

HUMAN RIGHTS POLICY

Geo Chem's commitment to respecting human rights wherever we operate is embodied in The Geo Chem Way, our Operational Excellence Management System and our Business Conduct and Ethics Code. Reflecting this commitment, Geo Chem adopted a new corporate Human Rights Policy in 2011. We believe that although governments have the primary duty to protect and ensure fulfillment of human rights, we have a responsibility to respect human rights and can play a positive role in the communities where we operate. To this end, our conduct in our global operations is consistent with the spirit and intent of the United Nations Universal Declaration of Human Rights; the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, where applicable to business; and other applicable international principles, including the Voluntary Principles on Security and Human Rights.

In many countries and communities where we operate, social issues are part of a broader set of complex socioeconomic and security concerns and can apply to many aspects of our business. This is why the management of human rights issues in Geo Chem is based on the totality of our efforts and not on a single activity. Our corporate policies, management processes and participation in voluntary initiatives are complementary and are intended to work together and reinforce our commitment to respecting human rights.

Geo Chem's Human Rights Policy will foster greater awareness of human rights issues throughout the company and will enhance our capabilities to identify and manage human rights issues in areas relevant to our business: employees, Security and suppliers. The policy also does the following:

- ❖ Reinforces our existing policies, processes and activities that support our human rights values and commitments, which include specific policies on labor relations, contracting and procurement, operational excellence.
- ❖ Identifies select new requirements for training and operations assessments specific to operating environments where human rights issues may be more prevalent.
- ❖ Sets clear accountability for line management to implement the policy and for our corporation's commitment to providing management with the necessary resources, support and review.

All employees of Geo Chem are required to comply with this policy, whose key elements are as follows.

- ❖ **Employees** We treat all of our employees with respect and dignity and promote diversity in the workplace. Our company policies and procedures adhere to all applicable domestic laws and are consistent with ILO core labor principles concerning freedom of association and collective bargaining, nondiscrimination, forced labor, and underage workers in the workplace.
- ❖ **Security** We protect personnel and assets and provide a secure environment in which business operations can successfully be conducted. Our guidelines and management processes on security in our areas of operations are consistent with the Voluntary Principles on Security and Human Rights.
- ❖ **Suppliers** We encourage our suppliers to treat their employees and to interact with communities in a manner that respects human rights and is consistent with the spirit and intent of this policy. We require that our key suppliers adhere to all applicable domestic laws and encourage them to be consistent with ILO core labor principles. We also engage with our key suppliers to reinforce awareness of potential human rights issues.