



CODE OF CONDUCT
INTEGRITY IN ACTION

| | | |
|------------|--|-----------|
| 1. | INTRODUCTION | 3 |
| 1.1. | Integrity . . . Words into Action. | 3 |
| 1.2. | How To Benefit From The Code Of Business Conduct. | 3 |
| 1.3. | Making Ethical Decisions. | 3 |
| 2. | GLOBAL ETHICS AND COMPLIANCE POLICY | 4 |
| 2.1. | AmSty Values | 4 |
| 3. | DIVERSITY, EQUAL OPPORTUNITY AND RESPECT IN THE WORKPLACE | 5 |
| 3.1. | Diversity and Equal Opportunity. | 5 |
| 3.2. | Respect and Responsibility | 6 |
| 3.3. | Labor/Human Rights | 7 |
| 3.3.1. | Labor Policy | 7 |
| 3.3.2. | Child Labor Policy. | 7 |
| 4. | ENVIRONMENT, HEALTH & SAFETY | 7 |
| 4.1. | Protection of the Environment | 7 |
| 4.2. | Workplace Health and Safety. | 7 |
| 4.3. | Substance Abuse in the Workplace | 9 |
| 4.4. | Violence in the Workplace | 9 |
| 4.5. | Tenets of Operation | 10 |
| 5. | FINANCIAL INTEGRITY | 11 |
| 5.1. | Books and Records | 11 |
| 5.2. | Questionable Payments | 11 |
| 6. | ACCURATE COMPANY RECORDS | 12 |
| 7. | CONFLICTS OF INTEREST | 13 |
| 7.1. | Outside Interests | 13 |
| 7.2. | Gifts and Entertainment | 15 |
| 8. | FOREIGN CORRUPT PRACTICES ACT | 18 |
| 9. | OBLIGATIONS TO CUSTOMERS, COMPETITORS AND REGULATORS | 18 |
| 9.1. | Competition, Antitrust, Antiboycott and Fair Trade | 18 |
| 9.2. | Gathering Competitive Information. | 19 |
| 10. | EXPORTS AND IMPORTS | 19 |
| 11. | COMPUTER SYSTEMS AND TELECOMMUNICATION SECURITY POLICY | 20 |
| 11.1. | Use of Company Resources | 20 |
| 11.1.1. | Information Systems and Data | 20 |
| 12. | SAFEGUARDING IMPORTANT INFORMATION | 22 |
| 12.1. | Confidential Information | 22 |
| 12.2. | Data Privacy | 22 |
| 12.3. | Inside Information and Trading | 23 |
| 12.4. | Records Management | 24 |
| 13. | INTERACTIONS WITH THE PUBLIC | 24 |
| 13.1. | Charitable Activities. | 24 |
| 13.2. | Political Activities, Political Contributions and Lobbying | 25 |
| 13.3. | Communications With the Public | 26 |
| 14. | CORPORATE SOCIAL RESPONSIBILITY | 26 |
| 15. | REPORTING VIOLATIONS | 26 |
| 16. | NON-RETALIATION POLICY | 27 |
| 17. | AMERICAS STYRENICS ETHICS HOTLINE | 27 |



1. INTRODUCTION

AmSty is committed to conducting business ethically and legally throughout its organization. AmSty people are expected to uphold the highest ethical and business standards no matter where in the business takes them, even if maintaining high ethical standards results in a loss of business. We expect the suppliers and contractors with whom we do business to embrace similar values and standards.

Throughout this document, “AmSty” or the “Company” refers to AmSty LLC and subsidiaries.

All directors, officers and employees are expected to be familiar with the Code and apply it in the daily performance of their responsibilities. The Code is applicable to AmSty non-management directors in their capacities as members of the Board. Employees and officers who violate this Code are subject to disciplinary action up to and including termination of employment and may be subject to civil and/or criminal action. Nothing in this document constitutes a contract of employment with any individual.

In the rare circumstance where a waiver of the Code would be appropriate, such waiver must be approved by the Board of Directors of AmSty or a committee of the Board.

Ethics and integrity questions can be complex. We expect and welcome questions about the Code and its application to your responsibilities. Direct any questions to your supervisor or the other resources noted throughout this Code. Training on the topics covered in this Code is available on the Intranet. Classroom training courses on subjects related to the Code are also available via Human Resources (HR) and from various functions and businesses in the Company. To arrange training on the Code or business ethics topics, contact HR or Legal.

1.1. Integrity . . . Words into Action

At AmSty, we measure success not only by the results we achieve, but how we achieve them. Every decision we make and every action we take must be driven by the highest sense of business and professional integrity.

The purpose of this Code is to inspire you to take integrity beyond words and to ensure you translate it into action. As we face daily and unique business situations, our commitment to integrity requires not only compliance with laws, it also requires that all of us— the employees, officers, and directors of AmSty—act according to the values and beliefs of our Company. As you read this document, you will learn about these values and beliefs and how to make them an active part of your daily work life.

How will this Code benefit you and AmSty? By putting integrity into action every day, we demonstrate respect for the people with whom we interact. The result is a more positive, more trusting work environment, a more unified team, a stronger Company, and ultimately, a Company culture that offers each of us more opportunities to succeed.

1.2. How To Benefit From The Code Of Business Conduct

To make the Code a dynamic and rewarding part of your work:

- Read the entire Code.
- Think about how the Code applies to your job. Consider how you might handle situations to avoid illegal, improper or unethical actions.

Address any questions about the Code to your supervisor, an AmSty lawyer, HR, Legal or the AmSty Ethics Hotline. Information on using the AmSty Ethics Hotline appears on the last page of the Code.

1.3. Making Ethical Decisions

Situations involving questions of ethics and values are often complex and ambiguous. The Code cannot address every workplace situation. Sometimes, a law or policy clearly dictates the outcome. More often, a situation will require interpretation to decide a fair and reasonable course of action.

When faced with a decision, ask yourself these basic questions about the situation:

- What feels right or wrong about the situation or action?
- Is your action plan consistent with AmSty policy and guidelines, applicable law and the Code?
- How might your decision or course of action affect others—customers, suppliers, contractors, partners, competitors, the community, other employees, shareholders, the Company?
- How might your decision or course of action appear to others? An innocent action can result in the appearance of wrongdoing.
- Have you fully explored the consequences of your decision? Would additional advice be helpful? Your supervisor knows you and your job and is usually in the best position to help. If you believe your supervisor is not able to resolve your question or problem, contact HR or Legal.

The Code is supplemented by question-and-answer scenarios to help guide your decision-making and put integrity into action when faced with questionable situations.

2. GLOBAL ETHICS AND COMPLIANCE POLICY

AmSty' policy is to be lawful, highly principled and socially responsible in all of its business practices. AmSty expects each employee to learn and comply with all Company policies and laws applicable to their job and to adhere to the guiding principles outlined in the Code.

2.1. AmSty Values

AmSty' Values are the foundation of the Code. Each Value is an integral part of AmSty' standard of ethical practices and should influence every action we take. The Values are summarized below.

PROTECTING PEOPLE AND THE ENVIRONMENT

The health and safety of our employees and the protection of our communities are our highest priority. We deliver world-class performance through disciplined application of our Operating Discipline Management System.

RESPECT FOR PEOPLE

Our success depends upon the commitment, capabilities and diversity of our employees. We value the uniqueness of individuals and the varied perspectives and talents they provide. Respect for people is measured by how we treat each other, by the contributions that flow from our diversity and by the productivity of our relationships. We strive to be an employer of choice.

INTEGRITY

We conduct ourselves with honesty and integrity in all that we do. We meet the highest ethical standards in all business dealings, regardless of where we operate. We are accountable for our actions.

TEAMWORK

We are one team. We will work together, building relationships to create ever-greater value for the customers that we serve. Our "can do" spirit delivers top performance.

