



VanDeMark

Phosgene Chemistry – Custom Chemicals



VanDeMark Chemical Inc. Business Code of Conduct

Our Business Code of Conduct serves to guide the actions of our employees consistent with our Company core values of Ethics, Integrity, Community and Responsible Care®. It defines basic, globally applicable standards of conduct and what is expected from employees as members of VanDeMark Chemical Inc.

The continued success of VanDeMark Chemical Inc. is dependent upon our customers' trust and we are dedicated to preserving that trust. VanDeMark employees will conduct themselves in a way that will merit the continued trust and confidence of the public.

In general, the use of good judgment, based on high ethical principles, shall be the guide for our employees with respect to lines of acceptable conduct. VanDeMark is committed to Responsible Care® principles. We will not compromise on safety. Business considerations shall not take priority over safety, health and environmental protection.

Each employee is responsible for working safely at all times and must comply with all applicable environmental and occupational health and safety laws and regulations, as well as with the corresponding Company policies. All VanDeMark staff has the duty to instruct, supervise and support their team in adhering to this responsibility.



Confidentiality

Our clients and other parties with whom we do business entrust the company with important information relating to their businesses. It is our policy that all information considered confidential will not be disclosed to external parties or to employees without a "need to know."

All employees are required to sign a non-disclosure agreement as a condition of employment. If an employee questions whether certain information is considered confidential, they should first check with their immediate supervisor. This policy is intended to alert employees to the need for discretion at all times and is not intended to inhibit normal business communications.

Conflicts of Interest

Employees must avoid any relationship or activity that might impair, or even appear to impair, their ability to make objective and fair decisions when performing their jobs. Company property, information or business opportunities shall not be used for personal gain. Employees will not accept gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to all company employees.



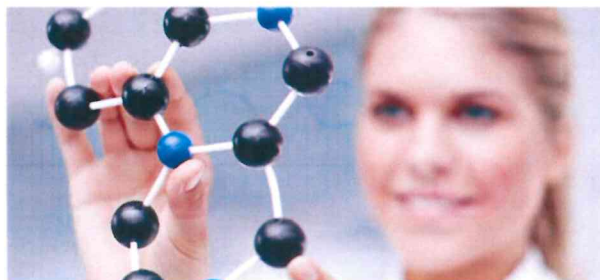
VanDeMark Suppliers

VanDeMark is committed to sustainability by applying the highest ethical standards through our supply chain. In support of this goal, our company requires adherence to the principles of the United Nations Global Compact as a mechanism for business sustainability.

Supplier Business Conduct

All dealings by VanDeMark with its business partners are executed on the basis of competitive prices, highest suitability and required quality. Suppliers with certifications such as ISO 14000, Responsible Care® or similar and with core values focused on sustainability shall be preferred.

Our suppliers' business behavior must be in compliance with all applicable international, national and local laws and contractual terms, as well as with all elements of this Code of Conduct. VanDeMark's Suppliers Code of Conduct shall also apply to third parties (sub-contractors) if the supplier has outsourced parts of their contractual obligations.



VanDeMark Chemical Inc. does not tolerate any discrimination, harassment or bullying on the basis of ethnicity, national origin, color, religion, sexual orientation, creed, age, sex, disability or any similar characteristic. Nor will VanDeMark Chemical Inc. engage in or support, directly or indirectly, child labor, or bonded or forced labor of any kind.

Supplier Health, Safety & Environmental Programs

Suppliers must provide a safe and healthy working environment. They must commit to having programs in place to operate and maintain all their operations in a safe manner, while ensuring that their activities have a minimal impact to the environment. Suppliers shall identify and assess possible emergency situations in the workplace and shall have programs in place to prevent or mitigate catastrophic releases of chemicals.

Jeff Davis
President & CEO
VanDeMark Chemical Inc.