

Kemin Team -

As you prepare to sign the 2025 Kemin Code of Conduct, please review the updated language in the following sections:

- Code of Conduct: Entertainment, Gifts, and Other Business Courtesies
- Code of Conduct: Company Business Events
- Code of Conduct: Equal Opportunity & Diversity
- Code of Conduct: Compliance With the Law
- Fiduciary Manual: Payment Authorization
- Fiduciary Manual: Data Integrity

For your convenience, all updated language has been marked in red.

If you have any questions about this or any other section of the Kemin Code of Conduct or Fiduciary Manual, please contact your HR Business Partner.

- Worldwide HR Team

CODE OF CONDUCT

KEMIN COMPANIES WORLDWIDE

English Version*

Revision Dates

(most recent showing)

November 15, 2005

January 1, 2007

January 1, 2008

January 1, 2009

January 1, 2010

January 1, 2012

January 1, 2014

January 1, 2015

January 1, 2016

January 1, 2017

January 1, 2018

April 5, 2018

February 18, 2019

January 1, 2020

February 1, 2021

February 1, 2022

March 1, 2023

April 1, 2024

January 1, 2025

***Also available in Spanish, Portuguese, Chinese, Dutch, Russian, French, and Italian**

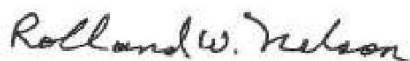
MESSAGE TO KEMIN TEAM MEMBERS

The values reflected in Kemin's Vision and Value Statement are the bedrock upon which the Company was founded and is operated. The first, and most important, of these values is "integrity with our colleagues, our customers, our suppliers, and ourselves." Integrity can have many definitions, but it must, in the end, be our own honesty/truthfulness with ourselves and those around us. Integrity is the foundation upon which Kemin builds its business success, our quality products, our services, and our relations with our colleagues, customers, suppliers and ourselves. Our competitive excellence begins and ends with our commitment to integrity as witnessed by ethical conduct.

This Code of Conduct attempts to clarify the Company's position with some of the many situations that you may find yourself in as a Kemin team member. Most of all, the guidelines noted here are just that - guidelines. The final question as to whether a particular act violates the Code of Conduct for the Company is one that can only be made after reflection within oneself and with one's colleagues and managers.

Kemin's Code of Conduct is meant to ensure the longevity of our Company as well as protecting the Company's assets. We urge you to read this booklet extremely carefully. This document encompasses many parts of our Personnel Handbooks but is not intended as a replacement of those documents. Kemin remains an employer at will as provided by law. The Code of Conduct is not a contract of employment. All employees worldwide will be asked to testify to their adherence to the Code yearly. If you have any questions, take them up with your supervisor at the earliest possible date. If you would like to report a violation to the Code of Conduct or suspect any fraud within the organization they can be reported anonymously to your supervisor, online at Kemin.Ethicspoint.com, using the Ethicspoint telephone hotline, or to the email Auditor@Kemin.com.

Again, we urge you to read this document and adhere to this Code.



R. W. Nelson
Chairman of the Board



Christopher E. Nelson, Ph.D.
President & CEO

Table of Contents

MESSAGE TO KEMIN TEAM MEMBERS	3
BUSINESS CONDUCT	6
Values	6
Entertainment, Gifts, and Other Business Courtesies	6
Payments to Government Officials	7
Personal and Corporate Political Activity	7
Facilitating Payments	7
CONFLICTS OF INTEREST AND OUTSIDE BUSINESS ACTIVITIES	8
Other Employment	8
Investments and Investment Income	8
Financial Interests	8
Personal Relationships	9
Competing Against Kemin	9
Distributors and Sales Agents	9
Is There a Conflict?	9
CORPORATE OPPORTUNITIES	9
Misuse of Position	10
Sales To or From Kemin	10
Use of Kemin Assets or Labor	10
Theft or Fraud	10
Employment of Related Parties	11
Inter-Personal Relationships	11
Company Business Events	11
Expense Accounts	11
SAFETY, HEALTH & ENVIRONMENTAL PROTECTION	11
INTERNAL CONTROL	12
EQUAL OPPORTUNITY & DIVERSITY	12
ELECTRONIC COMMUNICATIONS & SOCIAL MEDIA	13

PROPRIETARY INFORMATION	13
GOVERNMENT RELATIONS.....	13
Government Employees	14
Government Investigations	14
COMPLIANCE WITH THE LAW	14
CONSULTANTS	15
OBTAINING COMPETITIVE INFORMATION.....	15
INCORPORATION OF FIDUCIARY MANUAL	15
REPORTING VIOLATIONS OF THE CODE.....	15
DISCIPLINE FOR CODE VIOLATIONS	16
PROTECTION OF PERSONAL INFORMATION.....	16
For Non-European Union Employees:.....	17
For European Union Employees.....	17
SIGNING THE CODE OF CONDUCT AGREEMENT	17
CODE OF CONDUCT AGREEMENT YEARLY RENEWAL	18

BUSINESS CONDUCT

Values

Kemin established a key list of value statements that reflects the culture and beliefs of the Company. These statements are the bedrock of the Code of Conduct. Violation of these values is not acceptable.

