



Akzo Nobel's
**Code of
Conduct**
Who we are and
how we work



Letter from the Chairman



Dear employee,

The Akzo Nobel Business Principles make good business sense. They help us to stay successful as a company, today and in the future, as they help us to maintain our license to operate in the balance between people, profit and planet.

The Akzo Nobel Business Principles were introduced five years ago, and overall they have been a resounding success. We have trained employees worldwide, but of course this is not a one-time exercise. We continue to think and act according to the Business Principles on a daily basis. In order to help us maintain the focus on them in an ongoing fashion, I am pleased to present to you the Akzo Nobel Code of Conduct.

This Code is intended to provide you with a clear overview of the obligations that each employee in the Company needs to understand. In essence it captures not only the general Business Principles but also our key and relevant Company Directives. It thereby assists all of us in performing our jobs in accordance with the Company's standards.

As an employee you have a personal responsibility to be aware of the Code of Conduct and to comply with it. You need to know, therefore, that should you not live up to its requirements, Akzo Nobel will consider disciplinary action, including possible dismissal in cases of gross negligence. Since we completed the Business Principles rollout, we assume that you are already acting in accordance with them. If not, or if you are facing a situation that gives you any doubt as to how to act regarding this Code of Conduct, please contact your manager. Your manager will also be able to help you answer any questions about interpreting or applying this Code.

Furthermore, you should bring to the attention of management any activity which is in violation of Company policy or law. To this end Akzo Nobel has established a Complaints Procedure which can help you to determine the best way to raise your concerns. We are committed to providing the utmost protection to employees who report a breach or suspected breach of the Code. For absolute clarity: we also stress that senior management will not hold management or employees accountable for any loss of business resulting from compliance with the Code. I trust that you will support and comply with our Code of Conduct.

Our Code of Conduct is a reflection of who we are and how we work. I am therefore counting on each employee to fully embrace its content. In doing so, we can ensure that we continue to build a company we can all be proud of.

A handwritten signature in blue ink, appearing to read 'Hans Wijers'.

Hans Wijers,
CEO Akzo Nobel

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This Code of Conduct is not a contract of employment and does not change the nature of your employment (in the US: "At will").





1. Introduction

As an employee of Akzo Nobel you are expected to act in accordance with our company values and Business Principles and to comply with company policies, laws and regulations. The company Values and Business Principles are an expression of who we are and how we want to be perceived by our stakeholders. Laid down in company directives, policies and guidelines, they are intended to be put into practice by all employees on a daily basis.

This Code of Conduct contains an overview of key information, including the Business Principles and directives, which are relevant to all employees. The code is a statement of who we are and how we work. Whenever we encounter difficult ethical or legal issues, we need to resolve them in line with our code of conduct. This code is a living document and will therefore be updated when so required. As an employee you will always be notified when an update is made.

The key sections of this document cover:

- *Our Company*
- *Business Integrity*
- *Company Responsibilities*
- *Employee Responsibilities*

Furthermore, you should bring to the attention of management any activity which is in violation of company policy or law. To this end, Akzo Nobel has established a Complaints Procedure, which can help you to determine the best way to voice your concerns.

We are committed to providing full protection to employees who report a breach or suspected breach of the Code. For absolute clarity, we stress that senior management will not hold employees accountable for any loss of business resulting from compliance with this code.

Please be aware that in the event of a failure to comply with, or any willful breach of our Business Principles and Code of Conduct, the company will consider disciplinary action, up to and including termination of employment. Now that the Business Principles rollout has been completed, we assume all our employees are already acting in accordance with them.

If you have any questions about how to interpret or apply the Code, or any other company policies or directives, please consult your manager.

2. Our Company

2.1 Business Principles

As described in the Company Statement it is Akzo Nobel's ambition to be the first choice of customers, shareholders, and employees, and to be a respected member of society. In the spirit of the OECD Guidelines for Multinational Enterprises, this document sets out the core values that should underlie the conduct of all Akzo Nobel companies in order to fulfill our ambition. In this respect Akzo Nobel's Business Principles apply equally to our business transactions throughout the world and to the individual behavior of employees in conducting Akzo Nobel's business. The Business Principles also bring together the main Akzo Nobel responsibilities for other specific policy areas.

