

Code  
of *Business*  
*Conduct*  
and *Ethics*

kdc/one

# Letter from the *CEO*

Dear Colleagues,

As you well know, kdc/one is a global leader in custom formulation, package design, and manufacturing solutions for beauty, personal care and home care brands.

We have thousands of employees around the world, and our growth and success are thanks to you, our diverse and passionate teams providing world-class formulation support, unrivaled product and packaging design, and turnkey manufacturing solutions.

All of our employees are directly responsible for our ongoing success and the trust we earn from our customers.

As we continue to move our business forward, we encourage you to keep our core values close and consider them in every decision made: Innovation that inspires our customers; Passion that fuels our dedication; Accountability that anchors our teams; Excellence that propels our growth; Inclusion that drives our diversity; Well-being that sustains our energy; and Compassion that nurtures our environment and employees.

These core values are based on our business ethics and vision and are central to this Code of Business Conduct and Ethics, intended to help all employees conduct themselves in a manner befitting of an industry leader, wherever they are and whatever their role. This Code forms the foundation of who we are as we continue to grow, with a strong focus on ethics, compliance, and integrity. It also explains many of the basic rules and principles that should guide us all in our day-to-day work.

Our values are people-driven, focusing on respect and comradery. It is our belief that if we all follow this Code and hold ourselves to the highest ethical standards, we'll see the continued growth and success of kdc/one and the development of a positive and rewarding culture.

Please take the time to review the Code and commit yourself to always doing things the right way at kdc/one. If you have any questions about the Code, please reach out to your Human Resources Department.

kdc/one cannot succeed without each of you, and I want to thank you again for your hard work.

As an organization, we'll continue to emphasize our values and behaviors, we'll implement programs that support them, and we'll ensure greater visibility of the integrity of our business.

Regards,  
Nick

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# Purpose and Scope



This Code of Business Conduct and Ethics (“Code”) has been adopted by the Board of Directors (the “Board”) of the Company (together with its subsidiaries, “kdc/one”) and establishes the foundation for kdc/one’s governing principles, culture, and values. This Code sets forth the standards that must guide the behaviors and actions of our entire team – from officers, directors and members of management to all our employees. While it covers a wide range of business practices and procedures, these standards cannot and do not cover every issue that may arise, nor every situation where ethical decisions must be made; rather, they set forth key guiding principles that represent kdc/one’s policies and establish conditions for employment at kdc/one.

Our business success and the confidence and trust of our customers, investors and partners depend on our ability to foster a culture of honesty and accountability. Our commitment to the highest level of ethical conduct should be reflected in all of kdc/one’s business activities, including but not limited to relationships with employees, customers, suppliers, and our shareholders, and to interactions with governmental associations, the public, and other stakeholders.



# Application and Interpretation

This Code applies to all employees of the Company and its subsidiaries worldwide, as ONE global company.

All kdc/one employees, officers and directors must conduct themselves according to the language and spirit of this Code and seek to avoid even the appearance of improper behavior.

One of kdc/one's most valuable assets is its reputation for integrity, professionalism and fairness. We should all recognize that our actions are the foundation of our reputation and adhering to this Code and applicable laws is imperative. To this effect, we expect every employee, officer, and director to read this Code and to how it applies to the way they perform their business responsibilities..

This Code should be read in conjunction with [kdc/one's Policy for Reporting Concerns Related to Financial and Other Matters \(Whistleblower Policy\)](#).

In addition, some rules depend on the functions performed by a given person at kdc/one. For example, directors must comply with not only the rules laid out in this Code, but also with the rules laid out in the mandate of the Board and other committees on which they serve.

Members of management and employees must comply with the obligations laid out in their employment contracts and any other signed agreements, such as a confidentiality agreement. They must also comply with the requirements described in all of kdc/one's policies and procedures, the employee handbook, as well as the ethical rules and best practices applicable to their field of expertise. For additional information, members of management and employees should consult their immediate supervisor or their workplace's Human Resources Department.

Managers and other employees in a leadership position are also expected to lead by example and embody the highest standards of ethical business conduct. They must be proactive resources for others and convey to employees how this Code applies to their everyday jobs. The Company expects all of its leaders to create an environment where compliance is recognized and valued, and where everyone feels comfortable asking questions.

## *Key Resources:*

Legal: [legalservices@kdc-one.com](mailto:legalservices@kdc-one.com)

Communications: [communications@kdc-one.com](mailto:communications@kdc-one.com)

IT Security: [kdcitsecurity@kdc-one.com](mailto:kdcitsecurity@kdc-one.com)

EthicsPoint: [kdc-companies.ethicspoint.com](http://kdc-companies.ethicspoint.com)

Human Resources: [humanresources@kdc-one.com](mailto:humanresources@kdc-one.com)

# *kdc/one's Vision*

As a premier solutions provider, our people deliver the innovative edge necessary to exceed expectations through an unyielding dedication to flawless execution, inspired design, and exceptional service.

# *Mission*

We offer innovative solutions to drive our customers' business. We are supported by a diverse and passionate team of experts who provide world-class formulation, unrivaled product and packaging design, and turnkey manufacturing solutions. We are stewards of our customers' business and aim to continuously earn their trust by exceeding expectations.



# kdc/one's Values

*Innovation. Passion. Accountability.  
Excellence. Inclusion. Well-being.  
Compassion.*

kdc/one's success begins with a strong belief in these seven key values that reflect our entire organization, and the associated behaviors that support our culture.





