose and a list of attendees and their roles, for review and pre-approval by the Legal Department. The Legal Department may provide you with specific guidelines for your meeting. Regardless of whether a meeting with competitors is planned and pre-approved, or unplanned, you should never discuss any of the following topics with a competitor:

- Dividing territories, customers or products
- Customer pricing
- Supplier pricing
- Supply chain problems
- Coordination of terms and conditions of sale or purchase
- Any agreement to refrain from doing business with a customer, supplier or vendor
- Strategic planning or production, capacity or input costs
- Coordination of terms or conditions for wages, benefits or fees in relation to employees, independent contractors or vendors, unless permitted under applicable laws and regulations

After a meeting with a competitor, submit a summary report to the Legal Department using our online system.

WORKING TOGETHER

Q: On my customer prospect list is a company that might be interested in one of our products. The company competes with one of our business units. **Can I sell products to our competitors?**

A: It is permissible to sell products to, and purchase products from, competitors, if that is consistent with our business goals. You should always consult a member of the Legal Department for specific guidance regarding agendas and other meeting guidelines, and all interactions should be consistent with our Interactions with Competitors Policy.

TOGETHER WE ALL MAKE A +DIFFERENCE **IN OUR MARKETPLACE**



WE PREVENT CORRUPTION AND BRIBERY

Our view on corruption and bribery is simple: “We do not tolerate bribery in any form—whether by our employees or third parties working on our behalf to gain a business advantage, or by third parties attempting to gain a business advantage from Kraton.

Why It Matters

We recognize that corruption is not only against the law, but it also harms the local communities affected by it. We live our values by preventing bribery and corruption, even if doing so costs us a business opportunity. No amount of profit is worth sacrificing our values. Governments impose hefty fines and jail time for violations of anti-bribery laws. We are committed to ethical business practices and will not tolerate improper actions from our employees or contractors.

HOW WE MAKE A +DIFFERENCE

We prevent bribery and corruption by:

- Never offering, promising or giving anything of value to anyone, including government officials, to gain an improper business or personal advantage
- Never offering or accepting bribes or kickbacks
- Understanding that calling a bribe or kickback a “local custom” does not make it acceptable
- Never making a facilitating payment to an individual to expedite a government activity. Paying an official expediting fee listed on a government website, where payment goes directly to the government, is usually acceptable and not characterized as a facilitating payment.
- Never using an agent or other third party to make payments that we may not make ourselves
- Keeping accurate and complete records of all financial transactions
- Fully vetting all third parties that we use to act on our behalf, or with whom we entrust our goodwill
- Following all Kraton policies regarding anti-bribery and corruption, and addressing questions to the Legal Department



WORKING WITH THIRD PARTIES

Kraton uses third parties to perform different services on our behalf. Lawyers, accountants, distributors, marketing representatives, project managers, customs brokers and safety consultants are examples of professionals who interact with government officials, customers or suppliers on our behalf. These third parties “represent” Kraton and are entrusted with our goodwill in all their external interactions. While it is acceptable to engage such companies, be aware that Kraton will be held responsible for any improper actions of these representatives when they act on our behalf. We cannot ignore the warning signs of questionable conduct. We cannot ask third parties to do something improper on Kraton's behalf that we could not do ourselves.

Before Kraton engages any third-party representative, evaluate the following:

- Do we need non-employees to perform this activity?
- Is the third party well-qualified to perform the services?
- Can we verify that the third party has a track record of ethical behavior?
- Have we conducted due diligence on the third party?
- Do we understand how the third party will perform its services?
- Is there an appropriate contract in place?

LEARNING **TOGETHER**



WORKING **TOGETHER**

Q: We are bidding for a contract to supply additives for a road paving project. All additives must be approved by a government agency. An agency scientist emailed me from her personal email address. She said that she could help us get approval if we paid her a consulting fee in cash. **What should I do?**

A: Do not pay the fee; immediately contact the Legal Department. Making or offering to make such a payment could be a violation of the applicable anti-corruption laws, including the United States Foreign Corrupt Practices Act. The size or origin of a bribe is not relevant. Commercial bribery is unlawful regardless of amount, and regardless of whether it comes through a third party acting on Kraton's behalf.

RESOURCES | [Global Anti-Bribery Policy](#) | [Third Party Intermediary Onboarding and Retention Policy](#)

WE UNDERSTAND INTERNATIONAL TRADE COMPLIANCE

We comply with all applicable laws and regulations that govern international trade, including imports, exports and sanctions.

