CODE OF ETHICS





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INTRODUCTION

PIERRE-ETIENNE DEHON CHAIRMAN

"the common denominator of our efforts has always been our vocation of service" O. J. Dehon (1923-2010)

Founded in 1874 and family owned since 1931, the Dehon Group today has more than 700 employees in more than 15 countries. If, over time, our company has grown, deployed and diversified, we must come together around the values that have driven the group from the very start. On a daily basis, we are all involved in decisions and actions that impact the group and its reputation. Therefore, we are each called upon to consider and defend our values, which include integrity, benevolence, respect and responsible development, while also respecting the basic rules of conduct that flow from them.

The purpose of this code of ethics is to remind all employees of our group's main principles and values. That is why we must each act as guarantor of this code of ethics in whatever we do within the group.

VALUES

RESPONSIBLE DEVELOPMENT

The group develops in a responsible and sustainable way by responding to current needs with a long-term vision. Thus, our group pursues sustainable profitability while taking care to respect individuals and take the environment and the security into account.

INTEGRITY

Integrity must be a fundamental part of the entrepreneurial function. Honesty, righteousness and respect for the individual are paramount in both the work that we do and our internal and/or external professional relationships. These principles create trust and promote the company's success.

INNOVATION

With consideration for our customers' expectations and in pursuit of continuous improvement, we want to be a driving force for change and position innovation at the heart of our action.

BENEVOLENCE

Benevolence must permeate our relationships. A spirit of service is also essential. We want to encourage commitment and solidarity, while valuing hard work, dedication and loyalty.

FAMILY ENTREPRENEURSHIP

Family entrepreneurship is an essential component of the group. This spirits places human values at the core of our company, while maintaining high performance levels in order to guarantee its sustainability.

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The principles described below are the extension of the group values and culture. Whether managers or employees, these values and principles apply to us all in the conduct of our business, whether among ourselves or with our partners, suppliers or customers. In this way we are players, guardians and guarantors.

This code of ethics applies to all subsidiaries of the Dehon Group as well as to all group employees (including temporary workers, interns, Business Volunteers Abroad (BVA) and such like) and managers.

I. HUMAN RIGHTS

The Dehon Group strictly complies with applicable legislation human rights, prohibiting, inter alia, child labour and forced labour. All forms of slavery and inhuman or degrading treatment are forbidden. Similarly, any form of discrimination based on ethnicity, colour, sex, political or religious convictions, disability, trade union membership or social background is prohibited. The right to belong to a trade union and the right to association as well as the right to collective bargaining must be scrupulously observed and respected.

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II. WORK AND WORKING CONDITIONS

The Dehon Group undertakes to respect each individual and ensures that each employee has a respectful and dignified working environment.

Equality of opportunity and treatment are core values, especially in the areas of recruitment, access to training, pay and professional development

Any form of harassment, intimidation or violence in the workplace are strictly forbidden and subject to disciplinary action.

The Dehon Group calls for vigilance in these matters and the prevention of psycho-social risks.

Any employee who considers himself to be a victim of, or a witness to, differential treatment must refer the matter to their line manager or to a human resources manager.

III.HEALTH, SAFETY & HYGIENE

Hygiene, safety and health matters are constant priority concerns within the Dehon Group. Every employee has the right to work safely in a healthy workplace in accordance with the applicable legislation.

Safety and security instructions must be scrupulously observed at each of our sites and especially at industrial plants.

The individual means of protection made available and necessary for certain tasks must be systematically used.

The Dehon Group strives to take action to prevent risk situations and also to manage them, if necessary, through a crisis management system for the most critical cases. Each employee must to be an active player in workplace safety.

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IV. QUALITY & ENVIRONMENT | RESPONSIBLE CARE

The Dehon Group takes fully part of a voluntary approcah to improve the health, safety and environmental performance of the global chemical industry.

The Dehon Group thus contributes to the global chemical industry's common commitment, as set out in the Responsible Care®1charter, to the safe management of chemical products throughout their life cycle and to the promotion of their role in improving quality of life and their contribution to sustainable development.

The Dehon Group has established a management system based around the principles of ISO 9001 in order to guarantee the quality of the products and services it offers.

V. INTEGRITY & TRANSPARENCY IN BUSINESS

Every employee and manager must adopt an ethical and regulatory approach in the conduct of their business. The Dehon Group undertakes to comply with legislation in addition to the ethical principles described in this code of ethics in every country where it operates and, especially, the following ethical and/or regulatory principles:

Prevention of conflicts of interest:

A conflict of interest arises when an employee's professional activity intersects with their personal interests or those of their family. That could mean, for example, entering into contract with a company in which one has a direct or indirect interest. All situations of conflict of interest must be handled transparently with respect to line managers and in compliance with the applicable regulations. Our professional decisions must only be guided by the interests of the Group.