- ☐ **TEAMWORK** across regions, functions and business units.
- ☐ **INTEGRITY** with our colleagues, our customers, our suppliers and ourselves.
- ☐ **PASSION** for sustainably transforming the world.
- ☐ **SERVANT LEADERSHIP** as the foundation for all our decision-making.
- ☐ **SAFETY** at the core of everything we do and create.

It is our intention to hire only those individuals who possess these values. The values will be upheld in all Kemin business dealings.

Entertainment, Gifts, and Other Business Courtesies

It is oftentimes customary for vendors and even customers of the Company to entertain you for purposes of furthering their businesses. Oftentimes these agendas correspond closely with the objectives of Kemin. It will be the policy of the Kemin that:

- ☐ You may accept from customers, as well as vendors, meals at which customers or vendors are present and where Kemin business is predominantly discussed.
- ☐ Receipt of any tangible items (such as gifts, tickets, etc.) shall be turned over immediately to the local Human Resources Manager for raffling and/or distribution to all Kemin employees. Local operating companies may wish to define this policy in more detail. This policy is extended to include any gifts that may be delivered to the home of a Kemin employee by a customer or vendor.

Oftentimes vendors **or customers** offer expense paid trips to visit their plants and/or facilities **or a networking event**. These trips can be valuable for Kemin employees to further understand partnerships with our vendors. You may accept expense paid trips when the predominant discussion concerns Kemin business **or to strengthen our industry network**. In general, an employee's spouse could accompany them and still meet the test criteria of a predominantly business activity. **It is always good practice to contact Human Resources before accepting invitations to such visits or events.**

It is important to Kemin and to conform to various laws globally, that you remain free of undue influence as you make commercial decisions for Kemin. Therefore, you shall not accept money, commissions, tangible or intangible items or benefits from a Kemin vendor, customer, distributor or sales agent or a potential Kemin vendor, customer, distributor or sales agent for any reason. This includes a loan, even if both parties intend that the loan be repaid. Acceptance of such items is a violation of the Code. If you are aware that your family members are accepting tangible or intangible items or benefits from a Kemin vendor, customer, distributor or sales agent or a potential Kemin vendor, customer, distributor or sales agent for a reason that could influence the professional relationship between Kemin and this third party, then this activity is a violation of the Code. Kemin's anti-bribery and anti-corruption compliance activities are overseen globally by Libby Nelson, VP and General Counsel, and at a regional level compliance with this Code of Conduct will be monitored by the BU Finance Director. Potential violations of this Code should be brought to their attention or the attention of WW Internal Audit using the reporting tools on Page 15.

Payments to Government Officials

It is Kemin policy to follow the Foreign Corrupt Practices Act (FCPA) of 1977. In general, the FCPA prohibits offering, paying, promising to pay, or authorizing payment of money, gifts, or anything of value to a foreign or government official: (1) to influence any act or decision by the official; (2) to induce the official to use his or her influence to affect any act or decision; or (3) to seek any improper advantage to assist the company in obtaining or retaining business.

It is the policy of the Company that we will not make payments or provide anything of value (payments are defined as cash payments, reimbursement of expenses or gifts) to individuals within any government for actual or implied preferences or favors for Kemin business. No payments or offers of payments of anything of value will be made to governmental officials or to political parties or candidates for political office in order to secure, retain or direct business. Payments made indirectly through an intermediary to government officials where intermediaries have indicated that such payments will be passed along for prohibited purposes, are also in violation of the Code of Conduct and are strictly prohibited.

In some cases, it may be customary to provide gifts of nominal value as a token of esteem, courtesy, or in return for hospitality. Nominal gifts (not cash) of up to \$100 USD in value can be provided with the approval of either the Business Unit President or Finance Director. Any gift above \$100 USD must be approved by the WW President and General Counsel. All gifts to government officials must comply with the following:

1. No gifts in cash or gift cards
2. The gift shall be permitted under both local law and the guidelines of Kemin and governmental agency
3. The gift should be a value that is customary for the country involved and appropriate for the occasion.
4. The gift should be presented openly with complete transparency
5. The expense for the gift should be correctly recorded on the Company's books and records.

Campaign contributions by individuals are not included in this section of the Code. You may personally contribute to the candidate or causes of your choice in a manner consistent with the law.

Personal and Corporate Political Activity

Personal Political Activity: Kemin believes that you should participate fully in the process of participatory government at all levels in each country where Kemin employees live. You are encouraged to vote and contact your elected representatives or appointed government officials as applicable. You are encouraged to participate in governmental committees, task forces, boards, or other areas of government as time permits. These personal contacts are permissible under this Code.

