



**Chemours™**

# **Speak Up Policy**

**Public**

## 1. INTRODUCTION

At Chemours we all have a responsibility to protect our culture of integrity. The Chemours Company (“Chemours”), its subsidiaries, affiliates, partnerships, joint ventures, and other business associations that are controlled by Chemours, directly or indirectly (collectively the “Company”), are committed to complying with the laws of all the countries where we do business and adhering to the Company’s Code of Conduct (the “Code”). We do this to ensure that business is conducted ethically, and that the Company’s financial information is accurate.

The purpose of this Speak Up Policy (the “Policy”) is to help promote the highest ethical standards. To that end, the Company maintains a workplace that encourages and facilitates the reporting of potential violations of our Code, Company policies, and applicable laws or regulations. Employees and all third parties working on behalf of Chemours, including consultants, distributors, vendors, contractors, and subcontractors (collectively, “Third Parties”), may raise concerns regarding such potential violations easily without fear of retaliation.

## 2. SCOPE

This Policy applies to communications made in good faith by employees and Third Parties through any of the reporting avenues listed in Section 4 that relate to any alleged violation of our Code, Company policies, or applicable laws or regulations (“Reports”).

## 3. AUTHORITY AND RESPONSIBILITY

- A. Audit Committee of the Board of Directors. Responsible for reviewing and approving this Policy. Receives quarterly reports on ethics-related incidents from the Chemours Ethics & Compliance team.
- B. Ethics & Compliance (“E&C”). Manages the Chemours Ethics Hotline and is a primary resource to whom employees can make Reports or otherwise speak up. E&C is responsible for ensuring that reported concerns are escalated and, if necessary or appropriate, investigated promptly and appropriately, and reported to the Audit Committee of the Board of Directors, as warranted. As needed, E&C may seek the assistance of internal and external resources to fulfill its responsibilities under the Policy.
- C. Ethics Champions. Specifically identified employees within the Company who are trained to provide support to colleagues in receiving and appropriately escalating reported concerns, and assisting E&C, when requested, in addressing Reports.
- D. Managers. Responsible for escalating Reports or other known concerns pursuant to this Policy and the Code. Managers are not responsible for investigating concerns, unless instructed otherwise. Managers may receive Reports under this Policy, support investigations and must comply at all times with the Chemours Non-Retaliation Policy, ensuring a workplace that fosters a speak up environment.

- E. Employees. All employees are expected to speak up and cooperate fully and truthfully throughout the reporting and investigation process including maintaining confidentiality so as not to interfere or affect the ability of the Company to perform a full and fair investigation.
- F. Human Resources. A specially trained and qualified team of employees who manage employee-related matters at Chemours. Human Resources has a duty to escalate actual or alleged violations of the Code, Company policies, and applicable laws or regulations to E&C.

You may fall into multiple categories listed above based on your role in the organization.

#### 4. POLICY STATEMENTS

##### A. Our Responsibility to Report

Everyone must be prepared to say something if violations of our Code, Company policies or of any applicable laws or regulations are known, seen or reasonably suspected.

It is the policy of the Company that when you reasonably suspect that a violation of our Code, Company policies or any applicable laws or regulations has occurred or is occurring, you must report it. These possible violations include, but are not limited to, accounting or financial reporting violations, misuse or misappropriation of Company property, conflicts of interest, bribery, or violations of the Non-Retaliation Policy. Consult the Company's Code for a more detailed description of Chemours ethical expectations and other areas that warrant reporting.

Speaking up using the reporting avenues available to you at Chemours is crucial for early detection, proper investigation, remediation, and deterrence of violations of our Code, Company policies, or applicable laws or regulations.

Misuse of reporting avenues, reporting not in good faith, or submitting false Reports will be addressed with appropriate disciplinary action up to and including termination of employment.

##### B. How to Report

At Chemours, no one is expected to face an ethical concern alone. The Company has many avenues for reporting your concerns regarding potential violations of our Code, Company policies, or laws and regulations. To ensure your concern is appropriately addressed, please use one of these avenues for reporting.

- The Chemours Ethics Hotline
- A Manager
- Your HR representative
- A member of the Chemours Ethics & Compliance team
- Your Ethics Champion
- A member of the Chemours Legal team
- A member of the Chemours Assurance Services team

The Chemours Ethics Hotline is:

- Operated by an independent company
- Open 24 hours a day, seven days a week
- Available in multiple languages

You may contact the Ethics Hotline anonymously. Reports will be kept confidential to the fullest extent possible consistent with the law and good business practices.

