OUR CODE

THE LATICRETE GLOBAL CODE OF CONDUCT
All employees must complete the LATICRETE Global Code of Conduct Training, confirming that they understand it and agree to abide by its provisions.
Dear LATICRETE family member:

Our company is growing every day as we work to achieve our vision to be a top 10 construction chemical company.

Your dedication to superior customer service and quality products has brought us so far—from an entrepreneurial couple’s basement to a presence on every continent! And you honor our founder’s ethics by having our values-driven culture guide all of your decisions.

This Global Code of Conduct is provided to help us all steer the course of our company’s continuing legacy. Think of it as your compass. Keep it top of mind each day to navigate through the challenges and successes that lie ahead. For employees, board members, subsidiaries, JV partners, agents and contractors—“our code” is here to help us all do the right thing and play by the rules, wherever in the world we operate.

One of our core values is to act and lead with integrity. Integrity is the cornerstone of our code of conduct. I define integrity as doing the right thing when no one is looking.

Thank you for your continued dedication to upholding these standards.

David A. Rothberg  
Chairman/CEO
Responsibility for Compliance

The LATICRETE Global Code of Conduct applies to all employees. It is designed to help all of us understand our ethical responsibilities and act in compliance with them, by observing our workplace policies and applicable laws and regulations when engaging in business activities.

This code cannot provide definitive answers to all questions. For that, we must rely on each person’s judgment and integrity. You are encouraged to seek guidance when a situation may not be clear.

If you observe behavior that concerns you, or that may represent a violation of our code, raise the issue promptly. Doing so will allow the company an opportunity to deal with the issue and correct it, ideally before it becomes a violation of law or a risk to health, security or the company’s reputation.

Raising Concerns

You may contact your supervisor, any member of the LATICRETE management team, or the VP, Human Resources to raise any issues, questions and concerns about this Code of Conduct or its interpretation. You may choose to remain anonymous; however you are encouraged to identify yourself to facilitate communications. If you make your identity known, the company will make every effort to keep your identity confidential as a thorough and fair investigation is conducted.

The company values the help of employees who identify potential problems that need to be addressed. It strictly prohibits any retaliation against an employee who raises a concern about a potential violation of the code.
Respect for Our Employees

LATICRETE is committed to providing an environment that values diversity and expects all employees to treat one another with respect and dignity.

We are committed to equal opportunity. This means providing a workplace that prohibits discrimination on the basis of age, color, physical or mental disability, past or present history of disability, genetic information, ethnicity, marital or family status, national origin or ancestry, race, religion, religious creed, gender, pregnancy or related medical conditions, sexual orientation, gender identity or expression, veteran status and other protected characteristics.

We are also dedicated to extending fair treatment to employees and applicants in all recruiting, hiring, training, promotions, transfers, workforce reductions, and pay and benefits practices.

LATICRETE promotes and maintains a professional working environment where employees act with respect for one another and for those with whom we do business.

Our objective is to create a work environment where people feel respected and the diversity of our employees reflects the diversity of the population wherever we operate.

Harassment

LATICRETE employees have the right to work in an environment that is free from intimidation, harassment and abuse. Conduct by an employee that creates a hostile work environment will not be tolerated. This includes, but is not limited to, verbal or physical abuse and unwelcome sexual advances. Employees are encouraged to help each other by speaking out when a co-worker’s conduct makes them or others uncomfortable and are responsible for promptly reporting harassment when it occurs.
Substance-Free Workplace

LATICRETE adheres to a drug-free and alcohol-free workplace policy which applies to employees, vendors, customers and guests.

Health and Safety

Safety lies at the core of every single action we take. At LATICRETE, we believe safety equates to how we take care of each other. We proactively address safety by identifying, reporting and investigating potential hazards from the bottom up, and we actively manage risk throughout the company from the top down.