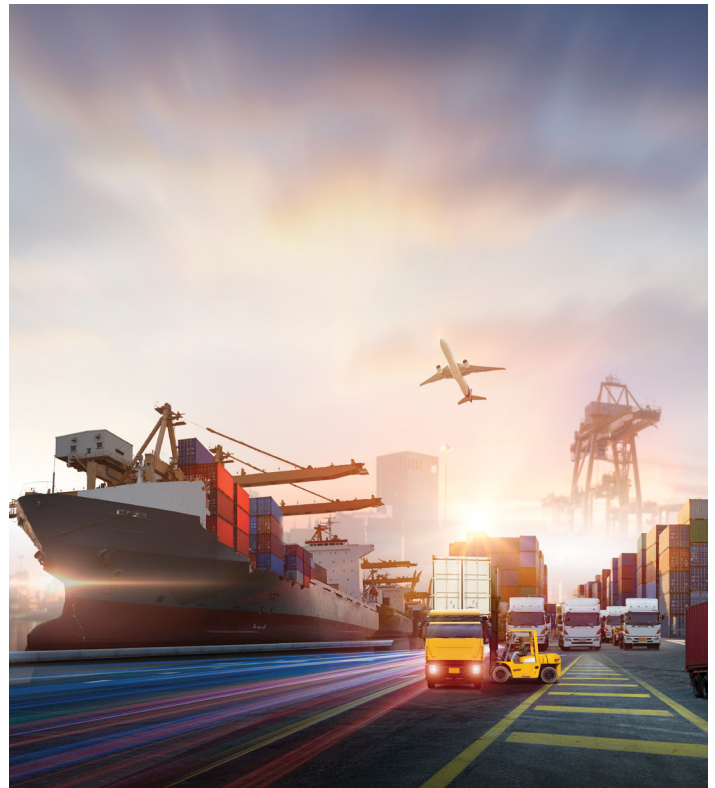
Why It Matters

We operate on a global basis and must follow all applicable laws and rules. These laws, rules and regulations may vary depending on the location, and they can affect how we conduct business. National security, political or economic considerations may cause governments to impose trade restrictions on certain nations, goods, organizations or individuals. Countries sometimes impose economic sanctions or act together to further their foreign policy objectives, as evidenced by trade embargoes, boycotts, travel bans and freezing of assets. We are obligated to follow these regulations, which protect Kraton and help to make the world safer.

HOW WE MAKE A +DIFFERENCE

We comply with international trade laws by:

- Understanding the regulatory requirements applicable to the marketing or distribution of products across international borders.
- Ensuring that our marketing and sales activities are conducted in full compliance with any applicable trade embargoes or sanctions that restrict trade with individuals, businesses or countries, including those of the US and the European Union
- Ensuring that our marketing and sales activities are conducted in full compliance with any applicable export control laws and regulations that apply to the export or reexport of goods and technology, including those of the US and the European Union
- Engaging the Legal Department if we have any questions regarding a potential commercial transaction
- Alerting the Legal Department if any customers, suppliers or others ask us to participate in a boycott



LEARNING TOGETHER

What is an "import"?

An "import" is the act of bringing a product, service, technology or piece of information into a country from a foreign country.

What is an "export"?

An "export" is the act of sending a product, service, technology or piece of information from one country to another country. In some cases, the disclosure of technology to a foreign national may be considered to be an "export" even if the disclosure is not made across international borders.

Embargoes, sanctions, tariffs, duties and licenses are examples of import/export laws and regulations.

WE PREVENT **INSIDER TRADING**



We deliver on our commitment to act with Integrity by not using or sharing material, non-public information when buying or selling securities.

Why It Matters

We preserve our reputation by protecting information entrusted to us and never using that information for personal gain. We may have access to information about our customers, suppliers and other business partners that is not yet known to the public. If those customers, suppliers and/or business partners are publicly traded, and the information is material such that it could affect the value of the publicly traded shares, it is referred to as "inside information," and trading on that inside information is referred to as "insider trading." We do not use inside information for our own benefit, or engage in insider trading, because it is unethical and illegal, and it would harm our shareholders, our employees and our reputation.

HOW WE MAKE A **+DIFFERENCE**

We prevent insider trading by:

- Never buying or selling shares of a publicly traded company when in possession of inside information
- Never buying or selling shares of a publicly traded company until the inside information becomes available publicly and investors have had a chance to evaluate it
- Not disclosing inside information to anyone outside of Kraton, including family members, relatives or friends
- Only sharing inside information with fellow employees on a need-to-know basis
- Protecting inside information from accidental disclosure
- Never maintaining unrecorded or "off-the-books" funds, liabilities or assets
- Contacting the Legal Department with any questions on whether information is considered "inside information"

LEARNING TOGETHER



What is "insider trading"?

"Insider trading" is the purchase or sale of a publicly traded security while in possession of material, non-public information about the issuer of that security.

What is "material information"?