The Business Principles leave Business Unit Management and Country Management free to specify further local rules of business conduct provided such rules are consistent with our core values and with safeguarding Akzo Nobel's good reputation worldwide.

It is the responsibility of the Board of Management and each Business Unit Manager to ensure that Akzo Nobel's Business Principles are communicated to and observed by Akzo Nobel employees. In addition, Akzo Nobel regards the application of its Business Principles to be of prime importance in making decisions about whether or not to enter into or continue relationships with contractors and suppliers, and to participate in joint ventures.

2.1.1 Our values

We believe in:

- Focusing on our customers' future first
- Embracing entrepreneurial thinking
- Pragmatism in problem solving
- Courage and curiosity to question
- Integrity and responsibility in our actions

2.1.2 Responsibilities

Akzo Nobel is committed to creating long-term value for its customers, shareholders, employees, and society, recognizing that sustainable profit is essential for the continuity of its business.

We will focus our efforts on the success of our customers. In this respect it is our responsibility to provide customers with products and services that offer value in terms of price and quality, and that meet high health, safety, and environmental standards.

We will provide competitive returns on our shareholders' investments. In this respect it is our responsibility to take due account of the expectations of our investors.

We will create an attractive working environment for our employees. In this respect it is our responsibility to recruit, hire and promote employees solely on the basis of suitability for the job, to stimulate their individual and professional development, and to provide safe and healthy working conditions. It is also our responsibility to prohibit harassment or discrimination of any kind and exploitation of child labor.

We will conduct our activities in a socially responsible manner. In this respect we observe the laws of the countries in which we operate, support fundamental human rights in line with the legitimate role of business and give proper regard to health, safety, and the environment consistent with our commitment to contribute to sustainable development.

2.1.3 Free Enterprise

Akzo Nobel supports the principles of free enterprise and fair competition. The Company aims to meet customers' needs faster, better, and more distinctively than our competitors. To this end, Akzo Nobel will compete vigorously but fairly, and within the framework of applicable competition laws.

2.1.4 Business Integrity

Akzo Nobel insists on integrity and fairness in all aspects of its business operations.

- Bribery and any other form of unethical business practice are prohibited.
- Akzo Nobel employees are expected to avoid all situations in which their personal or financial interests may conflict with the Company's interest.

All business transactions shall be accurately and completely recorded in accordance with the Company's accounting principles and local laws and may be subject to audit.

2.1.5 Community activities

Akzo Nobel companies are encouraged to support community activities.

- Akzo Nobel companies are to give their employees the opportunity to play an active role in societal matters – for example, through community or educational programs – unless participation in these activities creates a conflict of interest.
- Akzo Nobel companies are not to make payments to political parties, or their institutions, agencies, or representatives.

2.1.6 Communication

Akzo Nobel recognizes that, in view of the Company's scope of activities, the impact they have on stakeholders, and the public role the Company fulfills, proper communication is essential. Subject to any overriding considerations of confidentiality, Akzo Nobel companies endeavor to communicate with others in an open, factual, and timely manner.

2.1.7 Compliance

The Board of Management will not hold Management accountable for any loss of business resulting from compliance with Akzo Nobel's Business Principles, and will see to it that no employee suffers as a consequence of reporting a breach or suspected breach of these principles.

2.2 The environment

Akzo Nobel protects the environment by preventing or minimizing the environmental impact of its activities and products through appropriate design, manufacturing, distribution and disposal practices.

Akzo Nobel expects all employees to play a role in protecting the environment. If an employee becomes aware of any violation of environmental law or any action that may appear to conceal such a violation, the employee should immediately report the matter to his or her manager or – if required, to Akzo Nobel's General Counsel via the Complaints Procedure.

Akzo Nobel seeks to extend its concern for health, safety and environment to its suppliers and customers through a Product Stewardship management system.