· Gifts and invitations

Within our business relationships, no gift or invitation may be accepted or offered if it can be seen as intended to exert influence or as consideration for obtaining an agreement, authorisation or undue advantage.

Besides this situation, any gift or invitation that a customer, supplier or partner may offer or that one may wish to give as a goodwill gesture within a business relationship is acceptable only if it is transparent, occasional, in accordance with the applicable regulations and of a reasonable value compared to commercial uses.

Export control:

The Dehon Group is subject to those international laws which regulate, restrict and occasionally prohibit business relations with certain countries, organisations or individuals and/or for certain purposes. Furthermore, special rules apply to dual-purpose products and technical data or those used for military purposes.

Each employee should inform himself with these restrictions and should not take any action that might infringe these regulations.

Data protection

Each Employee may be required to hold information that must remain confidential insofar as its disclosure or revelation could be harmful to the Group's interests.

This information may involve people, products, research, technical projects, industrial data, commercial and financial plans, social information and all those elements likely to fall within the scope of intellectual property and knowhow. It is each person's responsibility to ensure that this information is not released outside the company, nor even given to company employees who are not authorised to know it.

Our respect for others also includes respecting and protecting personal information regarding our employees, temporary employees, customers, suppliers, applicants, partners and individuals.

Competition law

When dealing with our customers, distributors, suppliers or competitors, business must be conducted in a spirit of fair competition and innovation. Any action, agreement or discussion, even of an informal nature, which has the purpose or effect of distorting free competition is strictly forbidden in accordance with the applicable legal provisions.

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Pierre-Etienne DEHON

Chairman

Pascal DEHON

Vice Chairman

Luc DEHON

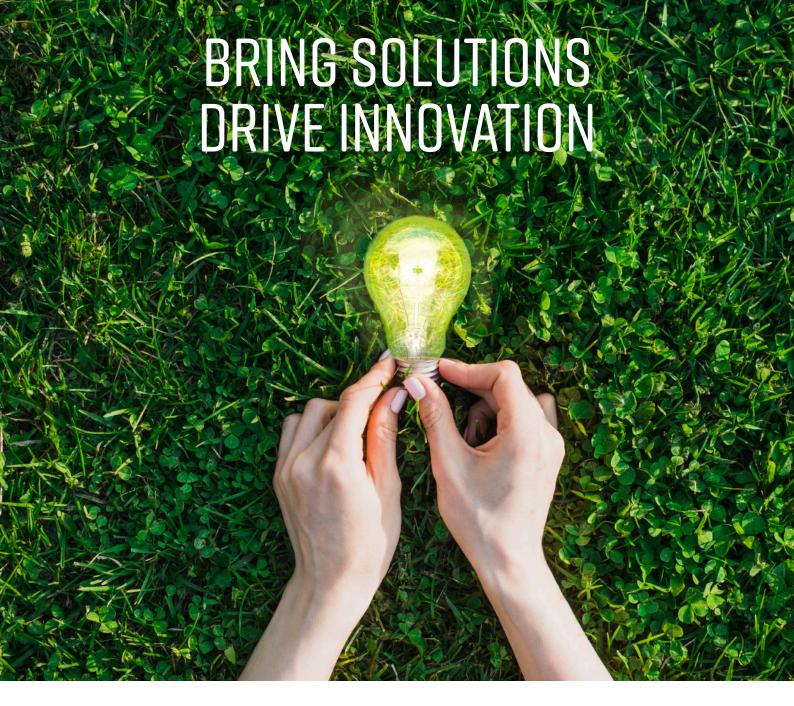
Executive Managing Director

· Fights against corruption

The Dehon Group condemns and prohibits all forms of corruption. Corruption may be defined as any act by which a person entrusted with a specific function, in the public or private sector, wrongfully solicits/proposes or accepts, directly or indirectly, offers, promises, gifts, presents or advantages of any kind, for himself or for others, in order to perform or refrain from performing any act of his function, mission or mandate or facilitated by his function, mission or mandate, in breach of his legal, contractual or professional obligations.

VI. CONCLUSION

An ethical approach in the conduct of our business is essential for the reputation, image and notoriety of the Dehon Group. Each employee of the Dehon Group is expected to implement each of the principles set out in this code of ethics in the exercise of his business. It is also expected that these principles should be promoted to our partners, customers, suppliers and service providers.





Company founded in 1874