



The Diversey
Employee Code of Conduct



Diversey’s purpose is to protect and care for people through leading hygiene, infection prevention and cleaning solutions. Diversey (the “Company”) has been, and always will be, a pioneer and facilitator for life. We constantly seek to deliver revolutionary cleaning and hygiene technologies that provide total confidence to customers across all our global sectors.

Everything we do is based on the implicit belief that cleaning and hygiene are life essentials and that what we undertake constitutes a vital service. Harnessing over 95 years of expertise and knowledge, Diversey develops cleaning technologies that save lives while providing a tailored, customer centric approach that empowers sustainable solutions.

Protecting and improving the environment, we operate with our customers’ needs at the heart of everything we do. Diversey’s ethical commitment is implicit in all our products and everyday relationships with our employees, our customers, and our planet. These ethics drive our commitment as pioneers of the future and creators of connection and innovation.

Diversey is our Company. Each of us, as individuals and as teams, have a role to play in making the Company successful. To this end, each employee should remain determined to bring their expertise, ideas, and passion to every act on the Company’s behalf.





Purpose of the Code of Conduct

As a service-oriented company, Diversey is focused on attaining and maintaining exemplary people practices supported by high ethical values and integrity-based practices. This focus will further the Company's goals to create a safe and great workplace for all employees and to address our customers' needs with uncompromised service and honor. To this end, all employees are required to read, understand, abide by and comply with our Code of Conduct (the "Code"), as well as all Company policies and procedures. These sources of authority apply to all employees, officers and directors.

Compliance with All Applicable Authorities

The Company is subject to federal, national, state, provincial, county, local, and international laws and regulations. We all must comply with all applicable sources of law and uphold our Code. Any Diversey employee aware of unlawful activities in the Company should contact the Legal Department. If a provision of our Code conflicts with applicable law, the law controls.

Adherence to High Ethical Standards

Each of us must adhere to high ethical standards of conduct in all of our business activities and must act in a manner that enhances the Company's reputation in the business community and with the public. Integrity is the basis of all our business relationships.

Responsibilities: Duty to Speak Up/No Retaliation/ Confidentiality

You are required to report promptly, and in good faith, any conduct of any employee or third-party agent (e.g., a supplier or contractor) that could constitute a violation of the Code. If you deliberately fail to report a potential violation, deliberately submit a false report, or withhold relevant and material information concerning a violation, you may be subject to disciplinary action, up to and including termination of employment. If you have questions regarding a potential or suspected violation of this Code, discuss it with your supervisor,

Human Resources or the Legal Department. You also may make a good-faith report of suspected violations or seek guidance by accessing the Company's Ethics Hotline.

The Company is committed to protecting responsible employees who report suspected violations in good faith. The Company will take steps to protect each employee from reprisals or retaliation so that all are comfortable reporting violations and protecting the Company. If you believe you are the victim of retaliatory action, you should contact your supervisor, Human Resources, the Legal Department or the Ethics Hotline, as appropriate.

The Company will promptly respond and strive to ensure that your concern is handled with sensitivity, confidentiality and to the fullest extent possible. In return, we expect you to help protect the confidentiality of the report, as well as any subsequent investigation processes, by not discussing the matter with co-workers, members of the public, or media as such actions may frustrate the integrity of any information gathering and/or reporting activities.

Appropriate Discipline Actions for Failure to Comply with Code

Any failure to comply with the standards contained in the Code may result in disciplinary action, up to and including termination of employment, and sometimes also personal civil or criminal liability.

All managers, senior leaders, and executives should set an example for their colleagues when performing their duties or otherwise acting on behalf of the Company.



Acting transparently and in compliance with this Code, while in a leadership role, makes it clear that the guiding principles and rules described in this Code are to be adhered to without exception

SAFETY IN THE WORKPLACE

We prioritize safety and health at work

Wherever we are, and whatever our role, the safety and well-being of our employees must always come first. We are committed to providing a safe and healthy place of work for all our employees whether at home or at an office or factory or warehouse. As part of this commitment, all facilities must comply with workplace safety laws and ensure proper working conditions. When working from home employees are expected to perform their duties in a safe manner at all times. Machinery should only be operated by trained personnel, according to instructions. Everyone should take appropriate action when a safety hazard arises and report any imminent danger. At all our sites and factories we must ensure that prescribed emergency and fire safety rules and procedures are adhered to, and that hazardous materials are safely managed and proper housekeeping is observed.