2.3 Community Support

Akzo Nobel supports activities in the communities in which its employees live and work. The Akzo Nobel Community Program provides the means to support such programs provided employees are personally involved. Employees are therefore encouraged to actively participate and propose projects to site management / site committees.

3. Business Integrity

3.1 Complying with laws

Akzo Nobel's policy is to comply with all laws and regulations that apply to its business. When conducting Akzo Nobel's business, employees may encounter a variety of legal issues, particularly in the areas described below. If there are questions on specific laws or regulations, contact Akzo Nobel Legal Affairs.

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All business transactions shall be accurately and completely recorded in accordance with the Company's accounting principles and local laws and may be subject to audit.

3.3.1 Competition Law Compliance

Akzo Nobel will compete for business. Akzo Nobel expects its employees to compete lawfully and ethically as well. Akzo Nobel operates a strict policy to ensure that its operations around the world are in full compliance with all applicable competition laws and the Akzo Nobel Competition Law Compliance Policy.

3.3.2 Dealing with suppliers

Akzo Nobel wants to do businesses with business partners who endorse our ethical values and our social and environmental standards as formulated in our Business Principles. Akzo Nobel regards the application of its Business Principles of prime importance in decisions to enter into or to continue relationships with suppliers and contractors.

3.3.3 Payments

3.3.3.1 Bribery

Bribery and any other form of unethical business practice are prohibited. Under no circumstance shall any Akzo Nobel officer, employee, agent or representative make, offer, promise or authorize any payment or gift...

- ...to gain any business advantage
- ...to influence the policy of any government or
- ...that could bear the appearance of impropriety.

Please understand that an offer alone, without actual payment, still violates Akzo Nobel's Policy and the law.

3.3.3.2 Commission payments

The rule prohibiting bribes of any form may not be circumvented by commission payments. Any commission payment should be justified by a clear and traceable service rendered to Akzo Nobel. The remuneration of agents, distributors and commissioners cannot exceed normal business rates and practices. Government officials shall not be appointed by Akzo Nobel as agents, distributors or commissioners.

3.3.3.3 Facilitation payments

Facilitation payments are small payments made in money or in kind (for example Akzo Nobel products) to officials in accordance with publicly-known or widely-followed local custom to expedite performance of routine government action, such as processing a required government license. Akzo Nobel promotes measures to eliminate such practices. At all events, applicable laws and regulations should be complied with, which in some countries completely rule out the making of facilitation payments.

For clarification as to whether a particular payment constitutes a facilitation payment and whether the payment is legally allowed, please consult Akzo Nobel Legal Affairs.

3.3.3.4 Recording of payments

All payments, including facilitation payments, must be recorded in the appropriate ledgers in accordance with the Company's accounting principles and all applicable local laws. Secret accounts and/or bookkeeping outside Company accounts are strictly forbidden. No payments will be channeled through an agent unless they form part of normal agency fees or reimbursement for incurred costs. Apart from petty cash transactions, cash payments to third parties are not permitted; all payments should be made to a bank account designated in writing. Payments to so-called numbered accounts are not permitted. A request by a contract partner to divert a payment to an entity or person offshore shall always be rejected. All payments will be subject to internal and external audit.

All financial transactions must be recorded in a timely and accurate manner. In addition, any information material to a transaction must be recorded. Akzo Nobel's records should reflect transactions in conformity with accepted accounting standards and should be designed to prevent off-the-books transactions such as kickbacks and bribes. Accordingly, Company employees must follow all applicable standards, principles and laws for accounting and financial reporting. No employee should establish an undisclosed or unrecorded account on behalf of the Company for any purpose. In addition, false or artificial entries are not to be made in the books and records of Akzo Nobel for any reason.

3.3.4 Money laundering

Akzo Nobel will not enter into nor tolerate any arrangement which facilitates (or which appears to or is suspected to be used to facilitate) any acquisition, retention, use, or control of any property or money intended to disguise the proceeds of crime.