It is the company’s intent to provide a safe and secure working environment for its employees, visitors, contractors and vendors. If any employee becomes aware of unsafe working conditions, or has concerns involving safety, he/she should contact his/her supervisor immediately. Actions by employees which jeopardize the safety and welfare of co-workers will not be tolerated; such behavior may result in disciplinary action, up to and including termination of employment.

LATICRETE is committed to compliance with all applicable laws, regulations and record-keeping requirements and seeks to avoid all injuries. It is the responsibility of each employee to follow all company policies and procedures related to workplace health and safety.

Environment

LATICRETE is committed to protecting the quality of the environment around the world through sustainable environmental practices. We will meet or exceed environmental laws and regulations in the countries where we operate.

Employees are encouraged to identify opportunities for improving our environmental performance, including, for example, conservation, recycling and energy use programs that promote clean air and water.
Quality and Compliance

LATICRETE maintains the highest quality standards for our products. We deliver value to our customers by providing high-quality products that meet or exceed our customers’ requirements, standards and regulations.

Everyone at LATICRETE has the responsibility to communicate events or issues that are unsafe, that do not comply with our quality policies or procedures, or that could adversely affect our product.

Business and Financial Records

LATICRETE is committed to maintaining and providing accurate and timely financial information. Our owners and lenders rely on LATICRETE to provide accurate information about its business and to make responsible business decisions based on reliable records. No employee may make any false or misleading entry or misrepresentation in any business document of LATICRETE. It is the responsibility of each employee to uphold these standards and record information correctly and honestly. This not only includes information regarding financial accounts, but other records such as quality reports, time records, expense reports and submissions such as benefits claim forms.

All communications and interactions with customers, suppliers, government agencies or others inside or outside the company are expected to be truthful and forthright.

It is the responsibility of all employees to know their area’s record retention procedures, including how data is stored and received and to comply fully and accurately with all audits.

Conflicts of Interest

The owners and investors in LATICRETE expect that business decisions by its employees will be made based on the best interests of the company. Actions must be based on sound business judgment and not motivated by personal interest or gain. Any situation that creates or appears to create a conflict between personal interests and the interests of LATICRETE must be avoided.
Employees should notify Human Resources immediately if:

- An employee or an immediate family member has any significant financial interest in a LATICRETE supplier, customer, consultant or competitor
- An employee serves as a director, officer or consultant with any company that does business with LATICRETE
- An employee finds he/she has, or is considering the assumption of, a financial interest or outside relationship that might potentially involve a conflict of interest with LATICRETE, or if an employee is in doubt as to the proper application of this policy

**Business Gifts and Entertainment**

All business decisions should be based strictly on the best interests of the company. Employees should not give or accept any gifts in excess of $50 in value to or from anyone with whom LATICRETE does business without reporting such gifts to our General Counsel, VP of Finance, or VP of Human Resources. Extending or accepting gifts of significant value can create the appearance of a conflict of interest. Gifts or entertainment given to or received from customers or suppliers must never unduly influence or appear to unduly influence business decisions. However, entertainment given to or received from customers, suppliers, regulators or other parties with whom the company has business dealings is normal and acceptable when done in a business setting, is for legitimate business purposes, and is not excessive under the circumstances.

Federal law and LATICRETE policy prohibit payments to foreign government officials or their families in order to influence decisions regarding obtaining or retaining business. All government-related transactions and relationships must comply with applicable local, state, and national laws. LATICRETE employees, agents and contractors are required to read, acknowledge and abide by the company’s Anti-Bribery and Anti-Corruption Policy.

Giving gifts to or entertaining government officials is highly regulated and often prohibited. Such gifts and entertainment should not be provided unless you have received Law Department approval.