VALUE CREATION

We are committed to excellence in everything we do. We are results-driven and will create value through continuous improvement.



3. DIVERSITY, EQUAL OPPORTUNITY AND RESPECT IN THE WORKPLACE

OUR COMPANY IS A PLACE WHERE INDIVIDUALITY IS RESPECTED AND WHERE PEOPLE CAN PERFORM TO THEIR HIGHEST POTENTIAL.

3.1. Diversity and Equal Opportunity

At AmSty, we recognize, value and leverage our differences for competitive advantage. It is a key to our success.

We encourage a culture of mutual respect in which everyone understands and values the similarities and differences among our employees, customers, communities and other stakeholders. We work to provide an atmosphere that encourages positive interaction and creativity among all employees.

AmSty attracts and hires talented and motivated people who wish to excel. We provide equal access for people who are willing to compete and equal employment opportunity to all employees regardless of age, race, color, national origin, sexual orientation, gender, disability or religion.

INTEGRITY IN BRIEF..

Discriminatory practices or factors that are not job-related should never be the basis for employment, promotion and compensation decisions.

INTEGRITY IN ACTION... DIVERSITY AND EQUAL OPPORTUNITY

A co-worker made degrading remarks about other employees. Some of my co-workers have complained to me about this person. How can we make the person stop?

Consider talking to the co-worker to let the person know the remarks are contrary to our culture of mutual respect and inclusion. If the situation does not improve, you should contact your supervisor, HR or the AmSty Ethics Hotline. You should also encourage individuals, who experience what they consider degrading or offensive remarks or behavior, to contact their supervisor, HR or the AmSty Ethics Hotline.

I want to apply for a job opening in another part of AmSty. I have the skills and experience, but someone told me the job would go to a younger person whom the hiring supervisor knows. Should I apply?

The only way the hiring supervisor will know you are interested in the job is if you apply. The job should go to the person with the best qualifications and experience, regardless of age or other factors that are not job related.

I've been assigned to a project with a co-worker with whom I've disagreed in the past. Can I refuse to work with her?

You don't have to agree with or like all co-workers, but you are expected to recognize and respect individual differences and create an inclusive

environment in which you can both perform your job responsibilities. Ask your supervisor or HR representative to suggest some ideas for improving communication and minimizing personality conflicts with your co-worker.

I have a problem that I want to take to HR, but my supervisor wants us to talk to him first before going to HR. Maybe he just wants a chance to resolve the problem himself, but sometimes I think he doesn't want HR to know about our internal problems. What can I do?

Any employee may contact HR for any reason, with or without a supervisor's permission. However, it's often a good idea to try to work out a problem with your supervisor and within the work group before going to another resource such as HR. If you think your supervisor will treat you or the situation fairly, start by talking with him or her. But if you are uncomfortable raising an issue with your supervisor, contact HR.

3.2. Respect and Responsibility

It is AmSty' policy to provide all employees with an environment of mutual respect that is free from any form of harassment and discrimination. Harassment and discrimination of any form is not acceptable and will not be tolerated.

It is never acceptable to make statements or engage in conduct that is degrading, offensive, humiliating or intimidating. Even small, apparently innocent actions can create an environment that may be offensive to others.

Sexual harassment is the most common form of harassment and violates AmSty' Code of Business Conduct. It can include: unwelcome sexual advances, requests for sexual favors, unsolicited physical contact, propositions, unwelcome flirtations, or offensive verbal, visual or physical conduct of a sexual nature. Examples may include suggestive or lewd remarks, unwanted hugs, touches, or kisses. It can also include graphic or visual displays such as posters, pin-ups, or electronic pictures, video clips, or e-mail messages.

Actions or behaviors that violate AmSty' Code of Business Conduct are not always overt or deliberate. In some cases, harassment and discrimination can be subtle and difficult to identify. Be alert to your own behavior. Understand that certain, apparently harmless, actions may still have a negative impact on other individuals and on the overall atmosphere at AmSty.

If you believe you are being treated in a discriminatory fashion or in any other way that violates AmSty' Respect and Responsibility policy, promptly inform your supervisor or HR or call the AmSty Ethics Hotline. All reports are taken seriously. Retaliation against an individual for making a report in good faith about these matters will not be tolerated. See the Non-retaliation policy on the last page of the Code.

INTEGRITY IN ACTION...RESPECT AND RESPONSIBILITY

Someone put a joke on the bulletin board in the break room. My co-workers and I found it offensive, but when we complained to our supervisor she said we were "too sensitive." What can we do?

Your supervisor was wrong to ignore the complaint. Report the incident to your HR representative, another AmSty manager, or call the AmSty Ethics Hotline, anonymously if you prefer.

I just learned my co-worker has accused me of sexual harassment and violating AmSty' Respect and Responsibility policy. What's going to happen to me?

AmSty takes this kind of report seriously. You will be interviewed and given an opportunity to describe what happened. The outcome will depend on a number of factors, including the specific facts, seriousness of the conduct, past warnings and the credibility of those involved.

I've just received an e-mail message that contains a sexually degrading picture that I find offensive. What should I do?

First, you should report the incident to your supervisor, Information Systems Security, HR or the AmSty Ethics Hotline. Then, delete the message. Consider responding to the individual, stating that his or her message is contrary to AmSty' Respect and Responsibility Policy, that you find it offensive, and that you do not want to receive any messages of this kind in the future. If you receive further similar messages, or if you do not feel comfortable responding directly to this individual, you should report the incident to your supervisor, Information Systems Security, HR or the AmSty Ethics Hotline.



3.3. Labor/Human Rights

3.3.1. Labor Policy

AmSty believes that respect for the dignity, rights and ambitions of all people is a cornerstone of business excellence in the 21st century. This policy extends to every AmSty employee and to all people who work at any of AmSty' facilities. We expect the suppliers and contractors with whom we do business to embrace similar values and standards.

AmSty recognizes and respects all labor and employment laws -- including those respecting freedom of association, privacy and equal employment opportunity -- wherever it operates. AmSty believes that working positively and directly with employees best serves their interests. AmSty also strives to work cooperatively with duly chosen employee representatives in the common pursuit of the interests of the employees and the Company's mission.

3.3.2. Child Labor Policy

AmSty complies with all child labor laws. We understand that children may legitimately perform tasks that do not interfere with their education and do not negatively affect their health, safety and development. AmSty seeks to have a positive impact on the reduction of unlawful child labor and child exploitation. AmSty expects the suppliers and contractors with whom we do business to embrace similar values and standards.

4. ENVIRONMENT, HEALTH & SAFETY

AmSty strives for zero harm to people and the environment.

4.1. Protection of the Environment

Protecting people and the environment is key to our commitment to AmSty' Values. It is part of everything we do and every decision we make. Each employee and officer is responsible to ensure that our products and operations meet applicable government and AmSty' standards, whichever is more stringent.

AmSty' "Vision of Zero" goal drives all of our Environment, Health and Safety (EH&S) activities. AmSty' goal is to eliminate all injuries and illnesses, prevent adverse environmental impacts, reduce wastes and emissions, and promote resource conservation at every stage of the life cycle of our products.

AmSty expects all employees to be familiar with environmental, health and safety laws, and AmSty' policies applicable to their area of business. The laws are complex, subject to frequent changes and vary from country to country. Seek advice from your AmSty lawyer or EH&S subject matter expert to clarify how these laws apply to your job.

4.2. Workplace Health and Safety

AmSty' health and safety rules and procedures are designed to provide a safe and healthy work environment and meet applicable health and safety laws. Maintaining a safe and healthy work environment relies heavily on the choices and behavior of individuals. Each of us must be aware of the rules and procedures that apply to our workplace, diligently follow the rules, and encourage others to do the same. Immediately report any unsafe situations or acts to your supervisor, HR or site EH&S leader.