3.3.5 Gifts

No personal gifts or favors of any material commercial value can be made to or accepted from a third party. A gift or favor of material value is defined as an object with such a value that it may influence a buying decision and/or may lead to a relation of dependency. In case of any doubt, a superior has to be consulted.

In every unit/department of the Company, there must be full transparency between subordinate and superior with respect to business gifts.



3.4 Fraud, deception or irregular conduct

Anyone who detects or suspects a case of fraud, deception, or irregular conduct shall immediately inform the superior of the directly responsible manager. The mandatory action for this superior is to contact the Group Auditor of Internal Auditing Service (AUD) to determine the action required.

Definitions:

- Fraud – the deliberate misappropriation, falsification, omission, or removal of data, money and/or goods whereby resources or assets are unlawfully diverted from or to the Company.
- Deception or irregular conduct – the deliberate providing with incorrect and/or incomplete and/or unclear information, or the violation of the contract of employment, the Corporate Directives or other rules in ways not included under fraud, with the result that financial information and/or decision-making is improperly influenced or affected.

3.5 Presence in high risk countries

Akzo Nobel is of the opinion that our activities provide the opportunity to improve the living standards and welfare of a broad cross-section of the communities in which we operate. It is one of our Business Principles that we will support fundamental human rights in line with the legitimate role of business.

- No one other than the Board of Management decides upon the foundation of a company (new legal entity), which includes direct entries into countries where Akzo Nobel has no presence.
- Akzo Nobel Business Units must comply with economic sanctions imposed by the UN. The conditions and timeframe for withdrawal from such a country have to be decided by the Board of Management. (In exceptional cases – usually after dialogue with stakeholders – the Board of Management might decide that our presence in such a high risk country remains justified for the good of the population).

Business units and service units operating in high risk countries must consider the questions in the self-assessment tool on Intranet. The aim of the self-assessment is to make business units and service units aware of the human rights impact of their operations. If a negative impact seems possible or likely, they are encouraged to take precautions and/or find solutions that are beneficial for employees and the communities in which they operate.

3.6 Child labor

Child labor refers to a type and intensity of work that hampers children's access to education, damages their physical and/or psychological health and their development within their families, and deprives them of their childhood or their self-respect. Therefore Akzo Nobel employees need to adhere to the following:

- Akzo Nobel adheres to the legal minimum age requirements in all countries in which the Company is active.
- Moreover, in adhering to the International Labor Organization's (ILO) Convention 138 "Minimum Age", and Convention 182 "Ban of Worst Forms of Child Labor", Akzo Nobel does not employ children under the age of 16.
- If children between age 16 and 18 are employed, the Company ensures that this work does not affect or preclude schooling.
- Business unit management is responsible for making the Akzo Nobel standards with regard to child labor known to key suppliers and contractors.

3.7 Forced labor

Akzo Nobel will under no circumstances make use of forced labor. Akzo Nobel will only employ employees who are working of their own free will. No employee is required to lodge deposits or will be deprived of identity papers upon commencing employment with the Company. Business unit management is responsible for making the Akzo Nobel standards with regard to forced labor known to key suppliers and contractors.



4. Company Responsibilities

4.1 Open communication

Openness, integrity, and reliability foster open two-way communication between employee and superior on all aspects of the working environment. In principle, all employees are encouraged to discuss such matters with their immediate supervisor or, when communication with the immediate supervisor is constrained, with the direct supervisor's manager.

Where the communication through the employee's hierarchical line may not be a viable option any employee may use the Company Complaints Procedure to highlight the issue to senior management.

4.2 Equal opportunity

We are committed to an attractive working environment for our employees. In this respect it is our responsibility to recruit, hire and promote employees solely on the basis of suitability for the job, to stimulate their individual and professional development, and to provide safe and healthy working conditions. It is also our responsibility to prohibit harassment of any kind and exploitation of child labor.

Our employees must be recruited, selected, and promoted on the basis of objective and non-discriminatory criteria. No harassment or discrimination of any kind will be tolerated, such as discrimination based on race, color, sex, or religion.