Corporate Political Activity: From time to time, you may contact political office holders and appointees to advocate a position or support legislation or policy matters that affect our business. From time to time, Kemin may assist a political candidate by providing access to its property for filming or other uses. However, prior permission must be obtained from the Worldwide President or the Chairman to permit use of Kemin property for a political purpose. Kemin logos may not appear in any political advertising. Kemin will not directly contribute to any political party, nor will you be reimbursed for a contribution you make for a political purpose.

Facilitating Payments

Because Kemin operates on a worldwide basis in many different countries and cultures, it is recognized that sometimes facilitating payments to various government agents or intermediaries must be made to achieve Kemin's corporate objectives. These types of payments are permitted if the payments are made for services and rights, which Kemin is legally entitled to have under the law and the transactions are in accordance with the relevant legislation¹. The payments cannot be made to secure, retain or direct business in a particular country. Facilitating payments shall only be made with the prior approval of the president/CEO of Kemin Industries, Inc. and General Counsel.

¹ See Foreign Corrupt Practices Act of 1977 ("FCPA"), 15 U.S.C. §§ 78dd-1, *et seq*

CONFLICTS OF INTEREST AND OUTSIDE BUSINESS ACTIVITIES

Other Employment

Kemin recognizes and respects that you may take part in legitimate financial, business, and other activities outside your job. However, those activities must be lawful and free of conflicts with your responsibilities as a Kemin employee. It's up to you to avoid situations in which your loyalty may become divided. If you have a conflicting activity outside your Kemin employment, you need to report the conflict to Kemin on the annual renewal form or when the conflict arises, and keep the form updated with changes on an annual basis. Kemin considers all of these types of conflicts of particular relevance to its business interests.

From time to time, you may be solicited to be a "paid or unpaid expert" from marketing companies or others as a result of your experience at Kemin and in the various industries or markets where we sell Kemin products. The approach to you is generally in the form of an email where you are asked to join a panel of subject matter experts to discuss areas involving Kemin's markets. Before you can accept this type of engagement, Kemin must understand the scope of the engagement as you could inadvertently disclose Kemin's proprietary information as part of these panels and violate your duty of non-disclosure to Kemin. Approval from the BU President and BU Head of Regulatory will, therefore, be required.

Investments and Investment Income

Kemin encourages its team members to have outside investments as part of a person's total financial interests. It is actively encouraged that our employees would have passive investments in a variety of companies, real estate, and other financial tools. For our members of Leadership Teams, these investments need to remain strictly passive. This means that a Leadership Team member cannot take an active role in management of the investment. Examples of excluded activities would include managing real estate where active repairs, solicitation of leaseholders, or other management activities would take place. Leadership team members should not act as managers or board members of any business outside Kemin without the written approval of the CEO. Kemin employees should not act to have any significant financial interests in Kemin's potential or current customers or suppliers. Kemin employees should not engage in business dealings with individuals employed by our customers, lest those relationships come to damage Kemin's business. In all cases, any business dealing that may remotely qualify under these sections must be reported in the "Conflict" Section of the Code of Conduct each year. All investments which may be anything more than passive, must be declared in the "Conflict" Section of the Code of Conduct each year.

Financial Interests

Under no circumstances may employees have business or financial interests which could damage Kemin. A business or financial interest may damage Kemin if your job, the amount of your investment, or the particular company in which you invested could—when viewed objectively by another person—influence your actions as a Kemin employee. This includes loans of more than \$100 USD between Kemin employees. Such conflicts of interest must be avoided. A conflict of interest may also arise when you invest in publicly traded companies or privately held companies. When considering these investments, you should consider the following:

- ☐ What is the extent of the competition or the nature of the relationship between Kemin and the other company?
- ☐ What is the size of my investment in relation to my salary and other family income, including income from other investments?
- ☐ Is it significant enough to cause me to take some action as a Kemin employee to protect or enhance my investment?

If your answer to any of these questions will present you with a question regarding your loyalty to Kemin, then an improper financial interest probably exists and should be avoided. If you have any questions, you should consult with the business unit president. You should not evade these guidelines on business or financial interests by acting indirectly through anyone else including family members. All potential conflicts of interest must be reported annually on the form included in the Code of Conduct.

Personal Relationships

You may find yourself in a situation where a family member, a household member or someone else you are close to is a competitor, distributor, sales agent or supplier of Kemin or is employed by one. You personally may be connected to a third party by virtue of a personal friendship acquired during prior education or employment. The closeness of these relationships might lead you to inadvertently compromise Kemin's interests. If you have any questions about your situation, you should note the conflict on your annual renewal and review it with your manager to assess the nature and extent of any concern and how it can be resolved.

Competing Against Kemin

Employees should be careful to avoid activities that conflict with Kemin's business interests. Obviously, you may not commercially market products or services in competition with Kemin's current or potential product offerings. Such marketing activities are "commercial" if you receive direct or indirect remuneration of any kind. Because Kemin is rapidly expanding into new lines of business and new areas of interest, the Company will constantly redraw lines of acceptable activity. It is therefore your responsibility to consult with your management to determine whether your planned activity will compete with any of Kemin's actual or potential businesses. This should be done before you pursue any activity that might create a conflict of interest with Kemin. Any activity where you are selling a product or service outside of Kemin must be reported annually on the form included in the Code of Conduct.