INTEGRITY IN BRIEF...

If you observe an unsafe or potentially hazardous condition, report it immediately to your supervisor, HR or site EH&S leader.

INTEGRITY IN ACTION...ENVIRONMENT, HEALTH & SAFETY

I thought I saw a co-worker change environmental monitoring records that might hide potential violations of our environmental discharge permit. What should I do?

Immediately notify your supervisor, the site EH&S leader, or the AmSty Ethics Hotline and provide the details of what you observed.

A supplier told me that a material that AmSty has been importing for years into the U.S. has a different identity than what we believed, and it may not be on the U.S. Toxic Substances Control Act (TSCA) Inventory. That means all those imports may have violated regulatory requirements. What should I do?

This is an example of a complex environmental requirement. Experts are needed to determine compliance or non-compliance. Immediately notify the subject-matter expert in EH&S and an AmSty lawyer. Prompt investigation is important, so don't delay.

Environmental protection laws can be complicated; sometimes it's difficult to know when to be concerned about a particular situation. What do I need to remember?

The laws are complex, but you don't need to understand every detail before you report an environmental concern. If you are unsure, ask!

My supervisor asked me to skip some required quality checks in order to make a production deadline. What should I do?

Do not skip the quality checks. No matter who asks you to do something, if you know it is wrong, do not do it. If you are uncomfortable talking to your supervisor about the situation, contact your supervisor's manager or your site EH&S leader.

I know we are supposed to report injuries, job-related illnesses and accidents, but sometimes I think my symptoms are too minor to report. Is reporting really important?

Information can be vital to prevention. Reporting accidents, as well as any job-related illness or symptom, can help determine the steps necessary to prevent future problems or accidents. Report all near-misses, job-related illnesses and accidents to your supervisor.

I know we are supposed to report injuries, job-related illnesses and accidents, but my performance award (or my supervisor's) depends on our incident rate going down. What does AmSty really want?

AmSty' goal is to eliminate injuries, illnesses and accidents. The problem here is the apparent conflict between the financial incentive and the requirement to report all job-related illnesses and accidents. Business or personal goals should not be designed to compromise reporting and employee safety, which are our highest priorities.

4.3. Substance Abuse in the Workplace

AmSty is committed to a working environment free of substance abuse. Such an environment safeguards the health, safety and security of our employees, our operations and all people who come into contact with our workplaces and property. Substance abuse negatively affects productivity, attendance and on-the-job safety. The unlawful use, possession, sale, conveyance, distribution, concealment, transportation or manufacture of illegal drugs, intoxicants, controlled substances or drug paraphernalia on AmSty premises, in AmSty vehicles, or while conducting AmSty business off Company premises is prohibited.

An employee who reports to work under the influence of, or is unfit to work because of, the effects of alcohol or drugs is subject to disciplinary action, up to and including termination from employment consistent with the requirements of local law. AmSty reserves the right to search items on Company property, including but not limited to offices, desks, computers, cars, and lockers at any time, to the full extent permitted by local law.

4.4. Violence in the Workplace

To preserve employee safety and security, weapons, firearms, ammunition, explosives and incendiary devices are forbidden on Company premises or in Company vehicles. In addition, AmSty will not tolerate acts or threats of violence, including extreme or inappropriate verbal or physical threats, intimidation, harassment and/or coercion. Behavior that threatens the safety of people or property, or has the potential to become violent, should be immediately reported to your supervisor, HR, or the AmSty Ethics Hotline.

INTEGRITY IN BRIEF...

Each of us has a responsibility to work without impairment by alcohol or other substances. Be aware of verbal or erratic, abusive, or hostile behavior that has the potential to become more serious.

INTEGRITY IN ACTION...SUBSTANCE ABUSE AND VIOLENCE IN THE WORKPLACE

I just came back from lunch and noticed that my co-worker looks like he is under the influence of alcohol or drugs. What should I do?

Take a moment to observe the actions and behaviors of your co-worker that are causing you concern, so that you can describe the situation. Next, immediately notify the nearest supervisor, HR or Security and inform them of your concern and the specific observed behaviors and actions that caused you to bring the matter to attention. While it may be that the individual is suffering from an illness rather than alcohol or drugs, your supervisor or HR should be notified.

Does this policy apply whenever I'm on Company premises? For example if I'm not formally scheduled to be at work but come in to do some work after hours, attend a special meeting or take care of some administrative actions required of me, does the policy still apply?

Yes. The primary purpose of this policy is to contribute to creating a safe work environment at all times. Impairment can lead to a safety incident at any time, not just when one is formally scheduled to be at work.

What if I'm not on call but am asked to come in to work for an emergency or for some other urgent reason and I've just returned from a party where I had been drinking?

The policy applies and you should inform the person making the request of the situation. The spirit and intent of the Substance Abuse policy is to keep AmSty' people and facilities safe. If your judgment or physical abilities are impaired, it is not safe to drive in an AmSty plant, work in a safety sensitive area or make important decisions and you should not do so.

What should I do if I see a potentially violent situation developing?

If you see or hear any act that is threatening, or carries the potential for violence, call your supervisor or HR. Act immediately!

I overheard a co-worker threaten another employee. The other employee was upset but was afraid to report the incident. Should I report it?

Tell your supervisor about the incident immediately. AmSty investigates all reported acts or threats of violence.



4.5. Tenets of Operation

AmSty' Tenets of Operation are an extension of the Company's values and principles that apply to all employees (both company employees and contractors). The Tenets of Operation are part of our Code of Business Conduct that affect all daily decisions and "hands on" activities, including any ambiguous situations that arise. Any deviation from "always" and "never" in the Tenets of Operation requires immediate action to counteract associated risks.

The Tenets of Operation are intended to protect people, the environment, and business assets based on three common sense principles:

TENETS OF OPERATION

1. Never operate equipment outside of design or environmental limits.
2. Always move to a safe, controlled condition and seek assistance when a situation is not understood.
3. Always operate with safety and environmental protection devices enabled.
4. Always follow all safe/environmental work practices/procedures and act to stop unsafe conditions/actions immediately.
5. Always produce a product that meets or exceeds your customers' requirements.
6. Never contaminate or compromise a dedicated system.
7. Always report environmental/safety compliance information accurately and on time.
8. Always address abnormal conditions and clarify/understand procedures before proceeding.
9. Always develop and follow written procedures for high-risk or unusual situations.
10. Always involve people with expertise and first-hand knowledge in decisions, improvements and changes that affect procedures and equipment.

THE TENETS OF OPERATIONS ARE BASED ON THREE PRINCIPLES:

- 1. Work Safely Or Not At All**
- 2. There Is Always Time To Do It Right**
- 3. If It's Worth Doing, Do It Better**

5. FINANCIAL INTEGRITY

We are committed to financial integrity for the benefit of our stakeholders.

The Company relies on accounting records to produce reports for the Board of Directors, management, creditors, governmental agencies and others. All Company accounting records and reports produced from those records, must be kept and presented according to the laws of each applicable jurisdiction. Moreover, the records must accurately and fairly reflect the Company's assets, liabilities, revenues and expenses. All actions and commitments must be taken according to the Authorization Policy and written delegations of authority.

5.1. Books and Records

Each AmSty employee and officer must ensure that no false or intentionally misleading entries are made in the Company's accounting records. Intentional misclassification of transactions regarding accounts, departments, or accounting periods violate the law and the Code. All transactions must be supported by accurate documentation in reasonable detail, recorded in the proper account and in the proper accounting period.

If any employee, officer or director of AmSty has concerns or complaints regarding questionable accounting, auditing or other financial records, he or she is expected to report those concerns to the Legal Department or to the AmSty Ethics Hotline. Issues may also be reported to the CFO or CEO directly as needed.

