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Transparency in Supply Chains Act Disclosure

The following disclosure is made pursuant to the California Transparency in Supply Chains Act (SB 657), which requires retailers and manufacturers to disclose their efforts, if any, to ensure their supply chains are free from slavery and human trafficking.

Chemtura is committed to fair employment practices and to following applicable employment laws wherever it has operations. As specified in our Code of Business Conduct, we are strongly committed to respecting and protecting basic human rights wherever we operate. In support of this commitment:

- We do not use child or forced labor in any of our global operations or facilities, regardless of whether such practices are prohibited in a particular jurisdiction.
- We are committed to fair labor practices, including in situations where we interact with labor unions; and
- We follow all applicable laws relating to minimum wage, overtime and maximum hour rules.

All Chemtura employees and suppliers are required to abide by these provisions. Additionally, the Code requires compliance with all applicable laws, including those prohibiting trafficking and forced labor.

Supplier Compliance

As a global corporation with manufacturing facilities in 11 countries, Chemtura is reliant on a vast network of suppliers. Chemtura expects everyone working with us or on our Company's behalf to abide by the principles embodied in our Code. Suppliers are also subject to our Purchase Order Terms and Conditions, which requires suppliers to comply with all applicable local, regional and national laws and regulatory requirements, including laws against slavery or trafficking. In the event a supplier violates the Code, Terms or an applicable law, Chemtura

reserves the right to either terminate its relationship with the supplier or to work with the supplier to implement any necessary corrective actions.

Due to the highly technical nature of our manufacturing process, we do not employ unskilled workers anywhere in our supply chain. Although we do not use formal verification procedures, supplier audits, or training programs specifically targeted at forced labor or trafficking, we believe that the specialized nature of our business makes the risks of such conduct in our supply chain extremely unlikely.

Internal Accountability

Our Code of Business Conduct applies to everyone at Chemtura—employees, officers and directors alike—and it embodies our commitment to ethical business practices, regardless of title or position. Chemtura takes Code violations very seriously; individuals who violate the Code are subject to disciplinary action, up to and including termination.

If an employee ever suspects a violation of the Code or the law, they are strongly encouraged to report it using any of the contact numbers listed in the front cover of the Code. In some locations, employees may also be subject to civil and criminal penalties for failing to report misconduct that they are aware of. Even when the misconduct is not unlawful, violations of our Code and company policy may still result in dismissal.

To ensure that our employees feel comfortable reporting violations without any fear of retaliation, we have also instituted a Resource Line, which anyone may call to submit anonymous complaints. Our Line is staffed by an outside company that can take calls in most languages, and is available 24 hours a day, 7 days a week. Resource Line staff are trained to handle reported violations confidentially and, if preferred, anonymously to the extent allowed under the law.