For additional details on employee health and safety please refer to the Sustainability, Environmental Health and Safety Policy.

We describe all our products, packaging, machines, equipment and services as safe and high-quality

Our primary goal is to provide high quality and safe products, packaging, machines, equipment and services. We strive to consistently deliver products, packaging, machines, equipment and services that meet our customers' expectations and our own high standards. To this end, we seek continuous improvement and innovation in our operations to meet those standards. Products, packaging, machines, and equipment must comply with all applicable regulations where they are manufactured, sold, or distributed. Products, packaging, machines, equipment must be supported by safety information including,

but not limited to, appropriate directions for use, hazard classifications, warnings, first aid instructions, and emergency contact information. Accurate and complete Safety Data Sheets and labels must be legible and available to distributors, customers, and end users. Diversey also commits to responsible material use, outlined by the Responsible Chemistry Policy. We are committed to product safety, from concept and manufacture through customer use and disposal, recycle or reuse.

By complying with the laws, regulations and Company policies that govern the development, manufacturing, testing, inspection, storage, transportation, use and disposal of our products, packaging, machines and equipment, we help ensure the integrity of the Diversey brand. No employee should take any action that could jeopardize our customers' confidence or trust in the quality and safety of our products, packaging, machines, equipment and services.





Company Expectations and Values

- Follow the safety guidelines in place at each of our locations. If you work from home you must play your part and are accountable for contributing to the maintenance of an environment free of safety risks or health hazards wherever you are. When an unexpected danger emerges, act quickly and safely to alert colleagues and report imminent danger so that it can safely and quickly be addressed.
- If you observe an unsafe situation or incident, along with being addressed immediately, it should be reported to a manager, local Health and Safety employees, or via the Safety icon within the Workday tool on the Intranet. If you observe an unsafe situation or incident, along with being addressed immediately, it should be reported to a manager, local Health and Safety employees, or via the Safety icon within the Workday tool on the Intranet.

TREATMENT OF WORKERS, STAKEHOLDERS, AND OTHERS

We do not tolerate discrimination, harassment or bullying

The Company is an equal opportunity employer that values diversity and inclusion in our global organization. At all times, we strive to comply with all laws prohibiting discrimination in hiring and employment practices on the basis of race, religion/belief, national origin, ethnicity, gender (including pregnancy), sexual orientation, marital status, gender identity or expression, age, disability, or other protected statuses.

We believe diversity in our workforce is an asset that enhances our creativity, innovation, and growth. Our employees encompass various cultures, sexual orientations, gender identities, ages, backgrounds and experiences. This variance is a strength that allows us to explore issues from many perspectives. We believe diversity of ideas and perspectives enriches our decision-making process and our ultimate ability to provide continuous value to the marketplace.

To accomplish our goals in this area, it is imperative that we create an environment of equal opportunity where instances of discrimination, harassment, bullying based on a protected status are identified early and addressed effectively. Therefore, any instance of

discrimination, harassment, and/or bullying based on another's race, religion/belief, national origin, ethnicity, gender (including pregnancy), sexual orientation, marital status, gender identity or expression, age, disability, or other protected statuses (as defined by local Company policies or law) should be reported immediately to Human Resources (or as described in applicable local Company policies). The Company's intolerance of the above actions applies to anyone, including supervisors, co-workers, employees or non-employees, vendors, clients, or customers of the Company. Employees should refer to their local Company policies for more information on defining, reporting, and enforcing Company mandates related to discrimination, harassment and/or bullying in the workplace. The following examples, however, provide some guidance to prohibited workplace behaviors when based on another's protected status:

- **Harassing conduct is defined as verbal or physical behavior that disparages or shows hostility towards another person or group (e.g., using offensive jokes or insults, displaying offensive pictures and symbols, creating a hostile or intimidating environment, requiring romantic or physically intimate conduct for professional gain)**
- **Discriminatory conduct is defined as treating another person or group unfairly or prejudicially (e.g., using a harsher standard to appraise the work of individuals within a particular protected status group; failing to hire or terminating the employment of an individual because of their membership in a protected status group).**



Bullying conduct is defined as the use of repeated aggressive, coercive, or threatening behavior to dominate, intimidate, or force one's will (e.g., insulting or belittling a coworker or subordinates in group meetings to create embarrassment). Prohibited bullying conduct may or may not be based on an individual's protected status.