Distributors and Sales Agents

In the normal course of its business, Kemin utilizes a variety of distributors and sales agents in various states and countries. Selection and maintenance of these business partners is outlined in Kemin Core Documents. Conflicts of interest are inherent when family members are appointed as distributors or sales agents. Such appointments create unstable business relationships and harm Kemin's efforts to maximize business opportunities. Therefore, it is Kemin's policy that it will not appoint family members of Kemin employees as distributors or sales agents. Additionally, Kemin employees shall not have a financial interest of any kind in a privately held distributor or sales agency firm that is a customer or competitor of Kemin. (If a distributor or sales agency firm is publicly traded, a Kemin employee may hold a minority investment, but may not participate in the management of the firm either as a director or manager.) If a family member works for a distributor or sales agency firm that is in a business relationship with Kemin, this relationship must be declared on the Code of Conduct Yearly Declaration. Kemin employees are prohibited from receiving any money, remuneration, distribution, commissions, gifts or trips from these partners. All remuneration gifts or trips received from a distributor or sales agent must be reported in the Code of Conduct Yearly declaration regardless of value. Exceptions can only be granted by the President of Kemin Industries and must be obtained in writing before any agreements are discussed or put in place.

Is There a Conflict?

If there is the smallest doubt regarding the existence of a conflict, you must present the potential conflict of interest in advance to your manager and business unit president who will provide you with a decision in writing regarding the conflict. The Business Unit President may also make exceptions to any of the conflicts described in this section.

CORPORATE OPPORTUNITIES

Business opportunities, which you learn about as a result of your employment with Kemin, belong to Kemin. As an employee, you may not take advantage of these business opportunities for personal gain if the opportunity is within the scope of Kemin's existing or contemplated business unless you obtain prior written permission from the Worldwide President or the Chairman. If you choose to take advantage of a business opportunity as contemplated by this provision without following this procedure, you will be in violation of the Code.

Misuse of Position

You are prohibited from utilizing your position for personal gain or profit. The rewards for your work should be through the normal salary and bonus programs offered by the Company. You are prohibited from accepting any other payments for work in this regard. You are also prohibited from offering or paying or promising to pay any other or further compensation to other Kemin employees beyond that of normal salary or bonus plans. Theft of any kind is not consistent with Kemin's values and is unacceptable.

Sales To or From Kemin

As a general rule, you may not sell any item to Kemin or buy any item from Kemin without specific written approval of the local operating President. However, you may purchase the following items from the Company without violating this provision of the Code:

- ☐ Promotional items such as shirts, pens, cups, paper and the like;
- ☐ Products that are offered to you as an employee at a discount including but not limited to Lutein, the tea and spearmint products, and Slendesta
- ☐ Products that are purchased from a distributor or other customer of Kemin, e.g., Fresh Cut purchased from a co-op;
- ☐ Items purchased at charitable auctions, fundraisers, or other Company sponsored events; or
- ☐ Items purchased at Company-sponsored auctions or sales of unused or obsolete assets.

Use of Kemin Assets or Labor

You are prohibited from using any Kemin asset for personal gain or personal use. Similarly, it is not permissible to use Kemin labor for personal use or gain, in a situation where this could lead to a conflict of interest in the professional relationship between yourself and the other Kemin employee. The local operating President may approve exceptions.

You are allowed to use communication resources (phones, computers, fax, etc.) for personal use so long as the use does not interfere with timely performance of work duties and does not interrupt or delay business communications.

Kemin has the right to inspect all communication resources or any company property for any purpose at any time, including any personal information contained therein consistent with local law. You cannot use password protection or any other method to prevent Kemin from inspecting any Company property.

You may not remove any other Kemin property from customary work locations for personal use without written permission. Where Kemin specifically allows an employee to use Kemin property for personal purposes, the use must be approved in advance by the local operating President or their designee in writing.

If you leave Kemin employment for any reason, all Kemin property must be returned to the Company, including but not limited to computers, telephones, mobile phones, printers, keys, computer components or applications, lists, files, literature, and CDs.

Theft or Fraud

Anytime you detect a potential fraud or theft of company property, by yourself or others, you must report this immediately to your management. Fraud would also include purposely hiding actions or activities that violate applicable law, regulations, or Kemin policy. A potential fraud of any value or theft of company property (in excess of \$USD 100) must also be reported within 24 hours to Internal Audit. Fraud tips can be reported anonymously to Internal Audit via the Ethicspoint website or hotline or by email to Auditor@Kemin.com. Internal Audit is charged with the responsibility of fully investigating the observation/suspicion and reporting it to the proper level of management.

