

SUPPLIER CODE OF CONDUCT

At Innophos, we strive to align ourselves with team members and partners who act in a socially, economically, environmentally, safe and responsible manner. We strive to develop long-lasting, trusting and mutually beneficial relationships with suppliers who share our strong values and who demonstrate the same commitment to operating responsibly and ethically across all facets of business. Therefore, Innophos is requiring compliance to its Supplier Code of Conduct (“Code of Conduct”) by all of its suppliers, including but not limited to, suppliers of raw and packaging materials, service providers, independent contractors and consultants (collectively, “Innophos Suppliers”). This Code of Conduct states the basic requirements we require of Innophos Suppliers as a condition of doing business with Innophos. Innophos Suppliers are required to understand and comply with this Code of Conduct at all times.

Innophos Suppliers will be expected to certify their compliance with this Code of Conduct at Innophos’ request, and to authorize Innophos and its designated agents (including any third parties) to engage in reasonable monitoring activities, including on-site inspections upon reasonable notice. When Innophos becomes aware of any actions or conditions not consistent with this Code of Conduct, such actions will be reviewed, and appropriate corrective measures will be implemented.

Guiding Principles

1. Legal Compliance

Innophos is committed to conducting its business in accordance with the highest ethical business standards and in compliance with applicable laws and regulations in the countries where we do business, including applicable environmental, health and safety laws and regulations. We require Innophos Suppliers to do the same. In cases where applicable law conflicts with the provisions in this Code of Conduct, Innophos Suppliers are expected to comply with the law, while seeking to meet the underlying tenets of each standard within this Code of Conduct. We also require Innophos Suppliers to monitor and immediately report any actual or apparent conflict of interest involving Innophos to ensure such issues are timely addressed in order that all goods and services provided to Innophos remain free of any conflicts of interest.

2. Human Rights

- **Freely Chosen Employment:** Innophos Suppliers will strictly prohibit any labor practices utilizing any forced, bonded, slave, indentured or involuntary prison labor.
- **Freedom of Association and Collective Bargaining:** Innophos Suppliers will respect their employees’ rights to freely join, organize or form labor unions and to bargain collectively, or refrain from doing so, in accordance with all applicable laws.
- **Child Labor:** Innophos Suppliers will not use any child labor under any circumstances. All Innophos Supplier workers meet the minimum age requirements in accordance with applicable local laws.
- **Minimum Wage, Hours and Benefits:** All compensation paid by Innophos Suppliers to its workers complies with all applicable wage laws, including those relating to minimum wage, working hour limits, overtime hours and legally mandated benefits.
- **Diversity and Nondiscrimination:** Like Innophos, Innophos Suppliers will provide an inclusive environment which encourages and values diversity. Innophos Suppliers will prohibit any unlawful discrimination against applicants for employment and employees

with respect to age, color, disability, medical condition, national origin, race, religion, sex, gender identity, gender expression, military or veteran status, or any other classification protected by applicable law.

- **Harassment Prohibition:** Innophos is committed to treating employees with respect and dignity and providing a workplace free of sexual harassment or other unlawful harassment and requires Innophos Suppliers to do the same with respect to their employees. Innophos Suppliers will also not allow any harsh or inhumane treatment of any of their employees, including any form of psychological, physical, sexual or verbal abuse, corporal punishment, or other forms of intimidation, or the threat of any such treatment.
- **Workplace Health and Safety:** Innophos operates its facilities and conducts business in a safe and secure business environment that protects the health and safety of all workers and the communities in which they operate. Innophos Suppliers will likewise create a culture of safety at their sites all over the world, and effectively work and train employees to prevent health and safety incidents and occupational injury and/or illness. Innophos Suppliers will also provide a safe and healthy environment that complies with all applicable laws pertaining to health and safety in the workplace.

3. Environmental Practices

Innophos Suppliers will conduct their operations in accordance with all applicable laws, rules and regulations pertaining to environmental protection. Innophos Suppliers will strive to continually improve their environmental footprint, including the promotion of sustainability initiatives such as energy and water conservation, pollution prevention, waste minimization, reuse, and recycling practices.

Ensuring the principles of sustainable development in our supply chain is important to us. You may acknowledge the principles stated above or demonstrate your commitment via compliance with your own code of conduct or company policies that embrace these standards. Innophos reserves the right to conduct audits or assessments to ensure your compliance and will take appropriate steps regarding our relationship with you if there is a reason for concern. Innophos reserves the right to discontinue any relationship for non-adherence to international principles, failure to correct violations, or displaying patterns of non-compliance with these standards. Should you have any concerns about illegal or improper conduct, please immediately report the conduct. You can anonymously report the conduct through our Ethics and Compliance Hotline, 1-800-461-9330/1-720-514-4400, or by completing and submitting a web form available at www.convercent.com/report.