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# Policy

## Purpose & Scope

This Policy explains what a conflict of interest is and the requirements for disclosure. It aims to ensure transparency and integrity in all organizational activities by providing clear guidelines on recognizing and managing situations where personal interests could interfere with professional duties.

## Responsibilities

All Company directors, officers and employees are responsible for complying with this Policy.

## Identifying a Conflict of Interest

A conflict of interest arises when you have a personal interest in a transaction or situation that could affect your business judgment, loyalty to Albemarle or work performance. These conflicts are created in a number of ways based on family relationships and financial interests.

In accordance with the Code of Conduct, Albemarle personnel must make business decisions in the best interests of Albemarle, without bias or favoritism. You should avoid situations where personal activities, interests or relationships could affect or be perceived to affect your decision-making or work performance.

While it is not possible to list every circumstance, below is an outline of various types of conflicts of interest:

### Conflicts Involving Personal Relationships

- You or any **relative** is a **government** official or are currently running for a government position which is in a position of influence or authority over Albemarle's business
- You have a personal relationship (e.g., romantic, family) with an employee or job applicant in relation to whom you could influence their hiring, performance appraisal, salary, rating or promotion
- You have a personal relationship with a third party (e.g., contractor, supplier, customer), that Albemarle conducts business or expects to conduct business with and either party is in a position of influence or authority over business with Albemarle
- You are intending to request a donation to a charity on behalf of Albemarle, of which you or your **relative** is personally involved in the management of the charity (e.g., board member, grants manager, CFO, CEO, etc.)

**Conflicts Involving Financial or Business Opportunities**

- You or any **relative** own a **significant interest** in any entity that conducts business with Albemarle
- You or any **relative** is a director, officer, partner, employee, contractor, or agent of any entity that competes with Albemarle
- You own a **significant interest** in any entity that competes with Albemarle
- You personally are applying for intellectual property that is in any way associated with Albemarle's business activity
- You are intending to use Albemarle resources for personal benefit (e.g., use of company hardware, software, site, equipment, tools)

**Conflicts with Work Performance**

- You have alternate work or own a business that potentially could affect your ability to perform your job here at Albemarle
- You engage in other outside activity obligations (e.g., board positions, research) that potentially could affect your performance
- You currently are bound by a confidentiality agreement, non-competition agreement, or any other agreement that could prohibit or limit your work performance

**You are engaging in any other activity that could be perceived to be a conflict of interest.**

The receiving and offering of gifts and hospitality can raise the appearance of conflict of interest, refer to the Gifts & Hospitality Policy for guidance.

## Disclosing An Actual or Potential Conflict of Interest

If a conflict of interest is identified, it must first be disclosed to your supervisor. The matter will be discussed collaboratively to determine appropriate mitigation measures, which should then be documented in the **Conflict of Interest Disclosure Tool**. The employee is required to officially register the conflict and proposed mitigation within the tool, regardless of whether the conflict is actual or potential.

Global Ethics & Compliance will collaborate with you, your supervisor, and HR as necessary prior to clearing the conflict in the **Conflict of Interest Disclosure Tool**.

## Information and Guidance

If you have questions concerning this Policy, or if you realize an activity or situation could influence or appear to influence your ability to make objective business decisions, please contact [Global Ethics & Compliance](#) for advice.

## Definitions

**Relative** means an individual's spouse or spousal equivalent; the individual's and the spouse's grandparents, parents, siblings, children, nieces, nephews, aunts, uncles, and the spouse or spousal equivalent of any of these people; or anyone who shares the same household.

**Significant interest** means you own less than 5% of an entity that conducts business with Albemarle, you interest will not be considered significant. However, even if less than 5%, if your interest is sufficient such that it might appear, or in fact will, affect your business judgement and loyalty to Albemarle in your work performance then you should still consider the interest significant. For example, if the interest represents a large percent of your personal net worth, though less than 5% of the entity, it should be considered significant.

**Government Official** is defined broadly, and can include:

- an officer, employee or anyone acting on behalf of any government body including a department or agency at any level (national, regional, or local). Examples include a government minister, regulator, judge, city mayor, police officer, soldier, customs official or chemistry professor at a public university;
- an employee of public international organization such as the United Nations and World Bank;
- an employee of state-owned or controlled enterprises, such as refineries;
- a political party, party official or candidate for political office; and
- a person holding an appointment, position or office created by custom or convention, such as, a local community leader or member of a royal family.

## Related Policies, Procedures or Other Documents

- a. [Code of Conduct - Managing a Conflict of Interest](#)
- b. [Gifts and Hospitality Policy](#)
- c. [Conflict of Interest User Guide](#)
- d. [Conflict of Interest Disclosure Tool](#)