Employment of Related Parties

Kemin encourages more than one member of a family to be employed with the Company. However, because of the perception of favoritism, no person of the same family (whether by marriage or birth or a domestic partnership relationship) can directly report to another family member, without written permission from the local operating President. Kemin shareholders are exempt from this policy. In addition to this exemption, any family relationship in the Company should be reported on the Conflict-of-Interest section of the Code of Conduct annually.

Inter-Personal Relationships

The development of intimate sexual interpersonal relationships in the workplace is not an uncommon event. The development of such a relationship is not by itself a violation of Kemin's Code and in fact many marriages have their roots to the Kemin workplace. However, a conflict of interest may arise as a result of this relationship if it interferes with your work duties. Workplace behavior should always reflect Kemin's values of integrity and respect with our colleagues. This includes respecting the fidelity of the marriage contract. The concept of respect among us is universal and not limited by the geography of any country.

A conflict of interest will always arise if a supervisor and a subordinate have an intimate sexual interpersonal relationship. In the United States and many other countries, when this type of relationship develops at work, it may be illegal, and it may expose Kemin to liability for sexual harassment. When this type of relationship develops, you must always report the relationship to Human Resources at the time it develops, and appropriate steps will be taken to avoid any disruption of Kemin's business activities or exposure of Kemin to any liability as a result of the relationship.

Company Business Events

Kemin employees are expected to attend business events to which they are invited, when practicable, and to generously participate. Therefore, it is expected that no spouses, significant others, family, or other personal guests will stay in accommodations paid for by Kemin during Kemin business events. Personal guests are welcome to come before the events' start date or after the events' end date to enjoy a personal holiday with all expenses being paid for by the employee. This policy does not apply to events where a spouse or significant other is specifically invited to attend. **In special circumstances, an Employee can request a waiver of this policy, in writing, from the Kemin Industries CEO.**

Expense Accounts

You need to conform to the locally generated Kemin expense account policy. This written policy is available from each local Director of Finance. Violation of the expense policies is a violation of the Code of Conduct and may result in disciplinary action up to and including termination.

SAFETY, HEALTH & ENVIRONMENTAL PROTECTION

It is Kemin's worldwide policy to operate its business in the most environmentally responsible manner as possible. To this end, we will always try to operate our facilities to a higher than the regulated standard within any geographical location. Kemin will practice a policy of stewardship regarding the land, water and air, which surround its facilities with the intent of always leaving these resources cleaner than they were before Kemin utilized them.

You need to adhere to all local and national environmental protection legislation. Local legislation shall be compared to regulations as published by the United States Environmental Protection Agency. We will strive to apply the stricter regulations of the two. You shall never dispose of hazardous waste or other chemical materials without proper authorization through Kemin's regulatory or compliance officers.

Spills or unauthorized release of chemicals shall be promptly and completely reported to all relevant government agencies, as well as to the local operating President and the Worldwide President.

In the same way, Kemin will compare local legislation on working conditions to the regulations published by the United States Occupational Safety and Health Administration. We will strive to apply the stricter regulations of the two. You should bring any unsafe working conditions to the attention of your supervisor and, if needed, follow up with the EHS team at your location. Each of us plays a very important role in creating and maintaining a culture of safety at Kemin.

INTERNAL CONTROL

In order to safeguard the assets of the Company, a series of internal controls have been established. These internal controls are by no means complete. These controls are outlined in the document “Fiduciary Manual.” Please be certain that you have read and are familiar with these policies.

It is your duty to protect the assets of the Company, whether they are physical assets, intellectual property, cash or cash equivalents. If you believe that the assets of the Company are being misused, wasted, misappropriated, or put at serious risk by the actions or inactions of other employees, you are required to immediately report the matter or event. This reporting should be directly to the Worldwide President or Chairman, as well as the local operating President. Reporting can also be made to Internal Audit via the Ethicspoint website or hotline or by email to: Auditor@Kemin.com.

Kemin has established an internal audit function. As a Kemin employee you are required to cooperate completely, honestly and openly with the internal auditors. If you are asked to assist with an internal audit project, locate documents for copying, or meet with the internal auditor, you are required to comply fully.

Data integrity is of critical importance to the success of Kemin. You should always be sure that information or records that you generate are truthful and provide an accurate view of our business situation. Falsifying information or making misrepresentations to others may constitute fraud and could subject you, and the company, to severe penalties. More information on the steps Kemin takes to assure the integrity of company data can be obtained from Kemin’s Data Governance Manager and is also contained in the Fiduciary Manual.

EQUAL OPPORTUNITY & DIVERSITY

It is the policy of Kemin not to unlawfully discriminate in employment on the basis of race, religion, national origin, gender, disability, age, marital status, citizenship status, veteran status, sexual orientation, gender identity, or status regarding public assistance. Further, Kemin will adhere to all local standards in regard to unlawful discrimination in employment.

