



Whistleblower Policy

December 2017

Ajay-SQM Group requires all directors, officers, and employees worldwide to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of Ajay-SQM Group, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

The objective of this Policy is to establish the channels to report or make complaints related to breaches of the Company's Code of Ethical Business Conduct and internal policies, the Antitrust and Competition Law Compliance Manual, the Anti-Bribery and Anti-Corruption Compliance Policy, and applicable laws.

Business Irregularities

Business irregularities can include, among others: fraud; deception; scam; bribe; forgery; extortion; corruption; financing terrorism; asset robbery and theft; unlawful appropriation of money, goods, or assets; collusion; material fact concealing; false representation; fraudulent financial disclosure; dishonesty; embezzlement; abuse of power; malicious application or interpretation of standards, policies, and internal controls of the Company; unlawful or malicious use of Company information; disclosure of confidential information; or use of Ajay-SQM Group resources to commit illegal acts or acts for personal benefit.

Reporting Responsibility

Ajay-SQM Group makes it mandatory for directors, officers, and employees to report or denounce business irregularities, in compliance with local applicable law. It is the responsibility of every employee to also report concerns about violations of the Code of Ethical Business Conduct or suspected violations of laws or regulations that govern Ajay-SQM Group's operations. Not to disclose an irregularity constitutes a serious violation and can be sanctioned. This Whistleblower Policy is intended to encourage and enable employees to raise concerns internally so that the Company can address and correct inappropriate conduct and actions. The requirement to report suspected or known violations should not be construed as preventing individuals from also reporting possible violations to appropriate government authorities.

The Denouncer must report all available information that they believe may be useful to carry out an investigation, such as: the nature of the breach, how the Denouncer learned of the breach, areas and/or persons involved, Ajay-SQM Group's money and/or assets affected, evidence, and, in general, any information that will aid in the investigation.

No Retaliation

It is against Ajay-SQM Group values for anyone to retaliate against any employee who in good faith reports an ethics violation or a suspected violation of law. No employee reporting an irregularity will be, in relation to this reporting, fired, suspended, demoted, harassed or intimidated, transferred against his will, denied a transfer or promotion, denied a reference or given a negative reference, or threatened with any of these actions, and therefore will not suffer any adverse change in his or her work conditions as a result of the report. Any employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment, in accordance to applicable labor laws.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be

false will be viewed as a serious disciplinary offense and may be subject to sanctions, as allowed under applicable labor legislations.

Confidentiality

Reports of violations or suspected violations will be kept confidential to the extent possible. This includes the information related to the report and the identity of the person reporting. If local laws allow, the person reporting also has the option of remaining anonymous, which shall be protected to the extent possible. In general, reports or complaints cannot be submitted anonymously in European countries.

Handling of Reported Violations

The Ajay-SQM Group Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. Whenever possible, the Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation.

The Compliance Officer will advise the Ethics & Compliance Committee and the Ethics & Compliance Oversight Council of all complaints. The Oversight Council is responsible for defining sanctions. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. In addition, the Compliance Officer shall keep a record of all complaints received, along with the measures that were taken.

Means to Report

To report a potential Business Irregularity, the formal reporting channels below may be used. Alternative means may also be used, such as reporting to a direct supervisor, other senior management, the Human Resources area, the Ethics and Compliance Oversight Council, and the Ethics and Compliance Committee. Reports submitted through these alternative means must then be reported to the Compliance Officer.

Formal reporting channels:

- Phone Number (direct line): +1 770 672 6212
- Regular Mail—Confidential letter, addressed to:
Ajay-SQM Group Compliance Officer
4000 Industry Road
Powder Springs, GA 30127
- Email Address: whistleblower@ajay-sqm.com
- Whistleblower Form on the company website: www.ajay-sqm.com/whistleblower