All employees are expected to demonstrate financial integrity in processing Travel and Expense Reports and other financial transactions. Cash or other assets must not be maintained in any unrecorded or "off-the-books" fund for any purpose. Compliance with Generally Accepted Accounting Principles (GAAP) and the Company's system of internal controls is required at all times. Proper justification is required when alternative accounting treatment is possible under GAAP.

Please also refer to all applicable financial policies/procedures as issued by the CFO.

5.2. Questionable Payments

It is against AmSty' policy to make unlawful, improper or other kinds of questionable payments to customers, government employees or officials, or other parties. We do business and sell our products on the merits of price, quality and service.

We will not offer expensive gifts, bribes or any other kind of payment or benefit to representatives of customers, suppliers, competitors, government or governmental agencies. This applies to any individual or organization at any level, within or outside of the U.S. We expect our employees to refuse to make questionable payments. In cases where the propriety of a payment is not clear, or the alternatives might be harmful to the Company or employee, the matter should be approved in advance by an AmSty lawyer and executive business management. Our policy on questionable payments includes not only direct actions of AmSty employees, but also forbids indirect actions by agents, distributors, representatives, joint venture partners, or third parties acting on AmSty' behalf. Ignoring activity that appears to be questionable is also a violation of AmSty' policy and, in some cases, the law.

INTEGRITY IN BRIEF...

You must report any and all questionable payments to management, Legal or the AmSty Ethics Hotline.

INTEGRITY IN ACTION...FINANCIAL INTEGRITY

After moving to a new group, I learned that payments are recorded as business advertising or market survey expense when it is actually spent for entertainment purposes. Since the amount spent is booked accurately, is there a problem if the category really isn't correct?

Yes, it could be a serious problem. Various laws require that books, records and accounts must be kept in reasonable detail that accurately and fairly reflect the transactions of the Company. Slush funds, off-book accounts, falsified transactions and misrepresentations of expenses violate the Code, and in many instances, the law.

A person in my group is committing to spend \$30,000 for goods or services in the next year. Since his spending authority is \$20,000, he asked me to issue two purchase orders instead of one so that he can avoid asking for higher level approval. What should I do?

Report the matter to your supervisor, Legal, or the AmSty Ethics Hotline. The individual is trying to avoid the Authorization Policy and his actions are an attempt to get around the internal accounting controls.





6. ACCURATE COMPANY RECORDS

Laws and regulations require AmSty' records to accurately reflect the events they represent. Falsifying business records is a serious offense that may result in criminal prosecution, civil action and/or disciplinary action up to and including termination of employment. Always record data in a timely and accurate manner. This protects AmSty' resources and meets the expectations of people who rely on the accuracy of our records to perform their jobs.

If any individual has concerns or complaints regarding the accuracy of financial, EH&S, analytical, engineering, intellectual property, or any other Company records, he or she is expected to raise those concerns with supervision or another appropriate channel including the AmSty Ethics Hotline.

INTEGRITY IN BRIEF...

Company records include individual expense reports, time sheets, medical claim forms and personnel reviews, as well as financial, EH&S, analytical, engineering and business reports. The integrity of AmSty' records depends on the integrity of the reporting of each transaction.

INTEGRITY IN ACTION...ACCURATE COMPANY RECORDS

I ordered some software and my supervisor is asking me to record the charge against another expense category because our budget for software has been exceeded. What should I do?

Remind your supervisor that no one should knowingly make an incorrect record in the books and records of our Company. If your supervisor persists, contact your supervisor's supervisor or the Legal Department.

I want to join a professional organization, but my supervisor told me that AmSty won't pay the dues. I really think the organization will help me in my job, so I plan to pay the dues myself and submit an expense report for something else to recover my money. Is this okay?

Submitting a false expense report is wrong, no matter what the circumstances. Try again to explain the benefits of joining this group. If the answer is still no, you need to decide if the personal benefits of joining the group warrant your paying the dues yourself without reimbursement from the Company.

My team is under a deadline to complete an analytical report. Since we think we know how the data will turn out, how bad would it be if we wrote the report without actually completing the analysis?

Falsification of data is extremely serious. Misconduct or fraud damages the reputation of the individuals involved and of AmSty, and may lead to civil or criminal penalties and/or disciplinary action including loss of employment. Allegations of misconduct or fraud should be brought to the attention of your supervisor or the AmSty Ethics Hotline.

7. CONFLICTS OF INTEREST

Integrity demands that we safeguard our reputation by avoiding conflicts, or even the appearance of conflict.

Conflicts of interest are in clear opposition to AmSty' Integrity Value and the Code. Each employee, officer, and director is expected to act in the best interests of the Company and to protect AmSty' reputation from any conflicts. We should also be sensitive to even the appearance of a conflict. This means that employees, officers, and directors should avoid any investment, interest, association or activity that may cause others to doubt their or the Company's fairness or integrity or that may interfere with their ability to perform job duties objectively and effectively. Many potential conflicts of interest can be prevented or remedied by making full disclosure of the situation to your supervisor or functional leader. AmSty' supervisors and leaders are responsible to ensure that AmSty' interests are protected from conflicts of interest.

What are some activities that could represent conflicts of interest?

- Having stock or other ownership or financial interest in a company doing business with AmSty
- Serving as a board member of an entity with which AmSty does business
- Holding a second job that interferes with your ability to do your regular job
- Hiring a supplier, distributor or other agent managed or owned by a relative or close friend

7.1. Outside Interests

If you, a member of your family, or close friend have a financial or other interest in a customer, competitor, or supplier's firm, that interest can impact your ability to make impartial decisions on behalf of AmSty. Employees, officers and directors are prohibited from personally taking an opportunity for business or profit that belongs to AmSty or competing with the Company in any way. You must disclose any actual or potential conflicting interests of this nature to your supervisor, or in the case of directors to the Board of Directors of AmSty or a committee of the Board.

INTEGRITY IN BRIEF..

Outside interests and activities, whether financial, business, or community-focused, should not affect your job performance or loyalty or jeopardize AmSty' reputation.

INTEGRITY IN ACTION...CONFLICTS OF INTEREST

I want to invest in a company that is a supplier to AmSty. Is this a conflict of interest?

It might be. The answer depends on factors such as your position at AmSty, whether you have any inside information about the company, your influence

on purchasing decisions with that company, and the amount of your investment. Small investments in publicly traded companies are usually not a problem. Talk with your supervisor, an AmSty lawyer or the Legal Department.

A long-time friend recently took a job with a Company supplier. We've socialized for a number of years, but now I wonder if our friendship poses a business ethics problem.

It might. If you play a role in specifying selection of your friend's employer as a supplier, or if you have to deal with the individual on behalf of AmSty, you should disclose your friendship to management and excuse yourself from participating in decisions or negotiations with your friend and the supplier.

A family member operates an office supply business, and I assist with its operation during non-AmSty business hours. Is this a problem?

This is not a conflict of interest if the family member's business does not sell supplies to AmSty and you are not assisting with its operation during your AmSty working hours. If there is a possibility that AmSty may become a customer of the family member's business, you should inform your supervisor of your relationship.

I've discovered that an AmSty supplier paid for a co-worker's recent business trip. Isn't this a conflict of interest? What should I do?

This situation could present a problem under AmSty' policy, because it creates an appearance of preferential treatment and may influence the business relationship by what the supplier may expect to gain. Employees are expected to discuss situations where a conflict exists — or appears to exist — with their supervisor prior to accepting an offer. In this situation you should report your co-worker's actions to your supervisor or the AmSty Ethics Hotline.

I am negotiating a business arrangement for AmSty with another company that has offered me the opportunity to purchase newly issued stock in that company. Can I participate?