In the case of disability or chronic illness, including HIV/AIDS, employees should be able to work for as long as medically fit in available, appropriate work, avoiding prejudice and discrimination in the process. Disability and chronic illness (including HIV/AIDS) is not cause for termination of employment. In all circumstances, employees should be allowed to retain their employment in so far as they are able to fulfill the requirements of available and appropriate work.

Akzo Nobel's managers are expected to possess the flexibility to act with due regard for existing differences in individual quality, personal ambition, national culture, and organizational interest. They should feel challenged to manage such differences.

4.3 Healthy work environment

Akzo Nobel provides safe and healthy working conditions in order to prevent harm to and promote the health of all employees and other stakeholders. In order to do so, health and safety programs, rules, and regulations apply at all sites. It is the responsibility of each employee to comply with health and safety regulations.

Akzo Nobel will do what is in its power to prevent any injuries at work both for our own employees and our contractors.

Beyond this, the Company seeks to adapt work to the capabilities of all employees in relation to their physical and mental health. Care and support should be integral to the response to employees with chronic disability or chronic illness. All employees should have access to affordable health services. In areas with a high prevalence of HIV/AIDS, access to voluntary and anonymous counseling and testing should be encouraged and supported.

4.3.1 Disclosure of medical information

There is no justification for asking job applicants or employees to disclose personal medical information (e.g. pre-employment HIV testing) beyond the medical data required to ensure suitability for the job. All personal medical information is treated as confidential.

4.4 Right to organize

Akzo Nobel recognizes the freedom of employees to establish or join an organization of their choice (including trade unions) and will respect this right. Akzo Nobel will not make the employment of a worker subject to the condition that he/she shall not join a union or shall relinquish trade union membership. Akzo Nobel will not dismiss or otherwise prejudice a worker for the mere reason of trade union membership.

4.5 Collective bargaining

Akzo Nobel respects, within the framework of applicable laws, regulations, prevailing labor relations and employment practices, the right to be represented by trade unions and other employee organizations. Akzo Nobel will engage in the negotiation/consultation process either on its own behalf or through employers associations when ever applicable. Local rights and co-determination will be fully respected with a view to reaching agreement on employment terms and conditions.

4.6 Participation in political life

Akzo Nobel encourages its employees to play an active role in society, including activities in political parties and standing for election to public office.

Akzo Nobel companies are not to make any payments or donations in kind to political parties or their institutions, agencies or representatives. Akzo Nobel companies will also not facilitate political donations by employee action committees.

4.7 Protection of personal data

Akzo Nobel recognizes the importance of protecting personal data and has committed itself to a global Privacy Code of Conduct. As an employee, you are encouraged to read the Privacy Code of Conduct. Akzo Nobel shall only process personal data for specified purposes and in line with the provisions of the Privacy Code of Conduct. Personal data will include name, home address, social security number, performance appraisal data (P&D Dialog), etc.

4.8 Performance & Development Dialog

The Performance & Development Dialog (P&D Dialog) is Akzo Nobel's performance appraisal program. It supports our global business with a common process, terminology, and tools, and focuses all employees and managers on an ongoing dialog on performance and development. The use of this program is part of our culture and a responsibility of all employees.



5. Employee Responsibilities

5.1 Media relations and disclosures

To ensure a uniform level of information – to our shareholders for example – and to protect commercially sensitive information, financial details released to the media should never exceed the level of detail provided in Akzo Nobel's quarterly and annual reports or official statements issued at the presentation of these figures.

Additional, more specific financial information to be released by business units and/or national organizations must first be approved by the Responsible Member of the Board of Management.

As regards topics such as financial performance, acquisitions, divestments, joint ventures and major investments (more than EUR 10 million), no information should be released to the press without prior consultation with Corporate Communications.

Contacts with media about (social, environmental, financial, etc) issues that may affect the image of the Company should be brought to the attention of or discussed with Corporate Communications beforehand to avoid conflicting messages on behalf of the Company.

Employees need to refrain from statements that might make third parties capable of "insider trading" on the stock market.