Again, any suspected instances of prohibited discrimination, harassment, and/or bullying should be reported to Human Resources or as described in the applicable local Company policy. Employees may also utilize the Company's Ethics Hotline to make such reports, which provides for anonymous reporting.

We are fully committed against the use of child labor, forced labor, modern slavery, and human trafficking

The Company stands with full commitment against the use of child labor, forced labor, modern slave labor and human trafficked workers within its business, its supply chain, or other known areas. To this end, the Company will only employ workers who meet applicable local minimum-age requirements and who are legally entitled and willing to work. Accordingly, we require all business partners to demonstrate a similar commitment to the basic human rights of workers worldwide. For additional information refer to the Diversey Supplier Code of Conduct and the Modern Slavery Statement.

Any known or suspected uses of child labor, forced labor, modern slavery, or human trafficked workers should be reported to the Legal Department. Employees may also utilize the Company's Ethics Hotline to make such reports, which provides for anonymous reporting.



Company Expectations and Values

- **Afford equal employment opportunities to employees and applicants without consideration of their protected status.**
- **Treat others with dignity, professionally and respectfully.**
- **Demonstrate respect for the diverse characteristics and viewpoints of your fellow employees.**
- **Speak up, report known or suspected instances of discrimination, harassment, and/or bullying.**



DATA PRIVACY

We handle Company intellectual property, confidential information and personal data privately and securely

The Company's confidential information and intellectual property are important and valuable assets that should be kept private at all times unless disclosed pursuant to applicable laws and employment agreements. These assets include but are not limited to information in whatever form related to Company equipment, facilities, inventories, know-how, trade secrets, inventions, technology, product formulas, pricing, customers, industry and market analyses, business strategy, and employees' and third-party personal data.

Employees must protect and preserve intellectual property and confidential information entrusted to them by the Company, its employees, its customers and other stakeholders, and its suppliers. Those who use or have access to such information are responsible for keeping it safe and secure and using it only for legitimate and appropriate Company business reasons consistent with applicable laws and policies.

Company Expectations and Values

- Only access, use, store, transfer or modify confidential information as needed to do your job.
- Never share confidential information with someone who does not have a business need to know it and is not authorized to have it.
- Take steps to prevent accidental disclosure by keeping your devices password protected, and safely securing any sensitive files held in a locked drawer or in a digital format.
- Protect all personal data ensuring that it is only used for the purpose for which it was collected and only fairly, proportionately and legally. It should be kept securely and protected from unauthorized access.
- You should not share personal data with third parties unless you have authorization to do so and all personal data should be deleted once the purpose for which it was collected is complete.
- For further information about Data Privacy refer to the Global Data Privacy Policy.

ETHICAL BUSINESS PRACTICES

We market our products and services and communicate responsibly

The Company's public communications reflect our commitment to integrity and transparency. Therefore, we strive for accuracy and transparency with our customers when we market, advertise, and/or label our products and services. Furthermore, to maintain accuracy and consistency in our public communications, only designated Company spokespersons should make public statements about our Company.



Company Expectations and Values

- Follow all marketing and advertising laws.
- Ensure our claims are substantiated and our methods are both ethical and legal.
- Market our products in a truthful, accurate way – never through deception or exaggeration.
- When using social media, do not discuss any confidential Company information and avoid expressing opinions that could be attributed to the Company; only authorized spokespersons should use social media to make statements on the Company's behalf.
- Refer media requests for product or service information or comments to the Marketing team.