# Innovation

*that inspires  
our customers*

Innovation is our way of thinking and is in our DNA. We bring it to life for our customers through our people, curiosity, technologies, and solutions. We see the world for what it can become, and that vision has been the inspiration for our success for more than 100 years.

# Passion

*that fuels  
our dedication*

At kdc/one, we're unstoppable. Our passion drives us to exceed expectations, find solutions, stay curious and deliver results. We foster a passion to learn, change, and adapt in order to offer end-to-end solutions for our customers. Our fun and collaborative work environment keeps us energized.

# Accountability

*that anchors  
our teams*

We do what we say we'll do. We take ownership of our actions, behaviors and decisions. Throughout the organization, we create an environment of trust where everyone can do their best work in order to have a lasting impact on our community, our customers, and our people.

# Excellence

*that propels  
our growth*

We strive to do things right, the first time. By co-creating with our customers and suppliers, we're continuously optimizing our operations and improving the quality of our products. We listen and forge relationships of understanding and respect to achieve our goals.



# Inclusion

*that drives  
our diversity*

We are united across identities, geographies, and cultures. We recognize that each employee has a unique perspective, and we celebrate these differences because they make us stronger. Inclusion improves innovation, builds relationships, and creates a sense of belonging. We prioritize diversity of thought to drive our inclusion efforts.

# Well-being

*that sustains  
our energy*

We create products that inspire others to live well, enjoy life to the fullest and experience the joy of others. We create opportunities for our employees to live better, safer lives, both at work and at home. We are fulfilled by our work and the interactions we have with each other.

# Compassion

*that nurtures our  
environment and employees*

We care deeply about people, our local communities and the world. This is demonstrated in the products and services we provide and in how we connect with each other. We focus our collective energy and attention on ensuring our communities are supported, uplifted, and thriving.

1.

*Business  
Integrity*

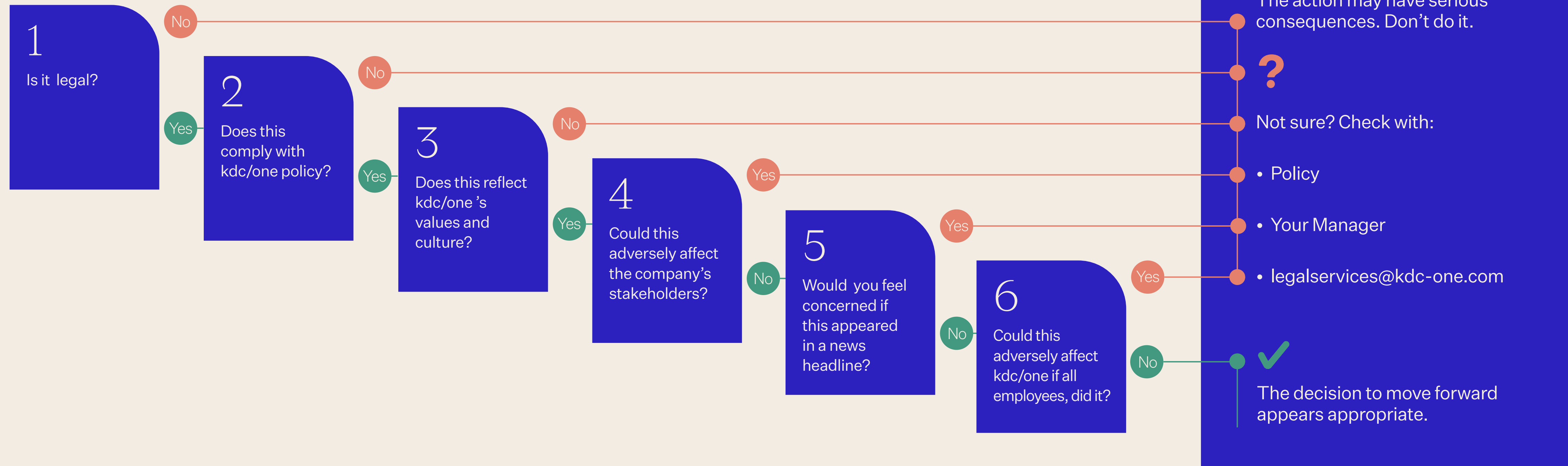
1.1

# Compliance with *Laws, Rules and Regulations*

We are strongly committed to conducting our business affairs with honesty and integrity and in full compliance with all applicable laws, rules and regulations. No kdc/one employee, officer or director shall commit any illegal or unethical acts, or instruct others to do so, for any reason.

## Ask Yourself: *Ethics Decision Tree*

Use the Ethics Decision Tree to assist you in determining the best course of action.



## 1.2

# Protection of Confidential Information



Confidential information generated, received, and gathered by our business is a valuable asset.

Protecting this information plays a vital role in our continued growth and ability to compete, as well as our ability to be a trusted partner in building and maintaining long-term relationships. All confidential information should be maintained in strict confidence, except when disclosure is expressly authorized by kdc/one or required by law.

All non-public information to which you have access during your employment or work with kdc/one is confidential information. Confidential information includes all information that might be useful to competitors or that could be harmful to kdc/one and its business partners if disclosed. Intellectual property, “know-how,” trade secrets, formulas, patents, trademarks, and copyrights; business, research and new product plans, objectives, and strategies; records; databases; salary and benefits data; employee medical information; customers, employees, and supplier lists; and any non-public financial or pricing information are confidential and must be protected.