Employees should not accept incentives, compensation or other benefits from third parties as a result of an ongoing or potential business relationship between the third party and any AmSty entity without the knowledge and approval of management. The employee must disclose the offer to his or her supervisor so the potential conflict can be reviewed with senior AmSty management. Any acceptance of such an offer by an individual must be approved in writing by the Chief Financial Officer of AmSty. If the other company offers the stock to AmSty, Board approval is required.

I have a relative who I'd like to contract to do some work at AmSty. Since this is a legitimate project that needs to be done, and my relative is trained to do this type of work, is this okay?

Although the work is legitimate, this situation creates the appearance of a conflict. The circumstances of this situation should be raised with supervision so that an independent review can be done prior to committing to a contract.

A company with which AmSty does business is offering AmSty people the opportunity to purchase that company's consumer goods at a discount. Can we participate?

The discount is a form of incentive, compensation or gift that could create a conflict of interest. Employees should not accept incentives, compensation or other benefits from third parties as a result of an ongoing or potential business relationship between the third party and any AmSty entity without the knowledge and approval of management. The employee must disclose the offer to his or her supervisor so the potential conflict can be reviewed. While employees obtaining consumer goods at a discounted price has little if any business benefit to AmSty, the Company's response to any specific situation would depend on whether Company time and resources would be used in accepting the offer, whether the offer is generally available to the AmSty population or only a select group of employees and similar considerations. Certainly, individual employees should not profit from the situation and there should be little use of Company time or resources to implement.

7.2. Gifts and Entertainment

AmSty selects products and services on the basis of price, quality and service. We expect our customers to purchase our products and services on the same basis. All business transactions should be impartial, objective and free of outside influence.

Modest gifts, favors and entertainment are often used to strengthen business relationships. However, no gift, favor or entertainment should be accepted or given if it obligates, or appears to obligate, the recipient, or if it might be perceived as an attempt to influence fair judgment. In general, unless you have supervisory approval you should not provide any gift or entertainment to customers, suppliers or others that you would not be able to accept from a customer, supplier or others.

Never give or accept cash or its equivalent in connection with a business transaction. Never promise or make loans or investments of any kind without first fully complying with the Authorization Policy and applicable record keeping requirements.

No employee, officer, director, family member, agent or agent's family member should offer, accept or receive a gift or entertainment if it:

- Is in cash
- Is not consistent with customary business practices
- Is extravagant in value

- Can be construed as a kickback, bribe or payoff in violation of any law, including a bribe to a government official in violation of the U.S. Foreign Corrupt Practices Act
- Violates any other laws or regulations, or
- Could cause embarrassment to or discredit the Company if disclosed.

Specific laws apply to interactions with government officials and employees. For example, the U.S. and other countries have strict laws that prevent providing anything, including food or beverages, to a government employee. When doing business with government agents, employees or officials, be sure you understand applicable laws as well as local customs and norms. Please discuss with your supervisor or the Legal Department, any gifts or proposed gifts that you are not certain are appropriate.

INTEGRITY IN BRIEF..

Gifts and entertainment should never influence, or give the appearance of influencing, your ability to make impartial business decisions in the best interests of AmSty.



INTEGRITY IN ACTION...GIFTS AND ENTERTAINMENT

A supplier recently offered me the use of his condo in the mountains for the weekend. He says he owns the place and it costs him nothing to let me stay there. Can I go?

No. This offer is very valuable, even though the supplier is not paying directly for your stay. Accepting this offer violates AmSty policy on accepting gifts since it is of significant value and is not something the Company would reciprocate for the supplier.

A customer with whom I do business visits our facility occasionally. May I buy her lunch?

Yes, so long as this does not violate any of her employer's guidelines and the meal expenditure is reasonable considering the business relationship involved. If you are in doubt ask, "Is it okay with your company if I buy you lunch?"

May I accept a business meal from a supplier representative?

In most circumstances, modest and infrequent business meals may be accepted. However, whenever a supplier pays for a meal, always consider the specific circumstances and whether your impartiality could be compromised or appear to others to be compromised. Talk with your supervisor if you are unsure.

May I accept travel expenses to speak at a supplier's conference or a professional meeting?

Normally, it is not appropriate for suppliers to pay for your expenses to speak at conferences. On the other hand, you can be reimbursed for expenses from associations and professional groups because such organizations are not suppliers who might be using the speaking invitations to secure favorable treatment or to create the appearance that AmSty endorses their product.

I am responsible for organizing various AmSty meetings, including the selection and bookings of hotel reservations. Is it okay to accept the hotel manager's offer for a complimentary room for my personal use, since we are giving so much AmSty business to the hotel?

Accepting the offer could affect, or give an appearance of affecting, your impartiality in arranging hotel accommodations for that meeting or for future meetings. It is a clear violation of AmSty policy if you request, or imply that you would like, a complimentary room or other gift for personal use during negotiations for the AmSty rooms. However, if the hotel offers a reasonable value room to all meeting organizers who meet predetermined booking criteria, then decision criteria include whether the complimentary room could be used by the Company and whether there is an appearance that the individual is acting for personal gain. As with all matters involving a valuable gift or potential conflict of interest, employees should discuss the situation with their supervisor before accepting such offers. Each employee is expected to act, and make impartial decisions, in the best interests of the Company.

I attended a seminar at the Company's expense and won a prize worth \$100. Three hundred people attended and only four prizes were available. May I keep it?

The random selection of the prize winner helps avoid any appearance that your business decisions may be influenced, so it is probably acceptable to keep the prize. However, consult with your supervisor.

I would like to take a customer representative to the World Cup or another major sporting event. Is this acceptable?

The answer to the question depends on whether the entertainment is reasonable and not extravagant under the circumstances. What constitutes extravagant in a particular case will be determined not only by the details and monetary value of the gift or entertainment, but also by the nature of the business relationship, your respective roles in that relationship and whether there is a valid business purpose. If you would feel uncomfortable accepting the entertainment if the roles were reversed, that is a good indication that the situation should be discussed with your supervisor.

I received an expensive basket of fruit from a supplier as a holiday present. I did not solicit the gift. What should I do?

Inform your supervisor that the gift was received. Where it is impractical to return the gift, it should be treated as property of the Company. In the case of a gift of food, an appropriate use would be sharing it with others in the work area, or it can be given to a charitable organization.

Is it acceptable to provide adult entertainment or sexual favors to AmSty customers or suppliers, or to accept such entertainment from others, at "gentlemen's clubs" or "strip clubs" or similar places?

No. That is not the type of activity the Company wants to be associated with. It is viewed by many as contrary to our Respect for People Value and could cause embarrassment to or discredit the Company. An employee's conduct when on Company business should reflect the image AmSty articulates in its Values and the Code.

May we give a gift to a contractor employee as part of a team award as a thank you for a job well done?

This can present a problem under local law. You should consult with your supervisor and AmSty lawyer. In the U.S. giving gifts directly to contractor employees does not respect the fact that another company, other than AmSty, is that individual's employer. If you would like to see a contractor employee recognized, contact the individual's employer and request that the contracting entity give recognition and/or a gift to its employee.

While traveling on AmSty business, I am the houseguest of another AmSty employee, a friend or family. May I purchase a gift in lieu of lodging expense?

Yes, as long as it is reasonable and the expense report clearly notes that it is a gift in lieu of lodging.

I travel frequently for AmSty. Some airlines and hotels have frequent traveler programs based on the amount of usage or method of purchase. Is it okay to accept the travel awards for personal use?

Many suppliers in the travel industry sponsor award programs that are available to all travelers on consistent terms. Executive management decided years ago that employees could use travel awards earned on Company business for personal use. The Company expects all business travel to occur according to Company travel guidelines and that travel decisions are not influenced by the number of frequent flier miles or hotel points obtained. Travel planned to increase award incentives for the individual likely creates a conflict of interest and violates AmSty policy.