We protect Company investments by shareholders and other stakeholders

We maintain the integrity, accuracy and reliability of our financial books, records and controls. We rely on our financial books and business records to make smart and timely business decisions. Additionally, all employees generate records as part of their regular tasks, like filling expense reports, drafting contracts and proposals, or sending emails. It is crucial that these documents accurately reflect the situation, and that no relevant information is excluded.

Company Expectations and Values

- Provide accurate, timely and complete information to directors, officers, consultants, and employees, involved in the preparation of Company's required disclosures.
- Record all financial information and business transactions completely, accurately and in a timely manner.
- Comply with the Company's disclosure controls and procedures.
- Be professional, thoughtful and accurate when creating records, including email or instant messages.
- Maintain and destroy records according to record retention policies and laws, legal holds, and other data governance processes.
- Do not conceal or destroy records related to an investigation, litigation, or potential claims.
- Contact the Legal department with any questions related to document retention.



We do not use or disclose inside information for personal gain

Employees have access to Company information before it reaches the public. By protecting this “inside information” by not misusing it, we act in the Company’s and our investors’ best interests. The Company’s Insider Trading Policy is the governing policy for all directors, officers and employees on the issue of insider trading.

Inside information is information that is both material and nonpublic in nature. Material information is information that could affect a person’s decision whether to buy, sell or hold securities. This sort of information is considered non-public until it has been made public (for example, through public filing with a securities regulatory authority; issuance of a press release; or disclosure of the information in a national or broadly disseminated news service).

Regardless of how we come across inside information, we cannot use it for personal gain, nor disclose it to others unless authorized by the Company. Employees who use inside information for personal gain may violate insider trading laws, which can lead to imprisonment, fines and damage to the Company’s reputation.

This rule also applies to inside information relating to other companies, including our vendors and suppliers when that information is obtained in the course of employment with, or in the performance of service on behalf of the Company.

Company Expectations and Values

- Provide accurate, timely and complete information to directors, officers, consultants, and employees, involved in the preparation of Company’s required disclosures.
- Record all financial information and business transactions completely, accurately and in a timely manner.
- Comply with the Company’s disclosure controls and procedures.
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We protect and ensure proper use of the Company's assets

All employees are responsible for the proper use of Company assets. The Company has three types of assets:

- 1) Physical assets, such as materials, supplies, software, inventory, equipment, computers, internet access and technologies;
- 2) Information assets, such as confidential and proprietary business information and intellectual property (including our valuable brands); and
- 3) Resource assets, such as capital and company time during the work day.

Employees must take all reasonable steps to protect Company assets from theft, destruction, or other loss and to ensure that assets are not wasted, misused, or diverted.

Company Expectations and Values

- Protect all Company assets in your care from loss, theft, damage, waste, or misuse.
- Use Company assets for their intended business purposes. While some personal use may be allowed under Company policies, such use must always be legal, ethical, and reasonable and should not interfere with your job.
- Take precautions to avoid losing, misplacing, or leaving confidential information (or laptops, smartphones, or other items containing this information) unattended.
- Avoid discussing confidential information or any other sensitive topics in public areas (think planes, elevators, and restaurants) where others might overhear you.
- Do not use Company technologies to download, view, or send materials that are obscene, offensive, discriminatory, harassing or otherwise unlawful or unethical.

We do not act to create or to appear to create conflicts with the Company's best interests

We must avoid any circumstances that create, or appear to create, an improper personal benefit through the use of Company property, information, or position. Our business decisions must always be based on an objective assessment of what is best for the Company. Even the appearance of a conflict of interest could result in serious consequences, and can undermine the trust that employees, business partners and the public place in the Company. The term "conflict of interest" means any circumstance that could cast doubt upon an employee, officer, or director's ability to act with complete objectivity and loyalty regarding the Company's interests. Employees should avoid situations in which there is, or appears to be, a conflict between the personal interests of the employee and the interests of the Company. Employees must disclose any actual or potential conflict as early as possible, so that any conflict of interest may be addressed and resolved in an appropriate manner. Additionally, if you have a question about or suspect a situation may create an actual or potential conflict of interest, please contact the Legal Department, or you may make an anonymous report with the Ethics Hotline.