Unauthorized use or distribution of confidential information violates kdc/one policy and contractual obligation and could be illegal. Such use or distribution could result in negative consequences for both kdc/one and the individuals involved, including disciplinary action and even legal remedies and criminal penalties. We respect the intellectual property rights and proprietary information of other companies and require our employees, officers, and directors to honor such rights.

You must return all proprietary information in your possession upon leaving kdc/one, but your obligations to protect kdc/one’s proprietary and confidential information continue even after you leave the company.



## 1.3

# Conflicts of Interest

Our employees, officers and directors have an obligation to act at all times in the best interests of kdc/one. All employees, officers, and directors should avoid situations that present a potential or actual conflict or appearance of conflict between their own interests and the interests of kdc/one.

A “conflict of interest” occurs when a person’s private interest interferes, or even appears to interfere, in any way with the interests of the Company, including its subsidiaries and affiliates. A conflict of interest may arise when an employee, officer, or director is in a position that may make it difficult for them to perform their work objectively and effectively. Conflicts of interest may also arise when an employee, officer, or director (or their family members) receives improper personal benefits as a result of the employee’s, officer’s, or director’s position with kdc/one.

Although it would be impossible to describe every situation in which a conflict of interest may arise, the following are examples of situations that may constitute a conflict of interest:

- Working, in any capacity, whether paid or not, for a competitor, customer or supplier while employed by kdc/one.
- Accepting gifts of more than modest value or receiving personal discounts (if such discounts are not generally offered to the public) or other benefits from a competitor, customer, or supplier as a result of your position with kdc/one.
- Competing with kdc/one for the purchase or sale of property, products, services, or other interests.

- Having an interest in a transaction involving kdc/one, a competitor, a customer, or supplier (other than as an employee, officer or director of kdc/one and not including routine investments in publicly traded companies).
- Receiving a loan or guarantee of an obligation as a result of your position with kdc/one.
- Directing business to a supplier owned or managed by, or which employs, a relative or friend.

Situations involving a conflict of interest may not always be obvious or easy to resolve. If you’re in doubt, don’t hesitate to turn to the Legal Department for advice.

In order to avoid conflicts of interest, employees, officers and directors must disclose to the Chief Legal Officer of the Company any material transaction or relationship that could be reasonably expected to give rise to such a conflict. Conflicts of interest involving the Chief Legal Officer and directors shall be disclosed to the Audit Committee of the Board.

# Key Questions to Identify Conflicts of Interest

- 1 Am I using a Company resource for my own benefit, or that of a relative?
- 2 Do I have a relationship that may appear to impact decisions I make for kdc/one?
- 3 Do I have an ownership stake in a business working or competing with the Company?
- 4 Is someone attempting to confer a benefit on me or a relative with the expectation of an advantage or benefit in return?
- 5 Would someone question my judgment based on something I'm doing outside of work or a relationship I have?

# The G.I.F.T. *Rule*

When giving or accepting gifts at kdc/one, you must consider the following:

## *Government Official*

These are never appropriate and if you are aware of any such attempt, please report it immediately.

## *Intent*

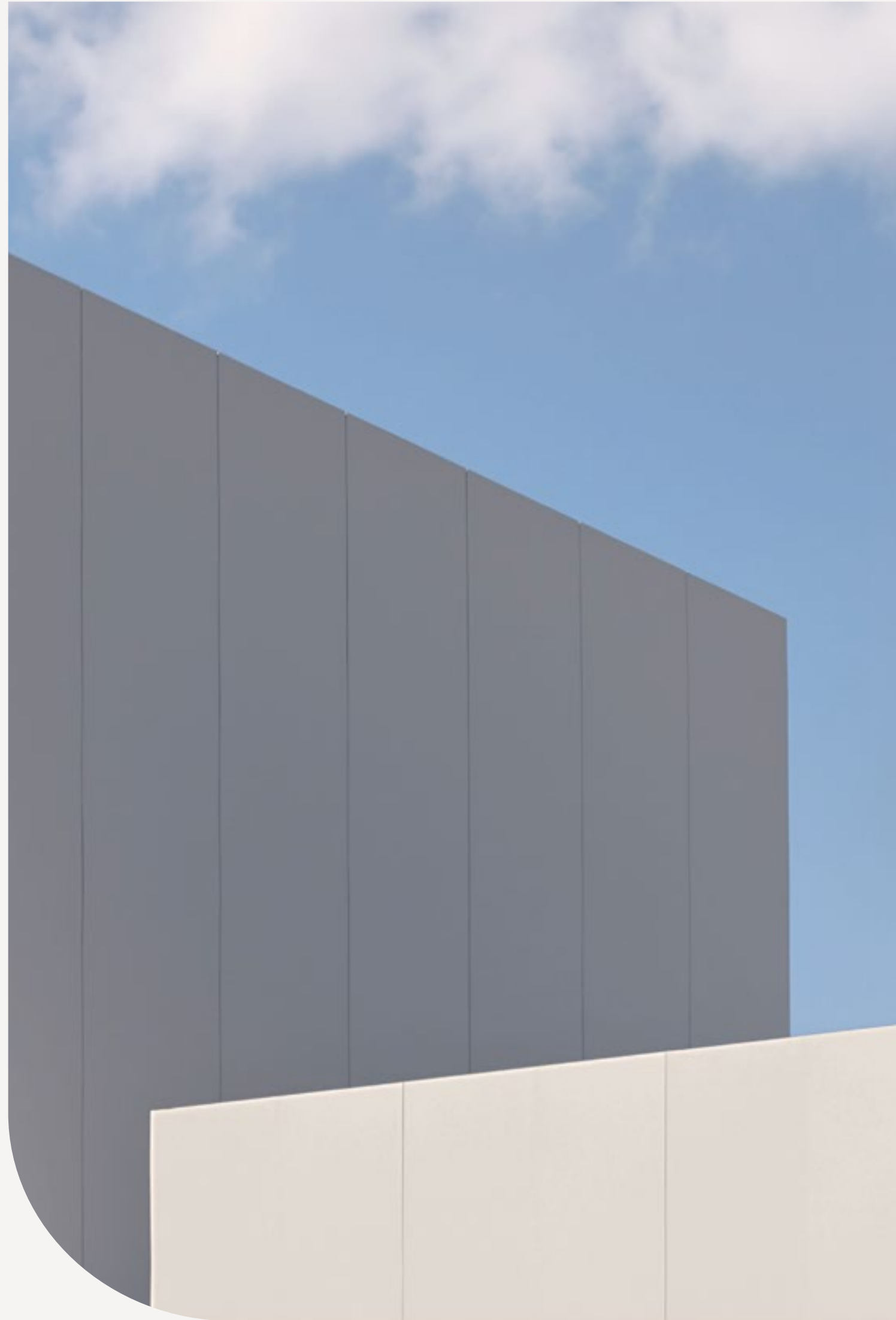
Consider the intent of the gift or offer. Could a stranger think there is “corrupt intent?” If it became public, how would it look?

