

G-3 CHICKADEE PURCHASER, LLC

BUSINESS CODE OF CONDUCT

INTRODUCTION

G-3 Chickadee Purchaser, LLC (the "Company") purchased certain chemical manufacturing assets from The Goodyear Tire and Rubber Company ("Predecessor"), which had a well-developed and publicly available Business Conduct Manual. The Company agrees with the principles set forth by its Predecessor. This Business Code of Conduct ("Code") provides a succinct statement of the legal and ethical principles of the Company, and it is a guide to the behavior that is expected of all employees, officers, and representatives of our organization. The principles of this Code are designed to apply not only to the Company's employees but also to those with whom the Company does business, and in particular any involved in selling or moving our products and to our Suppliers.

The Company is committed to act with integrity. This means that it will comply with all applicable laws and regulations. But more generally, it will act ethically and with integrity. The Company expects the same integrity from all of its employees, from everyone who acts on behalf of the Company, and from our suppliers. Acting ethically, with integrity, and in compliance with all applicable laws, not only is the right thing to do, it is contractually expected of us by our customers, and we demand it from those who work with us.

1.0 COMPLIANCE WITH LAWS AND REGULATIONS

A baseline for the Company is that it and all of its employees and agents must act in compliance with all applicable local, state, national, and international laws, rules, and regulations. It is the responsibility of everyone to be aware of and follow the legal requirements relevant to their work. Any questions about the legality of actions should be directed to the Legal Department or an Ethics Director. Another easy way to report is through the Ethics hotline at 1-833-596-6637. If you have questions about something you see or an action you might take, say something before proceeding. Speaking up now can avoid greater issues in the future.

While compliance with all applicable laws is required, some areas of special note are:

- a. **Complying with Environmental, Health and Safety ("EHS") laws.** The Company wants to ensure that it operates safely and acts appropriately to protect its employees, the community and the environment. This means that all actions and operations must comply with EHS laws, and all records required by those laws must be maintained accurately with reporting done in compliance with the laws.
- b. **Complying with Anti-Bribery Laws.** The United States Foreign Corrupt Practices Act ("FCPA"), along with laws of other entities and jurisdictions, demonstrate the worldwide concern over bribery. The Company and all third parties engaging in business with it must comply with the

FCPA and all other applicable anti-bribery laws. The Company strictly prohibits giving and receiving bribes, and we will give up any business opportunity that can be won only by giving an improper or illegal payment, bribe, gift, rebate, kickback, or similar inducement.

- c. **Complying with Fair Competition Laws.** The Company is committed to fair competition and compliance with all antitrust and competition laws. Employees must not engage in price-fixing, bid-rigging, or sharing confidential information with competitors. All business practices should support a fair and open marketplace.

2.0 INTEGRITY AND HONESTY

The Company expects honesty and integrity in all business dealings. Employees must not engage in any form of fraud, theft, embezzlement, or misrepresentation. All records, reports, and communications must be accurate, complete, and truthful. This is required not only in records required by law but in all Company communications and records.

The Company relies on accurate information and reliable records to make responsible business decisions. These records serve as the basis for managing the Company's business and for compliance with various regulatory, tax and other obligations. These records must be accurate. The Company relies on its employees and representatives to keep and report records accurately.

3.0 RESPECT FOR PEOPLE

The Company is committed to a workplace that values diversity, inclusion, and mutual respect. Discrimination, harassment, or retaliation based on race, gender, age, religion, disability, sexual orientation, or any other protected characteristic is strictly prohibited. All employees should foster a positive and respectful work environment. The Company's respect for people extends to people outside the workplace, and for that reason, the Company is also committed to banning any form of forced labor or human trafficking from its supply chain.

4.0 CONFLICTS OF INTEREST

Employees are expected to avoid situations where personal interests may conflict, or appear to conflict, with the interests of the Company. If such a situation arises, it must be disclosed promptly to management, the Legal Department or the Ethics Hotline. Examples include accepting gifts from vendors, having a financial interest in a competitor, or engaging in outside employment that interferes with your responsibilities.

The Company expects all of its employees' actions and decisions to be made objectively and in the best interests of the Company. Employees must be free from any undue influence of personal or outside business interests that may appear to, or actually do, interfere with their working only in Company's best interests. Employees also must avoid personal or family relationships that conflict with their job responsibilities or the interests of the Company. If there is a question about a conflict or potential conflict, it should be brought to the attention of an Ethics Director or the Legal Department.

5.0 CONFIDENTIALITY

Employees are responsible for protecting sensitive Company information. Confidential information must not be disclosed to unauthorized parties or used for personal gain. All data must be handled in accordance with Company policies and applicable privacy laws.

6.0 DATA PROTECTION

The Company will conduct all of its business operations in a manner that actively protects personal privacy and complies with all applicable privacy laws. When legal and business requirements make it necessary for Company to acquire, record, store, use, or otherwise process personally identifiable information, the information must be handled appropriately. The Company requires that all of its employees and associates respect the privacy of colleagues, customers, and business partners. All data and other information received by the Company must be handled in accordance with the Company's Privacy Policy.

7.0 HEALTH, SAFETY, AND ENVIRONMENT

The Company is committed to providing a safe and healthy workplace and to minimizing our environmental impact. Employees must follow all safety protocols, report hazards or incidents promptly, and support initiatives that promote sustainability and environmental responsibility. Safety is a core value of the Company.

8.0 USE OF COMPANY ASSETS

Company assets, including equipment, facilities, and intellectual property, should be used responsibly and only for legitimate business purposes. Employees must protect these assets from theft, loss, misuse, or damage. Company provides employees with various assets and applications (for example, laptops, mobile devices, office supplies, tools, telephones, copiers, credit cards, automobiles) to carry out the Company's business. Employees are responsible for the careful, efficient and proper use of the assets and resources they are given to do their work, and they must protect the assets against misuse, damage, theft or other loss. Employees may make limited personal use of the Company's assets or applications if the use: (a) is only occasional; (b) does not result in more than nominal and incidental costs; and (c) complies with all applicable laws and Company policies, including this Code.

9.0 SAFEGUARDING INTELLECTUAL PROPERTY

The Company's trade secrets and other confidential and proprietary information give it advantages in its industry. If Company's confidential and proprietary information is disclosed and used by others, the Company could be exposed to financial loss or competitive harm. Confidential and proprietary information is information that has not been disclosed to the general public. Common examples include formulas, research projects, business and manufacturing processes, and trade secrets, as well as financial information, corporate strategies and information about relationships with customers and suppliers. Employees may have access to this kind of information in their jobs, and protecting the information against unauthorized disclosure is the responsibility of each employee and Company representative.

10.0 REPORTING VIOLATIONS

Any employee or representative of the Company who becomes aware of a potential violation of this Code is expected to report it promptly to management, to the Legal Department, or through the Ethics hotline. The Company will not allow any form of retaliation against individuals who make good-faith reports.

11.0 ENFORCEMENT

Violations of this Code by employees may result in disciplinary action, up to and including termination of employment. The Company will investigate all reported breaches and enforce this Code consistently and fairly.

CONCLUSION

Our Business Code of Conduct reflects our commitment to ethical behavior and responsible business practices. By adhering to these principles, we protect our people, our reputation, and our future success. If you have questions or need guidance, please contact your manager, an Ethics Director, or the Legal Department. You may also contact the Ethics Hotline at 1-833-596-6637.