Company Expectations and Values

- Employees should not engage in any activity that conflicts with, or appears to conflict with, the Company's business interests, such as simultaneously working for a competitor company.
- If a family member or close friend owns or works for a company seeking to do business with the Company, tell your manager about the relationship. Similarly, remove yourself from the hiring process when your family member interviews for a position at the Company.
- Report to your Human Resources representative immediately if you learn a family member will be in your supervisory or reporting chain.
- Employees should avoid having significant financial interest in any company or entity that is (or seeks to be) a business partner, supplier or customer, or competitor without first seeking approval from the Legal department, including the amount of ownership that is "significant."

We exercise proper care around gifts and entertainment

Exchanging gifts, entertainment and other forms of hospitality is a common way to build business relationships. However, misuse of gifts and entertainment can lead to actual or apparent conflicts of interest and increase the risk of serious bribery and corruption issues. To prevent these problems and protect our integrity, we maintain appropriate restrictions on the giving and receiving of gifts and entertainment.

It is prohibited to accept or receive high-value gifts from any business partner. However, reasonable non-cash items that are insignificant, small, incidental, and have a token or nominal value are reasonably permitted, provided that they are not intended and cannot be construed as a bribe, kickback or other form of compensation to the recipient. In addition, employees should not solicit gifts or services for themselves or others, including family members or friends, from business partners, customers, or other stakeholders.

Consistent with our practice of not accepting high-value gifts, employees are generally prohibited from giving high-value gifts to a business partner. The Legal department can assist with determining whether a gift is high-value and any exceptions must be approved in advance by this department. Offered gifts should also comply with the company policies of the receiving party. Always register and record any gift exchanges in liaison with your supervisor. Transparency is always the best behavior when exchanging gifts.

Business entertainment describes a meeting of representatives from the Company and one or more other companies, agencies, or other organizations where attendees share a meal, a performance, or other event. Business entertainment is not considered to be a prohibited gift provided that it complies with all organizational policies of the attendees. If you have a question about gifts or entertainment, or suspect prohibited activity, please contact the Legal Department, or you may make an anonymous report with the Ethics Hotline.

Company Expectations and Values

- Do not offer or participate in business entertainment that is excessive, lavish or extravagant; or, conducted at a location and/or in a manner that could harm the Company's reputation.
- Do not receive or give gifts or business entertainment that creates the appearance of conflict of interest or that seeks to influence a business or personal decision.
- Do not give gifts that are cash or cash equivalents, like gift cards.



We do not tolerate bribery and corruption

Employees are prohibited from offering or accepting bribes to gain or to conduct business, or to obtain any other benefit. Otherwise stated, employees should not directly or indirectly give, offer, promise, or authorize anything of value – no matter how small – to any government representative (including government owned or controlled entities) in order to secure a business advantage, influence a business decision, or induce an abuse or violation of a government position. Government representatives include any national, state, provincial, local, or other government sub-division official, employee, agent, or political candidate. This prohibition should be interpreted broadly and it applies to any individual acting on the Company's behalf, including suppliers, distributors, contractors, consultants and agents.

Diversey complies with the Foreign Corrupt Practices Act (FCPA), the UK Bribery Act and all similar statutes applicable in each jurisdiction. Therefore, despite certain countries' tolerance of bribes, such as payments exchanged for expedited services, bribery violates Company policy and we do not permit it. We are a global company and our reputation matters.

Employees must obtain pre approval from the Legal department before offering any government official a gift, item of any value, or provision of entertainment or hospitality. If you have a question about bribery or corruption, or suspect prohibited activity, please contact the Legal Department, or you may make an anonymous report with the Ethics Hotline.