## *Frequency and timing*

Think about when and how often gifts are exchanged. Are the gifts just occasional in nature and at appropriate times, such as the holidays? Do the gifts tend to come exactly when you are deciding on the award of a contract?

## *Too much?*

How grand is the gift or entertainment? Is the gift considered nominal? Is the offer within the other party’s limits? Remember that cash, and cash equivalents (such as gift cards or coupons) from outside parties are always against kdc/one policy.



## 1.4

# *Protection and Proper Use of Company Assets*

Protecting kdc/one's assets against loss, theft or other misuse is the responsibility of every employee, officer and director. Loss, theft and misuse of kdc/one's assets may directly negatively impact our profitability or reputation. Any suspected loss, misuse or theft should be reported to your direct supervisor or kdc/one's Human Resources partner present at your workplace.

The sole purpose of kdc/one's assets, including properties, equipment, vehicles, supplies, and technology, is to conduct kdc/one's business. These assets may only be used for Company business consistent with kdc/one's guidelines and policies.

## 1.5

# *Corporate Opportunities*

Employees, officers, and directors are prohibited from deriving personal benefit from business opportunities that are discovered through the use of corporate, assets, property, information, or position. No one may use corporate property, assets, information or position for personal gain, and no employee, officer or director may compete with kdc/one.

Competing with kdc/one may involve engaging in the same line of business as kdc/one, or any situation where the employee, officer or director deprives kdc/one of opportunities for the sale or purchase of products, services or interests. Employees, officers and directors owe a duty to kdc/one to advance its legitimate interests when the opportunity to do so arises.



## 1.6

# Fair *Dealing*

Each employee, officer, and director of kdc/one should deal fairly with customers, suppliers, competitors, the public and one another at all times and in accordance with ethical and fair business practices. No one should take unfair advantage of anyone else through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice. No bribes, kickbacks or other similar payments in any form can be made directly or indirectly to or for anyone for the purpose of obtaining or retaining business or obtaining any other favorable action. Any employee, officer or director involved may be subject to disciplinary action as well as serious civil or criminal liability for violating this policy. kdc/one may be exposed to civil and/or criminal liability as well.

Occasional business gifts of moderate value or entertainment of, non-government employees in connection with business discussions or the development of business relationships are generally deemed appropriate in the conduct of kdc/one business. Gifts to or entertainment of government officials is never appropriate. However, these gifts should be given infrequently, and their value should be modest. Gifts or entertainment in any form that would likely result in a feeling or expectation of personal obligation should not be extended or accepted. Cash and cash equivalents (such as gift cards or coupons) are never acceptable.



1.7

# Anti-Corruption / Anti-Bribery

Anti-corruption refers to the measures taken by organizations and government agencies to prevent bribery and other unethical behaviors while engaging in business, particularly in foreign jurisdictions. As an organization, we are committed to adhering to all anticorruption laws and regulations, such as the U.S. Foreign Corrupt Practices Act, the Canadian Corruption of Foreign Public Officials Act, the UK Bribery Act 2010, the anti-bribers provisions of the People’s Republic of China Criminal Law, the Brazilian Clean Companies Act and other similar anti-bribery regimes (collectively, the “Anti-Bribery and Corruption Laws”), ensuring our employees do not engage in activities that put the Company at risk.

Practices that are acceptable in a commercial business environment may be against the law or the policies governing federal, state, provincial or local government employees. Therefore, no gifts or business entertainment of any kind may be given or promised to any government employee without the prior approval of the Chief Legal Officer.

Anti-Bribery and Corruption Laws enforceable in the jurisdictions where kdc/one does business typically prohibit giving anything of value directly or indirectly (through an intermediary) to any “foreign official” for the purpose of obtaining or retaining business or in order to influence a decision. When in doubt as to whether a contemplated payment or gift may violate an applicable anti-bribery law, contact the Legal Department before taking any action.





1.8

## *Quality of Public communications*

Our public communications have to be fair, accurate, and understandable. kdc/one has established corporate media and communications policies and practices that must be followed at all times. For any questions or inquiries on this matter, contact the [kdc/one Communications Team](#).