Kemin’s employees are as diverse as the varying cultures in the roughly 128 countries in which we do business. Kemin values diversity as a source of creativity and believes that creativity is essential to growth. Without growth, we cannot achieve our mission or vision. We celebrate diversity because it is absolutely critical to our success as a company. **Kemin unequivocally endorses legislation, rules or regulations that prohibit workplace harassment in the localities where Kemin has employees or operations.**

Kemin’s harassment policy prohibits workplace harassment or violence (sexual or otherwise) toward another employee. Such behavior within the workplace will not be tolerated under any circumstances. Harassment is defined as unwelcome or hostile verbal, physical or visual conduct, **inappropriate discourse in email or other form of online communication, or unwelcome virtual gestures in digital/remote workplaces** towards an individual because of race, religion, national origin, gender, disability, age, marital status, citizenship status, veteran status, sexual orientation, gender identity, or status regarding public assistance, when the conduct:

- ☐ Creates an intimidating, hostile or offensive work environment as defined by the law;
- ☐ Causes work performance to suffer; or
- ☐ Negatively affects job opportunities.

Kemin's harassment policy also prohibits inappropriate behavior; behavior that does not meet Kemin's Value Statement and standards for the workplace, even if it is not illegal and no one has complained. The Kemin workplace anti-harassment policy is designed to promote a congenial workplace where employees are treated with dignity and respect. Violations of this provision must be reported through established local procedures.

Kemin property shall not be used to display, acquire, or store pornographic material of any type, such as posters on the wall, material stored on a computer, pictures at your desk, etc. This behavior is strictly forbidden because it does not create a professional atmosphere, is potentially offensive to other employees, customers and suppliers, and may create a hostile work environment that is prohibited by law.

Strengthening the minority business community economically contributes to the overall economic growth and expansion of Kemin's markets. Therefore, it is Kemin's policy to offer minority businesses an opportunity to compete on an equal basis with all other potential suppliers. In addition, our Company will assist in developing and strengthening minority businesses.

ELECTRONIC COMMUNICATIONS & SOCIAL MEDIA

It is important that employees use good judgment when engaging in discussions on social media platforms such that their actions do not reflect negatively on the business reputation of the company. We should strive to represent the company online in the same way we would when attending a trade show or conference or while visiting a customer or vendor in person. Unless you are authorized to post on behalf of Kemin on approved social media outlets, always make it clear that you are speaking in your personal, rather than professional, capacity. Employees should never use Kemin electronic resources to intimidate or harass another individual, to engage in "hacking" or other electronic espionage, or for the commission of any crime.

PROPRIETARY INFORMATION

All inventions, improvements, discoveries, formulas, or processes which have been invented or discovered by you will at once be fully disclosed to Kemin and will be the sole and absolute property of Kemin. Kemin will be the sole and absolute owner of all patents, copyrights or any other intellectual property rights.

You cannot during your employment with Kemin and after the termination of your employment, divulge to any person or persons not connected with Kemin, any of Kemin's business methods, systems, forms, names and addresses of customers and suppliers, personal information (including names, addresses and contact details of contacts at customers and suppliers, trade secrets or any other proprietary business information of Kemin. During your employment and after termination of your employment you need to keep secret all processes, inventions and formulas learned by you or made known to you while in the employ of Kemin and you will not disclose or make known or do anything relating to any of these matters to any other person, firm or corporation except when authorized to do so in writing by the local operating President.

When you are employed by Kemin you are asked to agree not to compete with Kemin in the event you leave Kemin employment consistent with the non-compete agreement or your individual contract of employment. Each year it is important to affirm by signing the Code that you will not compete with Kemin or disclose confidential or trade secret information in the event you accept employment with a Kemin competitor. However, where non-competition provisions in employment relationships are inconsistent with local law, or additional requirements are fixed by local law, Kemin will abide by those requirements.

GOVERNMENT RELATIONS

Governments throughout the world both regulate and do business with Kemin. In all such transactions, our relationships with these governments shall be open and transparent. We will make every effort to develop and maintain all governmental filings as complete and accurate as possible. When discrepancies in previous filings are found, appropriate responses and

corrections of these fillings will be discussed and reported to the local operating President.

Government Employees

You will never offer a government official any type of remuneration or inducements for favoring Kemin with business. Nor shall you attempt to use something of value to influence a government official to act or make a decision that induces the foreign official to do or omit doing any act in violation of his or her lawful duty or secures an improper business advantage or induces a government official to use his or her influence to affect or influence any government act or decision that may affect Kemin's business. You may encounter government officials at many levels. Some examples include customs, immigration and transportation workers, employees of state-owned enterprises, doctors, veterinarians, nurses, pharmacists, lab technicians, employees in charge of issuing permits, registrations, licenses, port authorities, judicial employees, police and security officers, and governmental agency inspectors or contractors working for inspection agencies.

Government Investigations

Kemin will be forthright and open in all government investigations as provided for by local law. You shall not shred, incinerate or otherwise destroy papers that may be the subject of government investigations. Additionally, you shall not destroy electronic documents that may be the subject of government investigations. You must adhere to the document retention schedule that is established by Kemin policy worldwide and locally to comply with various applicable laws.

