

Conflict of Interest

Purpose

At AkzoNobel, we each have a responsibility to make decisions in the company's best interest and to ensure that we base our dealings with business partners on objective decisions, not influenced by a potential Conflict of Interest.

These rules must be followed to ensure that we conduct business fairly, transparently, with integrity and in compliance with applicable laws and regulations as well as AkzoNobel's core values and standards. In case of conflict, the most stringent standard applies.

1 What is a Conflict of Interest?

A Conflict of Interest is a situation in which our personal interests are, or appear to be misaligned with AkzoNobel's business interests.

- a. Examples or types of Conflict of Interest are set out below. This is not an exhaustive list of possible Conflicts of Interest:
- Engaging in a second job, business or activity, whether full time or part time, outside AkzoNobel ("Position" type).
 - Our [1] Relative offers their company's products or services to AkzoNobel ("Position" type).
 - Referring a [1] Relative to work for AkzoNobel in the same unit or department ("Position" type).
 - Our [1] Relative is our direct report or vice-versa ("Position" type).
 - We (or our [1] Relative) have a financial investment in a supplier, competitor, or customer of AkzoNobel. "Financial investment" exists if we (or our Relative) own more than 1% of the outstanding capital of a business, and/or the investment represents more than 5% of our (or our [1] Relative's) total assets ("Share Interest" type).
 - Our [1] Relative works for a supplier, competitor or customer of AkzoNobel ("Share Interest" type).
 - We or our [1] Relative have a seat on the Board of Directors in a supplier, competitor, or customer of AkzoNobel ("Share Interest" type).
 - Sharing AkzoNobel commercially sensitive information with any unauthorized third party, including our [1] Relative, who works for a supplier, competitor, or customer of AkzoNobel ("Other").
 - Putting a supplier (and/or its employees) in a position which would allow the supplier to obtain commercially sensitive information of supplier's competitor.

2 What to do when faced with a Conflict of Interest?

- a. When there is a “Conflict of Interest” between AkzoNobel’s and our personal interests (or our [\[1\] Relative’s](#), close friends; and/or personal business partners), we must always act in **Error! Reference source not found.** AkzoNobel’s best interest includes AkzoNobel’s business, financial and reputational interests as well as its safety, integrity and sustainability interests.
- b. We must be transparent even for an apparent, perceived, or potential Conflict of Interest.

3 Definitions

[1] “Relatives” are any family member (whether through blood, adoptive/foster or other legally recognized relationships) such as spouse, domestic partner, parent, grandparent, child, grandchild, sibling, in-law, aunt, uncle, niece, nephew, cousin, step-relatives; others residing in your household.