1.9

## *Compliance with Antitrust Laws*

Antitrust laws prohibit agreements among competitors on such matters as prices, terms of sale to customers, and allocating markets or customers. Antitrust laws can be very complex, and violations may subject kdc/one and its employees to criminal sanctions, including fines, civil liability and even jail time. If you have any questions, consult the Legal Department.



1.10

# *Political Contributions and Activities*

Any political contributions made by or on behalf of kdc/one, and any solicitations for political contributions of any kind, must be lawful and in compliance with kdc/one’s policies. This policy applies solely to the use of kdc/one assets and is not intended to discourage or prevent individual employees, officers, or directors from making political contributions or engaging in political activities on their own. No one may be reimbursed directly or indirectly by kdc/one for personal political contributions.

1.11

# *kdc/one Ambassadorship*

Employees, officers, and directors of kdc/one are ambassadors of kdc/one and its network. All members of kdc/one have to represent kdc/one professionally, and act and communicate in a manner that upholds its good reputation and image at all times. This includes ensuring that the use of social media and other forms of digital or other communications is consistent with kdc/one’s corporate media and communications policies and practices. Our actions are seen to reflect those of kdc/one, therefore they must reflect the policies and standards of kdc/one.

1.12

# *Non-Retaliation Policy*

All employees are encouraged to speak up freely if they have concerns. kdc/one strictly prohibits and has a zero-tolerance policy when it comes to any form of retaliation, whether by a manager or coworker, against an individual because they made a good faith report of a legal or ethical concern. This non-retaliation policy also extends to anyone who assists or cooperates with an investigation or reports a legal or ethical concern.



2.

*Empowering  
People*

## 2.1

# *Equal Opportunity, Anti-Harassment, Anti-Discrimination*

kdc/one's policies on the recruitment, advancement and retention of employees forbid discrimination on the basis of prohibited grounds, including but not limited to race or ethnic origin, religion, age, disability, sexual orientation, political affiliation, union membership, nationality, gender identity, social background, or any other form of discrimination. Our policies are designed to ensure that employees are treated, and treat each other, fairly and with respect and dignity. In keeping with this objective, conduct involving discrimination or harassment of others, or any form of retaliation for reporting such conduct, will not be tolerated. All employees are required to comply with kdc/one's Diversity and Inclusion policies and guidelines, copies of which are available from the HR Department.

## 2.2

# Diversity and Inclusion

At kdc/one, we value and embrace diversity and inclusion as driving forces of our success. Promoting diversity and inclusion with all our employees across all of our business activities and sectors, and throughout all of our actions, includes, among other behaviors:

- Treating everyone *impartially* and with *respect*; *avoiding* stereotyping, discrimination and prejudice.
- *Interacting* and *communicating* with others in an open, compassionate, and *positive* manner.
- *Acknowledging* and *respecting* different beliefs, values, and practices.
- *Refraining* from aggressive, passive-aggressive, or confrontational behavior and communication.