COMPLIANCE WITH THE LAW

Kemin respects the laws of each country. **All employees are expected to adhere to the laws where they are located and those required when working for a company based in the United States. When employees see a coworker or other individual violating the law they are expected to raise this to the other individual and to others in Kemin management.**

Kemin respects and adheres to the laws of each country regarding the minimum hiring age for employees and requires verification of age before employment is offered. Kemin also ensures all employees are paid, at least, the minimum wage as required by their location.

Kemin complies with existing employment regulations regarding forced labor. All contractors and suppliers are similarly required to meet these conditions. To that end, it is Kemin's policy that its relationships with its suppliers are based on lawful, efficient, and fair practices. Kemin expects its suppliers to obey the laws that require them to treat workers fairly, provide a safe and healthy work environment and protect environmental quality. Kemin expects its suppliers to follow its guidelines to help ensure that Kemin's supplier relationships will not damage Kemin's reputation. Kemin will incorporate these requirements into its business agreements whenever possible. Kemin does not retain employee identification documents and expects its suppliers to follow similar practices.

In furtherance of this policy, Kemin uses its purchasing documents to require its suppliers to comply with all relevant law including a requirement that Kemin suppliers do not utilize forced, prison, or indentured labor, or subject workers to any form of compulsion or coercion. Kemin's suppliers are to expect the same standards of compliance from their suppliers as well.

Kemin ensures compliance with this requirement by conducting onsite audits, desk audits, asking suppliers to fill out questionnaires and obtaining continuing guarantees of compliance with all relevant law. In addition, Kemin's purchasing, and quality control staff are alert to recognizing environmental, health, safety and labor issues that could cause inconsistent adherence to Kemin's supplier requirement. Kemin asks its staff to be vigilant and report all suspicions of improper conduct by any supplier so that an appropriate investigation can be made. Kemin uses its own staff to verify supplier compliance with their representations regarding obeying all relevant law. Kemin staff visit suppliers from time to time and Kemin relies on supplier questionnaires to support compliance.

Suppliers that fail to meet Kemin's expectations are terminated. Employees at all levels who violate the spirit or letter of Kemin's policies are subject to disciplinary action up to and including termination of employment in accordance with local

relevant law and contractual arrangements.

Kemin believes that the welfare of consumers is best served by economic competition. Consequently, Kemin competes vigorously for business and is committed to complying with the antitrust and competition laws of those jurisdictions where its products and services are manufactured and sold. Generally speaking, these laws prohibit practices that might unreasonably restrict competition. You are forbidden from entering into any anticompetitive agreements or understandings discussed or agreed to, formally or informally, expressed, or implied. There shall be no exchange of any information including but not limited to pricing data, cost data, terms or conditions, market allocations, maximum or minimum pricing or other information that will violate antitrust and competition laws. This provision of the Code is not intended as a comprehensive review of the antitrust laws and is not a substitute for expert advice. If any employee has questions concerning a specific situation, he or she should contact the Legal Department before taking action.

CONSULTANTS

All consultants hired by the Company must agree to adhere to the Code of Conduct and to sign a nondisclosure agreement. Such adherence and execution of a nondisclosure agreement shall be part of the consultant contract upon their signing for particular services.

OBTAINING COMPETITIVE INFORMATION

Information regarding Kemin's competitors is oftentimes useful in allowing us to better serve our customers. You can openly inquire about such information but shall never use subterfuge or use false pretenses in order to obtain such information.

INCORPORATION OF FIDUCIARY MANUAL

Kemin has issued a Fiduciary Manual pertaining to certain fiduciary, security, and employment items. This document is directed toward all employees who manage or use Company assets, have financial responsibility for Company funds, check writing or signing authority, petty cash oversight and disbursement authority, purchasing authority or who file expense reports. For these employees, the Fiduciary Manual is incorporated into the Code of Conduct. A copy of the Fiduciary Manual is attached to the Code of Conduct. If you are a manager at Kemin you are expected to communicate the relevant portions of the Fiduciary Manual to your staff so that the financial integrity of the Company is maintained in your business unit and across Kemin as a whole.

[Core Docs Fiduciary Manual \(2025, English\)](#) – click [here](#) to access

REPORTING VIOLATIONS OF THE CODE

The Code of Conduct is critical to the way that Kemin does business. You are required to immediately report any suspected violation of the Code of Conduct that is of a serious nature. Various levels of reporting have been noted within this Code. Generally, this means reporting violations to one's supervisor. If the violation continues, then reporting it to the next level of supervision is appropriate. When no action is taken, one should then report the violation to the local operating President or the Worldwide President or Chairman. In any case, regardless of what or to whom a report is made, no Kemin employee shall ever be penalized for such reporting. Retaliation against an individual who reports a code of conduct violation is strictly prohibited. Downgrading an employee's performance rating, limiting an employee's opportunities for assignments or advancement, excluding an employee from departmental functions, or any other types of retaliation must not be imposed on an employee as punishment for:

- Filing or responding to a good faith complaint, or
- Cooperating in an investigation

Acting in “good faith” means that you provide all of the information you have and believe you are giving a sincere and complete report. Individuals who take action against a person for making a report or participating in an investigation in good faith will be subject to disciplinary action, up to and including termination, as local law permits.