5.2 Inside information

Akzo Nobel employees may become aware of information about Akzo Nobel or other companies that has not been made public. The use of such non-public or "inside" information about Akzo Nobel or another company other than in the normal performance of one's work, profession or position is unethical and may also be a violation of law. In most jurisdictions it is unlawful for any person who has "material" non-public information about a company to trade the stock or other securities of such company, including options, puts, calls, and any derivatives, or to disclose such information to others who may trade. Violation of such laws may result in civil and criminal penalties and other sanctions. Akzo Nobel will not tolerate the improper use of inside information regardless of whether it is unlawful or not.

Inside information may be share price sensitive. Share price sensitive information is information about a listed company's results of operations or other affairs that would, if generally known, be expected to have an impact on such company's share price. This information is illustrated by, but not limited to the following examples:

- Information on earnings
- Merger and acquisition deals
- New products with potentially important corporate/financial impact
- Letters received from government agencies (such as the FDA) with a potential/qualified impact
- Changes in control or management
- Changes in auditors or their opinion
- Events regarding securities (stock split, etc.)
- Bankruptcies
- Litigation

Akzo Nobel employees becoming aware of information which might be price sensitive with respect to Akzo Nobel's stock, have to make sure that such information is treated strictly confidentially and not disclosed to any Akzo Nobel colleagues or to third parties other than on a strict need-to-know-basis. In the case of disclosure to third parties (e.g. advisors to Akzo Nobel), disclosure is only permitted if such third parties, by law or contract, are bound by appropriate non-disclosure and non-use restrictions. In addition, potentially price sensitive information pertaining to Akzo Nobel's stock must be brought promptly to the attention of the Akzo Nobel Disclosure Committee, which will advise the Board of Management on the need for public disclosure. Only the Board of Management will decide on such disclosure. In case of doubt, seek contact with the Chairman of the Disclosure Committee. For practical purposes, it is noted that the same obligations apply to the securities of a third party with respect to which Akzo Nobel employees have inside information.

Any violations or unintended deviations from this directive must be reported without delay to the Chairman of the Disclosure Committee.

5.3 Corporate identity

To ensure a consistent and effective corporate identity approach worldwide, the rules published in the Akzo Nobel Corporate Identity Manual should be strictly adhered to. It should also be noted that these rules are different for certain product groups, companies and business units.

Any deviations from the corporate identity rules must be submitted to the Akzo Nobel Corporate Communications department for approval before being implemented.

5.4 Protecting Akzo Nobel's intellectual property

Akzo Nobel has acquired and developed valuable intellectual property, including patents, trademarks, copyrighted works, and trade secrets (e.g. confidential technical or business information). Employees have a responsibility to protect these assets.

Management may choose to protect inventions or creative expressions through patents, trademark registrations, or copyright. The transfer of patents, trademarks, or copyrighted works is subject to management approval and contractual safeguards.

Employees should only disclose confidential information on a need-to-know basis and take measures to avoid unauthorized disclosure, e.g. by securing access to confidential company records. Disclosing confidential information to third parties is subject to management approval and a non-disclosure agreement. Ideas or confidential information from third parties should not be received or used unless the appropriate safeguards are in place.

Akzo Nobel Intellectual Property must be involved in any transfer or dispute related to intellectual property. In any event, no statement regarding the validity, scope, or enforceability of intellectual property rights should be made without the involvement of Akzo Nobel Intellectual Property.

5.5 Internet use / IT Code of Conduct

As a general rule, all IT related resources and facilities are provided only for internal use and/or business-related matters, not for personal use. IT facilities which have been provided to employees should never be used for personal gain or profit, should not be misused during work time, and remain the property of Akzo Nobel. Disclosure or dissemination of confidential or proprietary information regarding Akzo Nobel, its products, or its customers outside the official communication structures is strictly prohibited.

IT related resources and facilities should not be used in any way that is unethical or illegal, or that could embarrass, defame, misrepresent, or convey an unjust or unfavorable impression of Akzo Nobel or its business affairs, employees, suppliers, customers, competitors, or stakeholders. Unauthorized access to information and information systems is prohibited; access must be authorized by the owners of the information and in line with the user's job description.