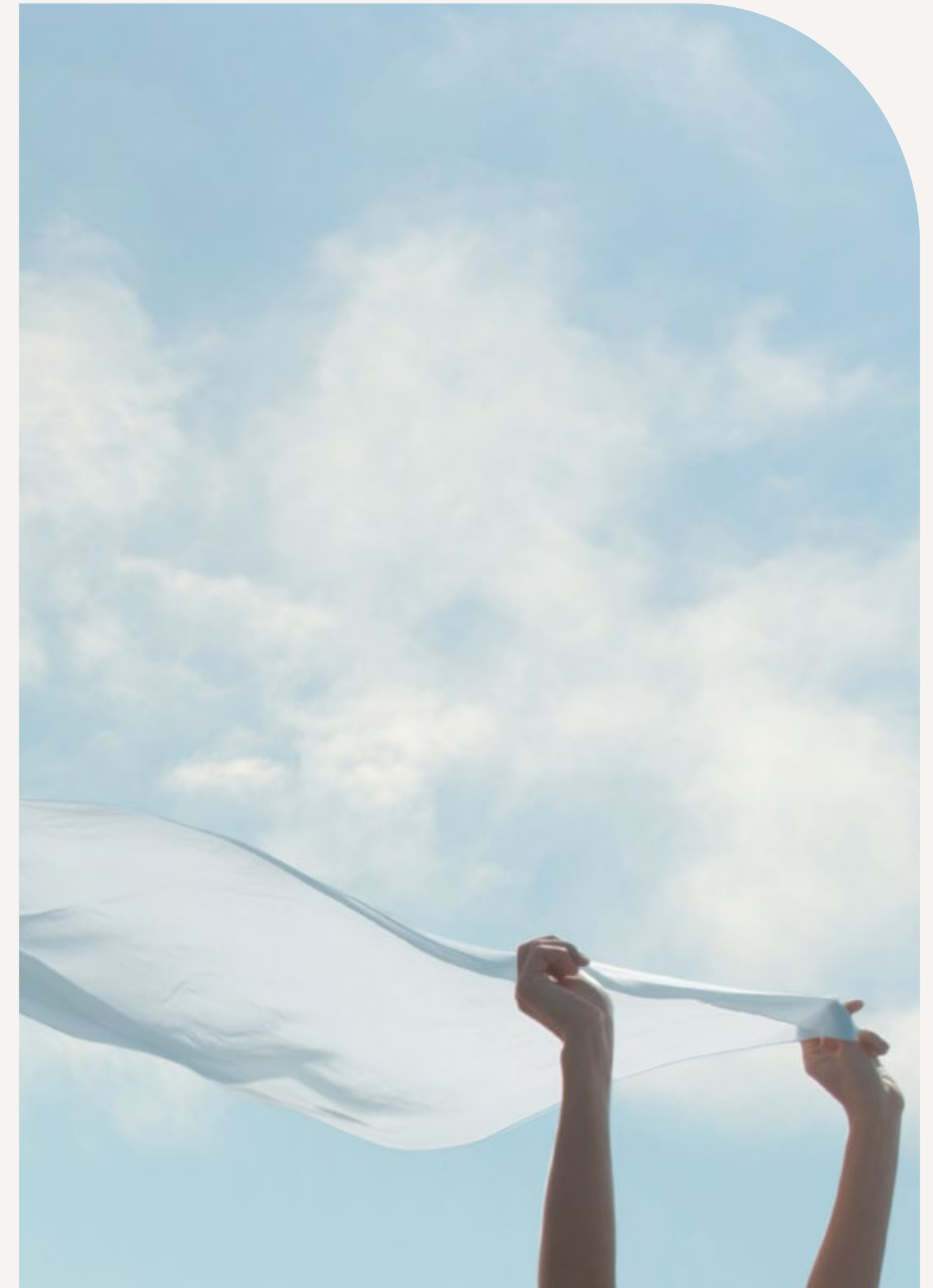
## 2.3

# Workplace *Health and Safety*

kdc/one strives to provide a safe and healthy work environment for its employees in order to avoid accidents or bodily injuries. kdc/one is committed to conducting its business in compliance with all applicable workplace health and safety laws and regulations.

This includes setting up procedures and offering training to prevent or mitigate as much as possible any workplace hazards or risks to the health, hygiene, well-being, and safety of every kdc/one employee.

kdc/one is committed to a balanced work environment enabling our teams to thrive at work while maintaining their general well-being. kdc/one selects, recruits, compensates, and organizes its workforce in full compliance with all applicable federal, state, and local employment laws and regulations.





3.