8. FOREIGN CORRUPT PRACTICES ACT

In the course of business, AmSty employees may come into contact with government officials. The Foreign Corrupt Practices Act (FCPA), a U.S. law, prohibits AmSty employees and agents from directly or indirectly offering or promising to pay, or authorizing the payment of money or anything of value to government officials outside the U.S., for the purpose of influencing the acts or decisions of those officials. Other countries have passed similar legislation prohibiting bribery by citizens of those countries of government officials in other countries. AmSty employees shall comply with the FCPA and similar anti-bribery laws.

Facilitating payments shall not be made without the prior approval of the General Counsel unless there is an emergency situation and such payments are allowed under local and US law.

No payments, gifts, services, or any other item of value may be offered or given to any government official, anywhere in the world, if that payment, gift, service, or item is intended to or could even have the appearance of being intended to influence the actions of a government official to win or retain business for AmSty.



9. OBLIGATIONS TO CUSTOMERS, COMPETITORS AND REGULATORS

Competition is fundamental to our success—but never at the expense of acting ethically and lawfully.

AmSty' responsibility to conduct its business ethically extends to its customers, suppliers, and competitors.

9.1. Competition, Antitrust, Antiboycott and Fair Trade

AmSty is committed to free, fair and open business competition, and is equally committed to competing ethically and in compliance with laws that foster competition in the marketplace. AmSty advertises, promotes and labels its products and services in a factual, honest and informative way.

The U.S. and many other countries have antitrust and trade laws and regulations that demand free and fair competition. These laws must be obeyed. AmSty' employees, officers, or directors will not have discussions or reach agreements, whether formal or informal, written or unwritten, with competitors, or others, which can restrict free and open competition. This includes discussing or making agreements with competitors about: prices or credit terms; submission of bids or offers; allocation of markets or customers; restrictions on production or distribution; or boycotts of suppliers or customers. Antitrust offenses do not have to involve anything in writing. Even the appearance of an understanding with a competitor may bring serious penalties.

Violations of antitrust laws, either deliberate or accidental, expose AmSty and individual employees, officers and directors to serious civil or criminal penalties or lawsuits. If any issues arise concerning antitrust compliance, immediately speak to your supervisor, or the Legal Department.

AmSty must comply with all applicable trade restrictions and boycotts imposed by the U.S. government. Such restrictions prohibit AmSty from engaging in certain business activities in specified countries and with specified individuals and entities. These restrictions include, for example, prohibitions on interaction with identified terrorist organizations or narcotics traffickers. Sanctions for non-compliance can be severe, including fines and imprisonment for responsible individuals, and AmSty may be prohibited from further participation in certain trade.

AmSty must also comply with U.S. anti-boycott laws that prohibit companies from participating in any international boycott not sanctioned by the U.S. government. The U.S. has forbidden most actions by U.S. companies (including non-U.S. subsidiaries and controlled affiliates) and their employees that further boycotts that are not sanctioned by the U.S.

For any questions regarding trade restrictions, please consult the Legal Department.

9.2. Gathering Competitive Information

To obtain competitive information about products, services, and prices, AmSty uses publicly available information including published articles, market analyses, and reports. Employees, officers or directors should not seek a competitor's confidential information, or accept anyone's confidential information, without the owner's consent. In no case will AmSty use illegal (theft, bribery, misrepresentation or espionage through electronic devices) or unethical business means to obtain competitive information.

Since the guidelines cannot cover every situation and since laws vary by jurisdiction, consult an AmSty lawyer if you have any questions. Company guidelines for gathering competitive information are available to employees on the Intranet.

INTEGRITY IN ACTION...COMPETITION & ANTITRUST

A friend gave me some non-public information about an AmSty competitor. I didn't ask for it, but now that I have it, what should I do?

Do not study or make copies of the material. No matter where the information came from – a friend, co-worker, vendor, customer or other person – contact your supervisor, or the Legal Department and forward the information to them. Legal will provide further guidance on how to respond. If you receive this type of information verbally, even from a customer, tell the person that the discussion violates AmSty policy and must stop immediately.

A competitor has been making false and misleading statements in the marketplace about AmSty products and services. Should we respond?

Since it is against our Code to make false or misleading statements, we will not respond in kind. Continue to emphasize the positive aspects of our products and services and respond only with facts and references. Advise your business leader of the incident. Contact your AmSty lawyer to assess whether the competitor's tactic is in compliance with applicable law.

At a professional association meeting a few members informally discussed a plan to divide their sales territories to reduce competition. I declined to join them, but what should I do if this happens again?

Such a conversation likely would be an antitrust violation. If this happens immediately, excuse yourself from the meeting and state emphatically and clearly that you cannot be part of such a discussion. Even if you believe your integrity has not been compromised by your presence at this discussion, report it to your supervisor and an AmSty lawyer.

I will be attending a trade association meeting next month. May I discuss an upcoming contract award with other bidders who will be there?

No. Do not discuss contract awards, prices, bids, terms of contracts, or similar proprietary business information with individuals from competing firms. If you have any questions, contact your AmSty lawyer.

10. EXPORTS AND IMPORTS

There are many laws in the USA and other countries governing international trade and commerce which serve to limit the export of certain products to certain countries. Because AmSty is an American-based company, the most prominent of these laws are the laws of the USA governing export of USA based products and technology. AmSty is committed to complying with USA export laws and other such laws. Under no circumstances will AmSty make sales contrary to these laws. Because these regulations are complicated and change periodically, employees and agents seeking to make a sale to a customer in a foreign country must first confirm the legal trade status of that country. If an employee or agent is uncertain about whether a foreign sale complies with USA export laws, the employee must contact the Legal Department. Employees and agents should also know there are laws that govern the import of products and technologies to and from the USA and other countries. The laws control what can be imported into the country, how the articles should be marked, and the amount of duty to be paid. AmSty complies with all import laws. If an employee or agent is uncertain about whether a transaction involving the importation of items complies with these laws, the employee must contact the Legal Department for guidance.

11. COMPUTER SYSTEMS AND TELECOMMUNICATION SECURITY POLICY

AmSty relies on computer systems and telecommunications networks to meet our operational, financial and informational requirements. It is essential that those systems be protected from misuse. The application/data owner and Information Systems share responsibility for such protection.

All employees, officers, and directors are required to be familiar with and follow AmSty' policies relating to Information Technology and Security. If you have questions, ask your supervisor or the Information Technology Group.

11.1. Use of Company Resources

AmSty' resources are primarily intended for business use. Company resources include computers and telecommunications services. Employees may occasionally use Company resources, such as a copy machine, Internet access, telephone, or e-mail, for personal use. Personal use of Company resources on an occasional and limited basis is acceptable as long as AmSty' policies are followed, there are no measurable increased costs, and co-workers are not distracted by the use.

11.1.1. Information Systems and Data

Computers and all information on AmSty' computers, as well as any AmSty' information on your home computer or other device, are Company property. Use licensed software or documentation according to licensing agreements, and do not duplicate it without express permission. Protect any passwords that provide access to Company networks.

You are responsible for what you say in an e-mail message. Do not use your AmSty title or contact information for personal mail, e-mail or anything other than Company business unless you have specific permission from your supervisor.

Each employee, officer and director must ensure that their use of AmSty' information systems, networks and tools meets AmSty' standards and policies, including Information Systems policies, security and data protection requirements, import/export regulations and local legal requirements.

INTEGRITY IN BRIEF..

Company property is intended for business use. Information stored on Company equipment—including voice mail, e-mail, hard drives, servers and other devices—is subject to Company review at any time.

INTEGRITY IN ACTION...USE OF COMPANY RESOURCES

I volunteer for a local organization that works with physically challenged kids. May I use Company equipment to copy flyers for a fundraiser?