Company Expectations and Values

- **Never offer, promise, or provide anything of value (no matter how small) to a government official or other third party in order to gain a business advantage.**
- **Do not instruct, authorize, or allow a third party to make a prohibited payment on your or the Company's behalf.**
- **Do not make a payment to a third party knowing or having reason to believe that it is likely to be used to improperly provide something of value to a government official or other individual.**
- **Always follow the proper report and record process by submitting accurate, complete information of any payment made.**





We comply with competition and antitrust laws

Antitrust laws (also referred to as “competition laws”) govern competitive conduct, and apply to the Company’s relationships with other manufacturers, competitors, suppliers, brokers, and customers. The laws are often very broad and complex, and vary from country to country; however, they share the same goal – to encourage free and fair competition. Every employee is required to always comply with relevant antitrust/competition laws both at national and international levels, and across all jurisdictions in which the Company operates. Every Company action we perform has to comply with the rules of fair competition. No Company action should prevent, restrict, or distort competition. We aim to compete with integrity worldwide, which allows us to protect our most valuable asset – our reputation.

Penalties for violating antitrust laws are severe, and include significant fines and other monetary liability. In addition, employees who authorize or participate in violations can face imprisonment in many nations. As with most laws, ignorance of what constitutes a violation of these laws is no defense.

Because circumstantial evidence is frequently the basis upon which antitrust liability is found, avoid even the appearance of anti-competitive conduct. If you have a question about antitrust or anti-competition practices or laws, or suspect prohibited activity, please contact the Legal Department, or you may make an anonymous report with the Ethics Hotline.

Company Expectations and Values

- Follow all applicable antitrust and competition laws.
- Consult the Legal Department immediately whenever you have an antitrust or competition law question, or if you suspect you may have been part of an anti-competitive conversation or interaction (e.g., agreeing with a competitor or supplier to fix prices).
- Do not enter into any agreement or understanding with any competitor regarding price.
- Do not discuss any past, present, or future prices, market promotional programs, sale terms, or related subjects with any competitor. Likewise, leave or end any discussion of the same a competitor attempts to have with you.
- Do not attempt to stop or interfere with competition among the suppliers or distributors.



SOCIAL AND ENVIRONMENTAL RESPONSIBILITIES

We are a socially and environmentally responsible company and actively engaged in growing a better world

We are dedicated to enhancing the quality of people's lives through our commitment to sustainability, health and wellness, and social responsibility. We commit to operate in a sustainable manner by evaluating and improving our social and environmental impacts. We will integrate sustainability targets into company objectives, embrace best practices, and communicate our results to stakeholders.

We strive to comply with all applicable environmental laws and regulations. We are vigilant in preventing accidents, spills, and any other potential threats to the health and safety of our communities and our planet.

The Company commits to compliance with all applicable environmental regulations where we manufacture, sell, or distribute products. We commit to the efficient use of water, energy and raw materials in our operations. We understand that efficiency and waste reduction lowers our environmental impact, mitigates operational risk, decreases operational costs, and generates competitive advantage.

The Company commits to engaging and collaborating with suppliers to ensure they are complying with environmental regulations and not posing risks to

the environment. Suppliers are expected to have all applicable environmental permits in place. We commit to providing employees with a safe, healthy and hygienic working environment, including but not limited to regular disinfecting and cleaning housekeeping, safe driving and parking practices, adequate emergency procedures, fire safety, and management of hazardous materials. The Company will integrate sustainability targets into our objectives, embrace best practices, and communicate our results to stakeholders. We strive to comply with all applicable environmental laws and regulations. We are vigilant in preventing accidents, spills, and any other potential threats to the health and safety of our communities and our planet.

The Company has been, and always will be, a pioneer and facilitator for healthy and safe living. We constantly deliver revolutionary cleaning and hygiene technologies that provide total confidence to our customers across all of our global sectors. Headquartered in Fort Mill, South Carolina, USA, Diversey employs approximately 8,500 people globally. For more information, visit www.diversey.com or follow us on social media.

Company Expectations and Values

- **Make sustainability a personal goal – conserve electricity, recycle resources, and be conscious of your individual impact on the environment.**
- **Report any environmental health and safety hazards right away, including spills, leaks, and other potentially dangerous situations that cannot wait.**
- **Ensure suppliers and other business partners are committed to following environmental regulations and human rights laws.**
- **Actively participate in our programs and initiatives to improve the world and communities.**
- **Ensure every employee works in a safe, healthy and hygienic environment.**

www.diversey.com

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