There must be a legitimate business purpose for any business gift or entertainment; it must be in good taste and be consistent with both the laws and the giver’s and receiver's policies (including the Travel and Entertainment Policy).
Customers, Suppliers and Competitors

In all of our business dealings with customers, suppliers and competitors, we will:

- Always present our services in an honest and straightforward manner
- Treat all customers and suppliers fairly and objectively
- Select suppliers based on value, and communicate our expectation of competing fairly for our business
- Compete with high ethical standards and integrity
- Never comment on a competitor’s service without a good basis for such statements
- Never discuss or share with competitors our prices, rates or terms of commercial service in violation of applicable antitrust or other laws

Political and Community Responsibility

LATICRETE encourages employees to participate in community activities. However, decisions by our employees whether or not to contribute to or participate in a charitable organization are strictly personal and voluntary.

We will comply with legal requirements in promoting the company’s position to government authorities and in making political contributions. Employees’ participation in political activities is voluntary and must be carried out on personal time.

Media and Financial Community

LATICRETE has certain legal and other obligations regarding how it makes news of significant events affecting the company available to the public. While the company encourages employees to responsibly exercise their First Amendment rights, under no circumstances should confidential and proprietary information about the company’s products, services, or customers, such as trade secrets, client lists, pricing information, sales strategies, launch dates, projections, performance goals or results
and market data, be disclosed to or discussed with any third party via social media or any other method. All communications with the news media, including finance and trade press and financial analysts, should be directed to the company Chief Executive Officer. Employees should not use internet bulletin boards, blogs, chat rooms or other means to discuss confidential matters or opinions about the company or to disclose “material” and “nonpublic” information about LATICRETE. “Material” information is any information that an investor might consider important in deciding whether to buy, sell or hold securities. Information is considered to be “nonpublic” if it has not been disclosed to the public. Employees who are aware of such “inside information” must be careful not to make such information, either intentionally or inadvertently, available to others who might use it for personal profit. If any public information regarding the company raises a concern with any employee, the employee should bring this concern to the attention of his/her manager or an officer of the company.

**Employee Data Privacy**

LATICRETE is committed to protecting employees’ personal information that is collected for customary and legitimate business purposes. Access to personal information within the company will be provided only to those who need it to carry out their designated responsibilities.

LATICRETE complies with all laws that apply to the handling of personal information. Personal information is protected from unauthorized access and disclosure through industry-standard data security policies and measures.

**Proprietary and Confidential Information**

LATICRETE will respect the confidential information provided to it by its customers, suppliers and other business partners. Confidential or proprietary information includes all nonpublic information that, if disclosed, might be harmful to the company.

During your employment, you might learn certain information concerning our manufacturing methods, product formulas, customers, suppliers, or business partners that is confidential, competitively sensitive, trade secret and/or proprietary. You should assume that company information is confidential, unless you
have been advised to the contrary or if LATICRETE has released the information publicly. You should take the necessary precautions to protect confidential information to which you have access.

Employees are strictly prohibited from disclosing proprietary and confidential information of LATICRETE or any of its customers, suppliers, other vendors, other employees, or business partners outside of LATICRETE and internally only on a need to know basis.

Email, the Internet and Use of Company Property

The use of company property such as buildings, vehicles, equipment and supplies is for the sole purpose of conducting business related tasks.

Employees should not have an expectation of privacy with regard to information stored or transmitted on company property. LATICRETE controls access to all communication equipment as well as reserves the right to monitor all communication, including internet usage, e-mail, voicemail, conferencing equipment, software and office supplies.

Responsibility and Investigation of Potential Code Violations

The responsibility for administering the Code of Conduct lies with the VP, Human Resources. LATICRETE takes all potential Code of Conduct violations seriously and is committed to confidentiality and a full investigation of all allegations.

Noncompliance with the Code of Conduct may have severe consequences for the company and the individuals involved. LATICRETE will use disciplinary action to address violations of the Code of Conduct. Violations of a serious nature may result in immediate suspension without pay or termination of employment. If you are aware of a possible violation of applicable laws or this Code of Conduct, you must report that information immediately to your supervisor; a member of management; the VP, Human Resources; and/or the General Counsel.