Information systems can be secured by personal passwords and/or additional authentication means like hardware tokens; users must use these in a responsible way, keeping them personal and securing them against misuse. Any installation, change, removal, or personal use of software provided by Akzo Nobel or available on Akzo Nobel Information Systems must be authorized and managed by the Information Management organization or a delegated party.

In order to prevent theft, loss, or unauthorized use of information and systems a user has to take measures to insure the physical security of hardware provided such as laptops, phones, tokens, USB sticks, etc. To protect the availability of company data, users have to secure relevant business information in a timely manner, by making back-ups or storing data on network drives.

Information Security related incidents or violation of Information Security principles must be reported to the local IT Helpdesk or Information Security contact. Possible evidence should not be tampered with. Every employee of Akzo Nobel is required to be familiar with and to comply with the Information Security rules and procedures applicable to his or her specific department and site, as communicated by the local Information Security contact.

Akzo Nobel reserves the right to review the activities performed by the user using company-provided IT facilities. In such cases, line management will be asked for authorization, local employee representatives will be informed where applicable, and local law will be observed at all times.

5.6 Business travel

5.6.1 Safety while traveling

The safety of employees while on a Business Trip is of vital importance to Akzo Nobel. The company publishes an updated list of those countries where travel may be hazardous for health or security reasons, and encourages the traveler and his/her supervisor to exercise good judgment when determining whether travel to a high-risk area is necessary.

5.6.2 Combining Business Trips with personal matters

It is not permitted to combine Business Trips with a vacation or to take along spouse, partner, relative, or friend without the prior written authorization from the general manager of the business or service unit.

5.6.3 Air travel

Continental flights

Continental flights are generally to be made in the lowest available class. Managers of business units, service units and country organizations are free to issue guidelines to allow business class for flights with a duration of more than six consecutive hours.

Intercontinental flights

Business class or equivalent is the highest class allowed. Exceptions to this rule require prior approval from the responsible Board member.

5.6.4 Hotels

Akzo Nobel has contracted a number of preferred hotel chains in major cities where Akzo Nobel regularly conducts business. Travelers must use these preferred hotels when available.

5.6.5 Travel by own car

A private car can only be used for a Business Trip if the owner's car insurance is adequate. The maximum distance for a Business Trip with a private car is 500 km one way and the costs will not exceed the lowest possible airfare and /or high-speed train fare, depending on the destination. Moreover, personal safety has to be taken into account at all times.

5.6.6 Train

For travel by train, tickets can be booked first class.

5.6.7 Reference

The Akzo Nobel business travel website (part of the Purchasing Portal website on the Intranet) provides most travel information. Additional information is available from Akzo Nobel Global Travel Management at Akzo Nobel Sourcing in The Netherlands.

5.6.8 Security

The Board of Management shall decide upon restrictions in business travel for all employees and/or measures to be taken to safeguard the safety of expatriates and their families in situations of political instability or other threats to public security (e.g. acts of terrorism).

The Secretary of the Board of Management shall communicate such restrictions and/or measures to business unit managers, service unit managers, corporate staff, and managers of country organizations. These managers shall be responsible for further information in their organizations and for the implementation of measures.

5.7 Substance abuse

Substance abuse can have devastating consequences in general, at any work place and especially at a production site. Therefore the use of any illegal drugs on Akzo Nobel premises is strictly forbidden. Illegal drugs include all drugs except prescribed and over-the-counter drugs that have been legally obtained and used only for the purpose for which they were intended.

Akzo Nobel strongly encourages as well a business environment free of alcohol, and on many Akzo Nobel sites the use of alcoholic beverages is banned altogether. Management can allow the moderate consumption of alcohol for internal or external events following local customs and practices.

Employees who violate this policy may be subject to disciplinary action.

Akzo Nobel will attempt to help employees with drug-related problems. The nature of that help may vary and will also require the cooperation of the concerned employee.