*Empowering  
Communities*

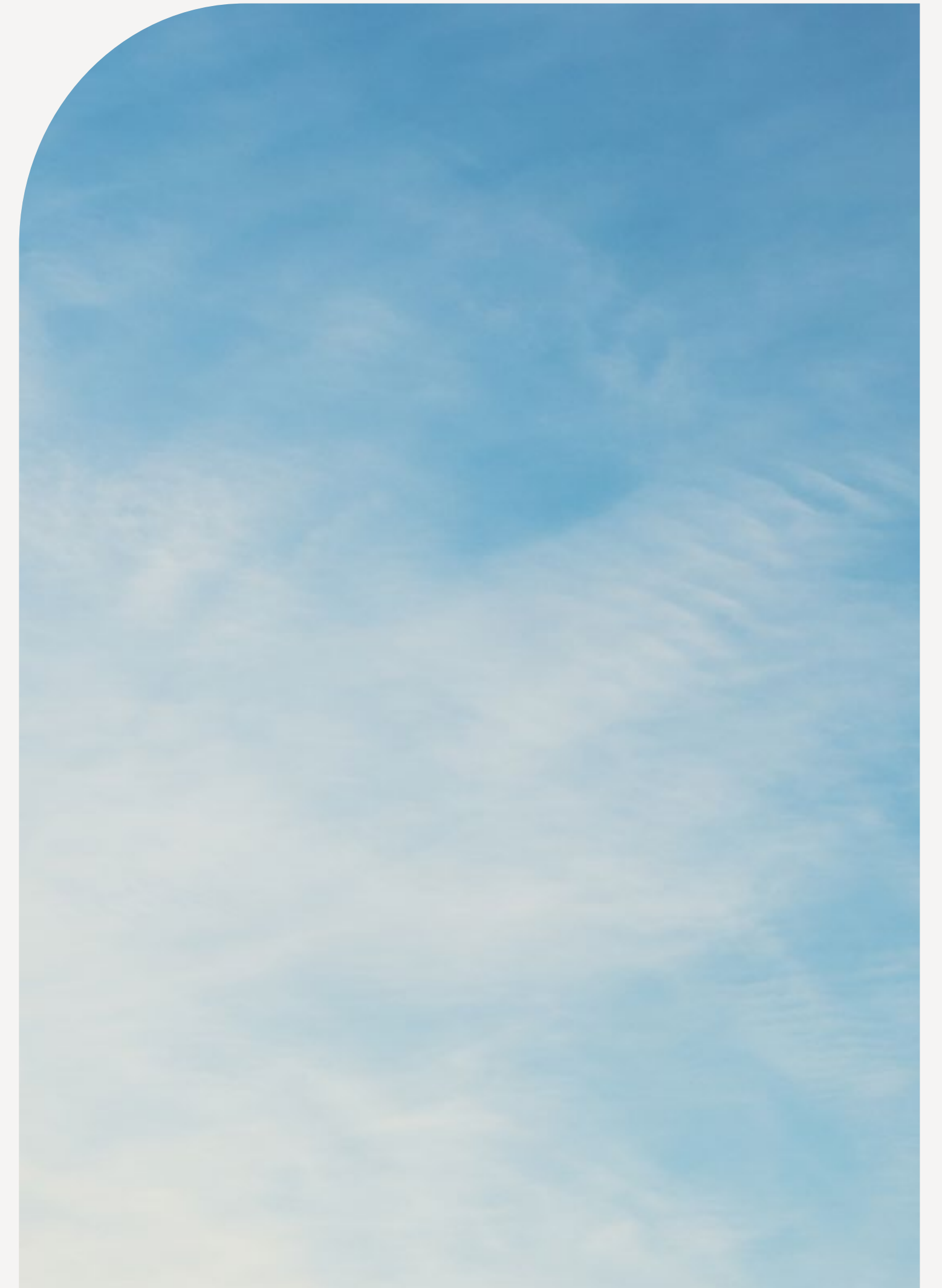
## 3.1

# Environmental Protection

Our goal is to avoid adverse impact and injury to the environment and to communities in which we conduct our business by implementing best practices, concrete measures and initiatives to demonstrably reduce the environmental impact of our activities. Achieving this goal is the responsibility of all officers, directors and employees, and makes good business sense. kdc/one conducts its business in compliance with all applicable environmental laws, regulations and standards.

Such *initiatives* include:

- The use of processes, technologies and materials that reduce the consumption of natural resources and leave the smallest environmental footprint.
- The limitation of waste production through, amongst others, proper waste management, elimination of air, water and soil pollution, reduction of greenhouse gas emissions with an emphasis on the use of renewable energies, reduction of water and energy consumption, and safe management of hazardous chemicals.
- Engaging and motivating all kdc/one employees, officers and directors by providing information and training on environmental issues.



## 3.2

# Product *Safety*

Well-being is one of kdc/one's key values, and product safety is an integral part of that. We provide world-class formulation support, unrivaled product and packaging design, and turnkey manufacturing solutions, not only to meet functional and aesthetic requirements, but also comply with stringent safety and quality principles. We always meet or exceed required standards, and pursue the path of continuous innovation through significant and constant investment in research and development.

## 3.3

# Social *Responsibilities*

At kdc/one, we care deeply about people, our local communities and the world. We focus our collective energy and attention on ensuring our communities are supported, uplifted and thriving. This is demonstrated through dedication to, and respect for, human rights. Through our actions and policies, we commit to upholding international guiding principles on ethical business and human rights throughout our relationships with our various stakeholders, with the goal of increasing the enjoyment of human rights within the communities in which we operate.

This includes:

- The prohibition of child labor.
- The prohibition of forced labor.
- The prohibition of illegal, clandestine, or undeclared employment.
- Normalized work hours, wages and benefits.
- Promotion of a healthy work-life balance.

4.

*Compliance  
with This Code  
and Reporting  
Illegal or Unethical  
Behavior*



# Compliance with This Code and Reporting Illegal or Unethical Behavior

All employees, directors and officers are expected to comply with all of the provisions of this Code. The Code will be strictly enforced, and violations will be dealt with immediately, including corrective and/or disciplinary actions such as dismissal or removal from office. Even well-intentioned actions that violate the law or this Code may result in negative consequences for kdc/one and for the individuals involved. Any violation of the Code that involves illegal behavior will be reported to the appropriate authorities.

Situations that may involve a violation of ethics, laws, rules, regulations or this Code may not always be clear and may require keen judgment or decision-making. Employees, officers and directors should promptly report any possible concerns about a violation of ethics, laws, rules, regulations or this Code to the Legal Department or, in the case of accounting, internal accounting controls or auditing matters, to Internal Audit.

Any concerns about a violation of ethics, laws, rules, regulations or this Code by any director, officer or senior executive officer should be reported promptly to the Chief Legal Officer. Any such concerns involving the Chief Legal Officer should be reported directly to the President/CEO. Reporting of such violations may also be done anonymously through the procedure set forth in the [Whistleblower Policy](#) using the Ethics Hotline.