After reporting a violation to one’s supervisor and further up the responsibility chain, and the violation continues, you are also able to use Kemin’s Whistle Blower process to make an anonymous report. You have at least three options available to you: (a) Use the kemin.ethicspoint.com website from a computer or mobile phone (b) send an email to Auditor@Kemin.com, or (c) access one of the regional toll-free hotlines listed on the website (available in over 100 languages).

DISCIPLINE FOR CODE VIOLATIONS

If a violation of any section of this Code is determined, the offending employee will be subject to discipline, up to and including termination of employment.

PROTECTION OF PERSONAL INFORMATION

Kemin respects the privacy of its employees, customers and suppliers in a manner consistent with the law in all localities and Kemin’s current policies governing personally identifiable information or (sensitive) personal data.

For Non-European Union Employees:

From time-to-time Kemin has a need to transmit personally identifiable information over the Internet to facilitate its business. By signing the Code of Conduct you agree that Kemin may transmit certain personally identifiable information over the Internet. This information may include the following:

Name	Health records	Retirement account information
Address	Emergency contact information	Photos
Telephone numbers	Other insurance records	Family information if known
Resume	Payroll records	Other personnel records

For European Union Employees.

In order to comply with the law in the European Union, Employees are provided with the required information regarding the processing of their personal data in Kemin's Privacy Policy for Data Protection and Privacy for employees in the European Union, and adequate safeguards are put in place to allow the transfer of employee's personal information outside of the European Union through the use of EU standard contractual clauses.

Questions: Every employee may always apply for information to the Personnel Officer.

SIGNING THE CODE OF CONDUCT AGREEMENT

All employees, regardless of position, are required to sign the Code of Conduct within five days of starting employment.

As a condition of continued employment, employees will be required to sign the Code of Conduct Agreement yearly. New employees must sign the Code upon their hire.

It is the responsibility of each local Human Resources Manager to obtain all required signatures. The Human Resources Department shall keep all signed agreements on file. Any form disclosing a potential conflict of interest should be forwarded to the Worldwide President and Worldwide Human Resources Director for tracking purposes.

Employees should sign an official translated version of the Code if they are unable to fully understand and read the English version of the code. If a translation is necessary in a language other than those currently available (Spanish, Portuguese, Flemish, Chinese, Thai, and Tamil), an official translated version will be provided in cooperation with the local HR Manager. It is the responsibility of each local HR Manager to facilitate full written translations as required by employees to maximize their understanding of the Code. Employees should only sign official translations of the Code on file with the Worldwide HR Director.

Name of Employee: _____
(Printed in English)

CODE OF CONDUCT AGREEMENT YEARLY RENEWAL

Preliminary Statement

Kemin requires a level of professional ethics from all employees. The provisions in the Code are designed to maintain the commitment to excellence within our Mission, Vision and Value Statements.

In no way shall this agreement in part or as a whole be represented or construed as an employee contract. All employment is at will or in compliance with local law. This Code shall be governed by appropriate local employment law and employment contracts if such contracts have been executed. By signing this document, I agree to abide by its requirements and to immediately report to my supervisor any violation of this code by myself or other Kemin employees. A serious violation of this code can result in disciplinary action up to and including termination of employment.

Potential Conflicts of Interest

Potential conflicts of interest exist where a Kemin employee cannot make a work-related decision free of bias or the appearance of bias. A potential conflict may exist if you are aware that you or someone close to you (possibly a spouse, parent, child) is consulting, working for or investing in: (i) a Kemin business partner such as a vendor, supplier, distributor, sales agent, or customer; or (ii) a competitor or potential competitor. See pages 5-6 of this Code of Conduct for details.

ALL EMPLOYEES MUST CHOOSE ONE OF THESE TWO OPTIONS:

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I have no known potential, direct, or indirect conflicts. By signing this statement, I acknowledge that I am not currently engaged in any activity that may be or may be perceived to be in conflict with the interests of Kemin. Further, I agree that if at any time while in the employment of Kemin, I propose to acquire an interest or enter into a transaction or activity which may be in conflict with or raise a question under the statement, I will review the matter with my immediate supervisor or with an officer of the Company prior to engaging in the activity.

OR

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My potential, direct, or indirect conflicts are listed below. *(Include all applicable information such as individual's name and title, relationship, business name, etc.)* Use more pages, if necessary, to describe potential conflicts.

I have read and agree to comply with Kemin's Code of Conduct policy, revised as of **January 1, 2025**, a copy of which has been furnished to me. I further acknowledge that I will be required to sign this document and disclose any potential conflicts yearly while in employment with Kemin. If I am a manager of people, I will monitor for compliance with this Code of Conduct within my functional area and promptly report any violations for investigation.

Signature of Employee

Date

Signature of Local Operating President or Worldwide President

Date