While we encourage your participation in community activities on your personal time, using Company assets and property for personal reasons and non-Company projects is generally not acceptable. Your supervisor should specifically approve each and any use of Company resources for non-Company purposes since it involves use of Company property and costs the Company money.

Is it okay to copy software from my office computer to my home computer so I can do Company work at home?

Do not copy software without first securing specific approval from Information Systems. In particular, Microsoft Office licenses no longer allow copying of software licensed to AmSty for home use. The answer depends upon the terms and conditions of the software license.

May I use my office computer at work after business hours for schoolwork?

Check with your supervisor first. Generally, this type of use is acceptable as long as there is no measurable increase in cost to the Company.

Can I bring software from home and load it on my computer at work?

No. You should not use any software product in violation of its licensing agreement, or that is not approved for Company use.

I have a free electronic subscription to a recognized local newspaper in my country, which I obtained some time ago. I occasionally access the site from my AmSty Workstation. I find this to be a good way to receive local news and it's less expensive than receiving the paper in my office every day. Is this against AmSty policy?

A couple of times a day, not more than a few minutes at a time, I log on to Microsoft's home page on the Internet to check weather, the stock market and other information. Is this in violation of AmSty' computer resources policies?

The situations described are acceptable under AmSty' policies. While Company resources are primarily intended for business use, AmSty' guidelines do allow for some limited personal use. The Company recognizes that employees may use Company resources (such as a copy machine, telephone or e-mail) for personal use on an occasional and limited basis. This use is acceptable as long as AmSty' Information Systems and other policies are followed, there are no measurable increased costs, and co-workers are not distracted by the use. It is not possible to cover every situation in policy statements.

Good judgment should be the guiding principle along with consideration of the following factors:

- 1) AmSty' computer systems and telecommunication networks are business tools. Just as with any other performance issue, personal use of business resources that detracts from job performance or increases costs to AmSty will be addressed by your supervisor.
- 2) These resources must not be used for non-AmSty business, other for-profit activities, or unauthorized organizations and activities.
- 3) In general, you shouldn't do anything on AmSty' computer systems that would be inappropriate on paper or delivered through the mail.

If you have specific questions about appropriate use of AmSty' computer or other resources, discuss them with your supervisor. You may also contact Information Systems, HR or the Legal Department for further guidance.

12. SAFEGUARDING IMPORTANT INFORMATION

We put the highest priority on the respect and protection of personal data, as well as all confidential data of our Company.

AmSty' records, files, data, and technical information are critical to our success. We must all work to ensure that Company information is appropriately protected at all times.

12.1. Confidential Information

Confidential information includes trade secrets, proprietary know-how, personnel records, business plans and proposals, capacity and production information, marketing or sales forecasts and strategies, client and customer lists, pricing lists or strategies, construction plans, supplier data, business leads, and research and development (R&D) information.

Each AmSty employee, officer, and director is responsible for protecting all confidential information. AmSty information is for Company business use only. Disclose it only to those people with a legitimate business need to know that serves AmSty' interests. Do not discuss such information with people outside AmSty, including family members. Do not leave confidential records or documents in places where others may read them. Do not discuss or work with AmSty data in public areas where the conversation may be overheard or the data compromised.

We respect the trade secrets, copyrights, trademarks, and patent rights of others. Unless authorized by the owner, or if the use is an otherwise permitted use under the law, copying of such material may violate the law and the Code.

Do not disclose any previous employer's confidential information without written consent of that employer. If you leave AmSty, you have a continuing obligation to protect AmSty confidential information.

Improper receipt of others' confidential information may expose AmSty to potential legal liabilities. Improper disclosure of Company confidential information may result in the loss of valuable intellectual property rights. Do not ask for or disclose information that should remain private. This applies to Company information as well as to information that belongs to another entity such as a customer, supplier or competitor.

12.2. Data Privacy

Data privacy addresses the protection of personal data, which is any information that directly or indirectly identifies a natural person. Examples of personal data include personal, employment, medical, financial and education and training information. Most countries have laws regulating the collection and use of personal data, although the types of data covered, the nature of the protection, and local enforcement mechanisms vary. AmSty complies with all applicable laws. All employees are responsible for ensuring compliance with the data privacy requirements under the laws and regulations of the respective countries and under the Company guidelines/policies. Employees are expected to attend training, if required.

INTEGRITY IN BRIEF...

Avoid discussing confidential Company information, even with other employees, unless it is necessary for their job performance.

INTEGRITY IN ACTION...CONFIDENTIAL INFORMATION

I know that some of the information I work with is "AmSty Confidential." Does that mean I can't talk about it with anyone, even other employees?

AmSty Confidential means that the information should be kept secure. Discuss such information only with those who need to know for AmSty business purposes. If you have doubts, ask your supervisor to clarify the situation for you.

If I find some confidential documents in a copier or in a conference room, what should I do?

Though it might be tempting, do not read the documents. If you cannot locate the owner, turn the documents over to your supervisor. Do not leave the documents in the copier or in the conference room, and do not throw them away.

I was browsing the Internet and found some information about our market. I downloaded the article and I would like to use it in a proposal I'm writing. Do copyright laws apply on the Internet?

Yes, much of the material on the Internet is subject to copyright protection. If it is, you will need permission to use more than a short quote from the material. Contact the copyright owner to obtain permission. When you use any of the material, be sure to credit its source.

I need to disclose confidential information to an AmSty consultant or customer. What should I do?

Make sure that the information and the Company will be protected by a fully executed confidentiality agreement. Contact your AmSty lawyer.

12.3. Inside Information and Trading

Sometimes, employees have information about AmSty, its subsidiaries or affiliates, or about a company with which AmSty does business, that is not known to the investing public. Such inside information may relate to plans; new products or processes; mergers, acquisitions or dispositions of entities, businesses or securities; problems; sales; profitability; negotiations relating to significant contracts or business relationships with others; significant litigation; or other financial information. It is important to understand that any individual working at AmSty may acquire inside information and be subject to the following restrictions.

If the inside information is material—that is, if a reasonable investor would consider the fact important in reaching an investment decision—then the individual should not buy or sell AmSty securities nor provide such information to others, until such information becomes public. Further, individuals should not buy or sell securities in any other company about which they have material non-public inside information, gained as a result of their AmSty work or otherwise, nor provide such inside information to others, until such information becomes public. Insider trading also includes “tipping” or telling others about insider information. If another person buys or sells securities based on your tip, you (and they) can be guilty of insider trading even if you yourself do not trade.

Employees may sometimes need assistance in determining how the rules governing inside information apply to specific situations. Direct such questions to the Legal Group.

INTEGRITY IN BRIEF...

Individuals may not use any information about AmSty or any of our customers or suppliers for personal gain, unless that information is also available to the general public.

INTEGRITY IN ACTION...INSIDE INFORMATION AND TRADING

In the course of my job I’ve learned that one of our U.S. customers will soon be getting a large contract. Can I buy stock in this customer?

Not unless the information is available to the general public. Otherwise, U.S. Securities and Exchange Commission would consider it “insider information” and your purchase could lead to civil or criminal penalties.

I heard that one of our suppliers is about to acquire another company. The acquisition will probably increase the supplier’s stock price so I’d like to buy the stock now. Can I do so? And if I can’t, can I tell my brother about this stock tip?

The answer to both questions is no. Whether you buy stock yourself or advise someone else to buy it, you are violating insider trading laws and are subject to civil or criminal penalties. If you advise your brother, you could both be subject to penalties.

I have access to our earnings information before it is released. A close friend who is also an employee was curious about the numbers. She knows I can’t say anything directly, but if she asks me for hints about profits, can I give her a vague idea?

Disclosures of any type are inappropriate. This includes general statements, hints, gestures, or confirmation of a guess. It is improper to ask for or divulge such information before it is publicly released.