## Concerns *Hotline*

Online

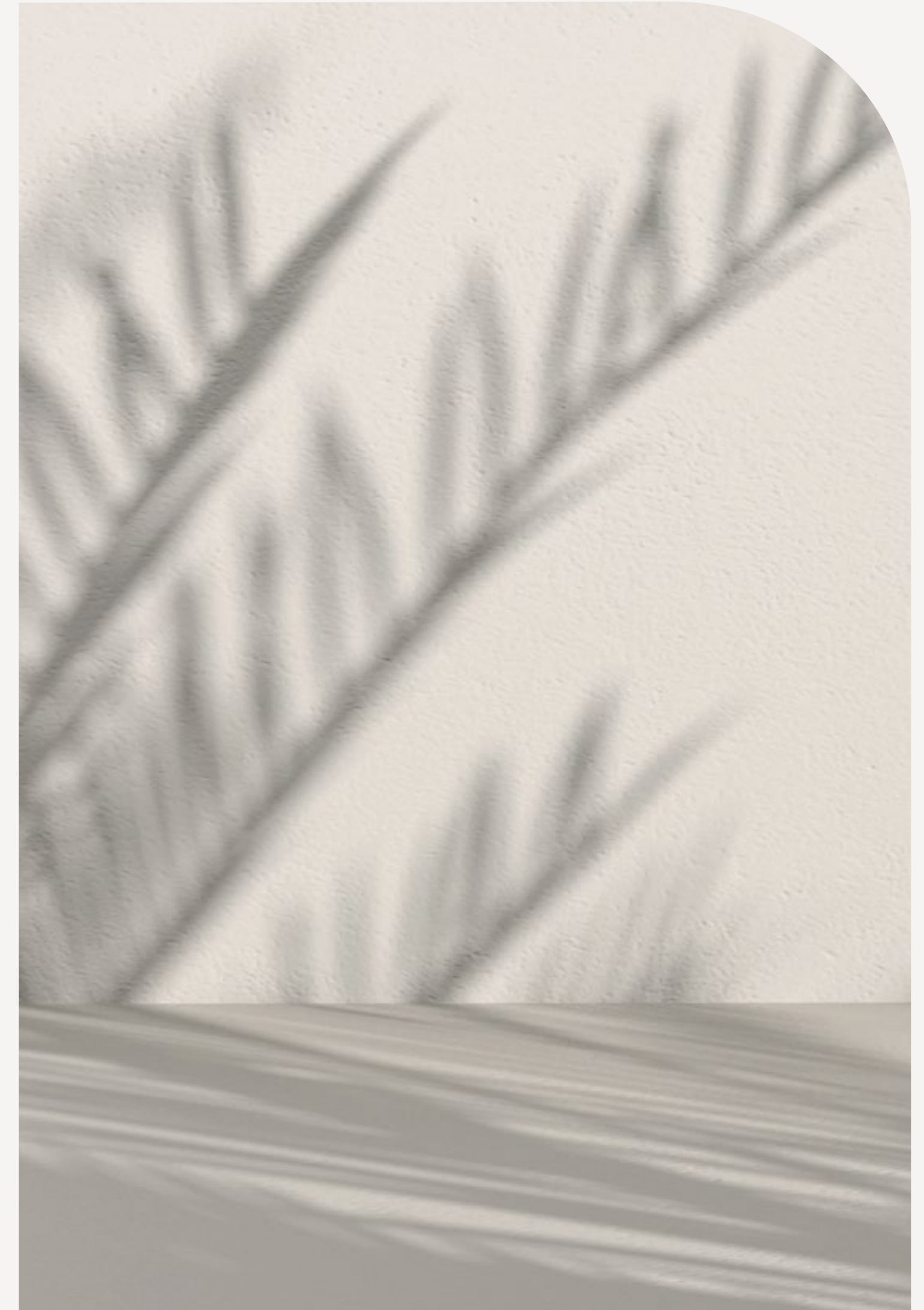
[kdc-companies.ethicspoint.com](http://kdc-companies.ethicspoint.com)

# *Compliance with This Code and Reporting Illegal or Unethical Behavior (cont'd)*

kdc/one encourages all employees, officers, and directors to promptly report any suspected violations and will thoroughly investigate any good faith reports of such violations.

kdc/one will not tolerate any form of retaliation for reports or complaints of misconduct that were made in good faith. Open communication of issues and concerns by all employees without fear of retribution or retaliation is vital to the successful implementation of this Code. All employees, officers and directors are required to cooperate in any internal investigations of misconduct or unethical behavior. kdc/one recognizes the need for this Code to be applied equally to everyone.

kdc/one's Chief Legal Officer will have primary authority and responsibility for enforcing this Code, subject to the oversight of the Board or a committee of the Board, other than in the case of accounting, internal accounting controls or auditing matters where Internal Audit will have prioritization and responsibility subject to the oversight of the Audit Committee of the Board, and kdc/one will devote the necessary resources to establish such procedures as may be reasonably necessary to create a culture of accountability and facilitate compliance with this Code. Questions concerning this Code should be directed to the Human Resources Department at your workplace.



5.

*Reporting  
Violations to  
a Governmental  
Agency*



# Reporting Violations to a Governmental Agency

You have the *right* to:

- Report possible violations of law or regulation that have occurred, are occurring, or are about to occur to any governmental agency or entity, or self-regulatory organization.
- Cooperate voluntarily with, respond to any inquiry from, or provide testimony before any self-regulatory organization or any other regulatory or law enforcement authority.
- Make reports or disclosures to law enforcement or a regulatory authority without prior notice to, or authorization from, kdc/one.
- Respond truthfully to a valid subpoena.

You also have the right to not be retaliated against for reporting, either internally to kdc/one or to any governmental agency or entity or self-regulatory organization, information that you reasonably believe relates to a possible violation of law. It is a violation of applicable laws in the United States and in Canada to retaliate against anyone who has reported such potential misconduct whether internally or to any governmental agency or entity or self-regulatory organization. Retaliatory conduct includes discharge, demotion, suspension, threats, harassment, and any other manner of discrimination in the terms and conditions of employment because of any lawful act you may have performed. It is unlawful for kdc/one to retaliate against you for reporting possible misconduct whether internally or to any governmental agency or entity or self-regulatory organization.

Notwithstanding anything contained in this Code or otherwise, where required by law, you may disclose confidential kdc/one information, including the existence and terms of any confidential agreements between yourself and kdc/one (including employment or severance agreements), to any governmental agency or entity or self-regulatory organization.

kdc/one cannot require you to withdraw reports or filings alleging possible violations of federal, state, provincial, or local law or regulation, and kdc/one may not offer you any kind of inducement, including payment, to do so.

Your rights and remedies as a whistleblower protected under applicable whistleblower laws, including a monetary award, if any, may not be waived by any agreement, policy, form, or condition of employment, including by a predispute arbitration agreement.



6.

*Waivers,  
Amendments and  
Effective Date*

# Waivers, Amendments and Effective Date

Any waiver of the provisions in this Code for executive officers or directors may only be granted by the Board. Any waiver of this Code for other employees may only be granted by the Chief Legal Officer. Amendments to this Code must be approved by the Board. This code is binding for all kdc/one Group employees effective from January 1st, 2024.

*Thank you*