Whether information is "material" depends on the facts and circumstances of each case. Examples of "material information" include:

- Earnings information
- Significant financial gains or losses of the business

- The hiring, firing or resignation of a director or officer of a company
- An impending significant regulatory action
- A verdict in an impending significant lawsuit
- Negotiations or impending transactions regarding substantial acquisitions or divestitures of a company's assets or the formation of a strategic venture

What is "tipping"?

"Tipping" is the communication of material, non-public information to another person who might use it to trade in securities. Tipping is illegal.

WORKING TOGETHER

Q: Recently I attended a meeting with a publicly traded company to discuss a new product that we hope will improve our sales significantly. While no one said to keep this information confidential, I do know that only a few people within that company have been involved in the project. I am about to sell a house and want to use some of the profit to purchase some of the publicly traded company's stock.

A: You may now have "material information" about that publicly traded company, especially if this new product will significantly increase sales in the near term. The information is also "non-public," as only people inside that company know about it. Trading on their stock under these conditions would be illegal insider trading if the information is determined to be material.

WE KEEP ACCURATE BOOKS AND RECORDS

We work together to ensure that all records and accounts are accurate, truthful and retained for the appropriate time.

Why It Matters

Maintaining accurate records enables us to make responsible and practical business decisions. Our controls enable us to deal honestly and fairly with suppliers, customers and employees. While it may not seem as though the information each of us generates (including personal time records, expense reports, invoices, financial entries, benefit claims and safety records) is important, all such information is subject to these controls and standards.

HOW WE MAKE A +DIFFERENCE

We keep accurate records by:

- Ensuring every record we generate is accurate and complete
- Complying with our system of internal controls and record-keeping requirements
- Recording authorized transactions with the proper management approval
- Recording all assets, liabilities, revenues and business transaction costs completely and promptly
- Never delaying or accelerating the recording of revenues, expenses and cash receipts or payments to meet budgetary or targeted goals
- Completing the quarterly internal control and finance certifications in the timely fashion required by our role
- Sharing any concerns or questions about any accounting or auditing matter with the chief financial officer or Internal Audit
- Following the Records Retention Schedule and Records Management Policy, which establish the length of record retention and the timing and manner in which items should be stored or destroyed
- Being familiar with our department's activities for record retention procedures

LEARNING TOGETHER

What is a legal "hold"?

From time to time, lawsuits or claims are filed or governmental regulators or investigators may inspect Kraton's facilities. We cooperate with these requests and inspections and notify the Legal Department when they occur. We also promptly preserve

or "hold" any record for any anticipated or pending litigation, investigation or audit. The Legal Department will manage the hold process; establishing a hold will help to ensure that no document or record is destroyed, concealed or altered.

WORKING TOGETHER

Q: I was asked to clean out the office of a 30-year Kraton employee who recently retired. A lot of the information is outdated. **Can I just throw it away?**

A: You should read the Records Management Policy and Records Retention Schedule before deleting or destroying any information. If you have any questions, contact the Legal Department for additional guidance.

RESOURCES | [Records Management Policy](#) | [Records Retention Schedule](#)

RESOURCES AND CONCLUSION

Our Code helps us navigate daily situations and ensure that we fulfill our vision and live our values. The Code reflects Kraton's core values and culture, thereby instilling confidence in our people, customers and communities. It reinforces that Together We All Make a +Difference.

To ask questions or report a concern, contact:

- A supervisor or manager
- Human Resources
- Corporate Compliance
- Legal
- Internal Audit
- IT
- HSES
- Chief compliance officer
- Internal email: compliance@kraton.com
- Ethics Helpline: www.kraton.ethicspoint.com



LEARNING TOGETHER

Training

Kraton offers online and live training to employees every year on various risks that could affect the Company's reputation.

Conflicts Between the Code and Applicable Law

If there is a direct conflict between a specific requirement of applicable local laws and regulations and the Code, then local laws and regulations take precedence.

Amending the Code

Kraton issues this Code under the authority of the Audit and Compliance Committee of its board of directors, which has reviewed and adopted it. The Audit and Compliance Committee must approve any amendment to the Code. Each Kraton employing entity has adopted the Code as its policy and will be primarily responsible for enforcing compliance.

Waivers of the Code

Kraton applies the standards of our Code equally to all employees, officers and directors. We grant waivers in limited circumstances. Only our Board of Directors (or a designated committee of our Board) may waive portions of our Code. Such waivers will be promptly disclosed to the extent required by law. Only the general counsel may grant waivers below this level.

To review company policies referred to in the Code, go to www.kraton.com



Our Code of Conduct and Business Ethics

© 2024 Kraton. All rights reserved.

TOGETHER WE MAKE A +DIFFERENCE