I work for an AmSty subsidiary outside the U.S. and learned that a related Company will announce a major M&A transaction next week. I can trade stock on a non-U.S. exchange. Do the U.S. insider trading laws apply to me?

U.S. securities laws may apply if some aspect of your conduct occurred in the U.S. or if your conduct had a substantial effect in the U.S. or upon U.S. citizens. Even if that were not the case, AmSty might incur liability, or at least be put in a poor light, because one of its employees had taken action that would have been a violation of U.S. securities laws if it had occurred in the United States. In any event, the action described would be a violation of the Code and is therefore prohibited.

12.4. Records Management

Records and information are important assets of the Company. They are vital components of our decision-making and operational processes and must be properly managed to obtain and preserve their full value. Each day you generate or are entrusted with these assets—assets required to conduct AmSty business. Mismanaging or even deliberately or inadvertently releasing these assets could provide others a business advantage, cause harm to AmSty or AmSty’ public image, or create unnecessary administrative costs.

All employees, officers and directors are required to be familiar with the Records Management policy and schedules applicable to their work. The Company needs to maintain the credibility of the records management program and minimize records related costs. It cannot tolerate gaps or records held beyond the established retention periods. Individual responsibility in day-to-day activities is key to effective information and records management. If you have questions, ask your supervisor.





13. INTERACTIONS WITH THE PUBLIC

AmSty encourages all employees to be active members of their communities while respecting the line between being a private citizen and Company spokesperson.

13.1. Charitable Activities

AmSty is a vital part of the communities that host our facilities. AmSty participates in many humanitarian and charitable endeavors around the world. That participation ranges from cash contributions to donations of AmSty' products and other resources.

When the Company elects to participate in a community project and utilize limited employee time and Company resources, site management communicates to employees in advance that the effort is a Company sponsored project.

Be sure to separate your personal community activities from your work. Pursue community activities on your own time, with your own resources and as an individual private citizen, not as a representative of AmSty. Do not claim to represent, or imply representation of, the Company to the public or in any public process or forum unless specifically requested to do so by management.

INTEGRITY IN ACTION...CHARITABLE ACTIVITIES

I would like to use Company stationery to write thank-you letters to people who participated in a recent charity event. My co-workers and I coordinated the event on our own time.

While it is proper to thank participants for their help, you cannot use Company stationery to do so. Even though the coordinators of the event happened to be AmSty employees, the event was not Company-sponsored. As such, the use of Company stationery or resources for any part of the event would be improper and could also give the wrong impression that the event was sponsored or endorsed by the Company.

What should I do if another employee asks me to contribute to his or her favorite charity?

An employee should never feel compelled to contribute to charities. Supervisors and managers should be especially sensitive that their levels and positions in the Company could lead people to feel pressured to contribute.

13.2. Political Activities, Political Contributions and Lobbying

AmSty encourages our employees, officers, and directors to contribute to the community and to fully participate in local, national and international political processes. However, there are certain ethical guidelines for doing so.

As a private citizen, you are free to make contributions to causes, candidates or political parties of your choice. If you express a personal view in a public forum (such as a letter to the newspaper), do not use Company letterhead or Company e-mail or reference your business address or title.

AmSty will comply with all relevant laws regulating its participation in political affairs. Political Contributions by AmSty must be:

- Made in accordance with local and US law;
- Approved in accordance with the Delegation of Authority; and
- Properly recorded.

AmSty may sometimes express its views on local and national issues that affect its operation. In such cases, funds and resources may be used, but only when permitted by law and under strict guidelines authorized by our Board of Directors. If you have any questions or concerns regarding lobbying activities or political contributions, please contact the Legal Department. If you have knowledge of or suspect a violation of law relating to lobbying and political contributions, please promptly report it to the Legal Department or to the AmSty Hotline at 888-399-0406.

INTEGRITY IN BRIEF..

If you give a personal opinion on public issues, do not create the impression that you represent AmSty or are expressing the views of AmSty.

13.3. Communications With the Public

AmSty strives to communicate with the public in an accurate and consistent manner. To be sure that we comply with the law while still protecting our confidentiality and interests, only those who are specifically trained in particular areas and whose job responsibilities include communications with the public or the media should represent AmSty to the public or the media. If you receive an inquiry, either verbal or written, from an outside contact about a Company matter, direct the inquiry to the Legal Department.

INTEGRITY IN BRIEF..

In community or cultural activities, you are free to present your personal views, but make it clear you are speaking on your own behalf.

INTEGRITY IN ACTION...COMMUNICATIONS WITH THE PUBLIC

An industry analyst called to ask for a comment in connection with my work. I knew the answer to his question. Can I tell him what he wanted to know?

You should not answer any questions about AmSty business from analysts, reporters or anyone else outside of the Company (other than government agents acting within the scope of their duties). Refer calls from financial analysts calls from the media to the Legal Department.

I have been asked to make a presentation at a trade association meeting. Is this okay?

Yes, but if the presentation involves your work at AmSty, you must have management approval and appropriate review and approval of the content of the presentation. In situations like this, both you and AmSty should be sensitive to issues related to security, the protection of confidential information and other potentially sensitive issues.

I received a call asking for a reference for a former co-worker. What should I do in a case like this?

Employees can give personal references for co-workers for non-employment matters (for example, if they are applying to a program of study or adopting a child). If the questions involve employment topics or evaluation of performance, refer the call to HR.

14. CORPORATE SOCIAL RESPONSIBILITY

The continuing development of international codes of conduct and principles governing corporate social responsibility are positive indicators for redefining business accountability for the 21st century. AmSty respects and supports the efforts of others in such endeavors and also recognizes that every global code of conduct and/or social responsibility initiative may have a significant impact on our Company's operations and businesses worldwide. AmSty will continue to review and understand the implications of the initiatives in order to remain consistent, wherever possible, with those external codes.



15. REPORTING VIOLATIONS

If you observe or suspect a violation of the law or AmSty policies, including the Code, report it to your supervisor or another AmSty manager, HR or the Legal Department. AmSty expects you to seek advice when you have a question and to recognize actual or potential problems.

While we respect the privacy interest of individuals, we will appropriately investigate any behavior that may violate the law or AmSty' policy, damage the reputation of AmSty or impact safety. All employees, officers and directors must fully cooperate with any such investigation.

16. NON-RETALIATION POLICY

If you report what you suspect to be unethical or illegal activities, you should not be concerned about retaliation from others. AmSty will not tolerate any reprisal or retaliation against a person who, in good faith, reports a known or suspected violation of the law or of Company policy, including the Code. AmSty will take disciplinary action, up to and including termination of employment, against any employee or officer involved in retaliation.

17. AMERICAS STYRENICS ETHICS HOTLINE

The AmSty Ethics Hotline is available globally, with multi-lingual capabilities, 24 hours a day, seven days a week. The Ethics Hotline is not answered on AmSty premises. It is operated by a professional service that provides similar services to other global companies. Use of an outside professional service allows callers the ability to remain anonymous, if they prefer.

TO REACH THE AMSTY ETHICS HOTLINE, DIAL: 888-399-0406

When you call the AmSty Ethics Hotline a trained communications specialist answers your call, listens as you ask questions or describe your concern, and then provides you with a unique code number and date to call back to follow-up on the status of your call. Translation services are provided if you would prefer to speak in a language other than English.

Following your call, the communications specialist documents your question or concern and forwards the report to the Legal Department for review and handling. The outcome of the Company review will be relayed to you when you call the Ethics Hotline on the scheduled date for the follow-up.



Americas Styrenics LLC
Corporate Headquarters
24 Waterway Avenue, Suite 1200
The Woodlands, TX 77380
888.55.AmSty (26789) toll free

amsty.com