Ethics Hotline (US & Canada): 1 844 499 4607

For countries outside of the US or to submit your concern online, [click here](#)

Other feedback mechanisms that the Company provides (e.g., suggestion boxes, employee surveys, etc.) are designed to collect information and are ***not*** designed to address Reports of potential violations of our Code, Company policies, or any applicable laws or regulations. For the most direct attention to concerns raised by you, utilize the reporting avenues identified above.

While Chemours encourages employees and Third Parties to report concerns internally, thereby alerting the Company to potential misconduct and allowing Chemours to address issues and possible deficiencies in a timely manner (including self-reporting to government authorities if necessary), nothing in this Policy or any other agreement or policy should be construed to discourage or impede anyone from reporting concerns directly to applicable government authorities through available whistleblower processes including any employee's ability to: (i) file a charge or complaint with any federal, state or local governmental agency or commission (a "Government Agency"), including without limitation, the Equal Employment Opportunity Commission, the National Labor Relations Board or the Securities and Exchange Commission; (ii) communicate with any Government Agency or otherwise participate in any investigation or proceeding that may be conducted by any Government Agency, including by providing non-privileged documents or information; or (iii) testify truthfully in a legal proceeding. Any such communications and disclosures must not violate applicable law and the information disclosed must not have been obtained through a communication that was subject to the attorney-client privilege (unless disclosure of that information would otherwise be permitted consistent with such privilege or applicable law).

### C. Investigation after You Report

Chemours will investigate allegations to determine whether there has been a violation of our Code, Company policies, or applicable laws or regulations. The nature and scope of the investigation will be determined by the Company.

All investigations are to be conducted in accordance with the Chemours Investigation Policy<sup>1</sup> and in compliance with all applicable laws, regulations, our Code, and Chemours' values, including respect for the parties involved. As a safeguard to ensure the proper management of each investigation, no person other than the designated and assigned investigators should assume the responsibility of an investigation.

<sup>1</sup> The Chemours Investigation Policy is available and only applicable to those who are conducting investigations on behalf of the Company.

The Company endeavors to keep information disclosed during the course of an investigation confidential, except as necessary to effectively conduct an investigation, respond to regulatory or governmental requests or inquiries, or as required by law. When requested, everyone working for or with the Company has a duty to fully cooperate in the investigation. Failure to cooperate in an investigation, or deliberately providing false information during an investigation, may be the basis for disciplinary action, including termination of employment or your contract with the Company.

If, at the conclusion of its investigation, the Company determines that a violation has occurred, the Company will take effective remedial action commensurate with the nature of the offense, up to and including termination of employment. Reasonable and necessary steps will also be taken to prevent any further violations of Company policy or applicable laws or regulations. In order to preserve confidentiality, parties involved in the matter may not be informed about the outcome of the investigation.

#### D. Retaliation is Not Tolerated

We do not tolerate threats, intimidation, or retaliation against anyone who in good faith raises a concern or reports suspected misconduct. Retaliation includes adverse actions, harassment, or discrimination in your employment relating to your reporting of a suspected violation.

No one may take any adverse action against any employee or Third Party for in good faith complaining about, reporting, or participating or assisting in the investigation of, a reasonably suspected violation of our Code, Company policies, or applicable laws and regulations. The Company takes reports of such retaliation seriously. Incidents of retaliation against any employee reporting a violation or participating in the investigation of a reasonably suspected violation will result in appropriate disciplinary action against anyone responsible, including possible termination of employment. Those working for or with the Company who engage in retaliation against reporting employees may also be subject to civil, criminal and administrative penalties.

#### E. Exceptions

We are all expected to speak up without exception, unless restricted to do so by law.

## 5. DEFINITIONS

- A. Good faith. The person reporting must have a reasonable belief that the statements provided in support of a concern are truthful, based on the existing information, and are not intended to harass.
- B. Retaliation. Any action, statement, or behavior that is designed to punish another person for filing a Report, cooperating with an investigation, seeking guidance about a concern, or to deter someone from taking such action. Retaliation includes, but is not limited to, intimidation, adverse employment action against an employee, such as termination, demotion, transfer, or suspension, as well as threats of such actions.

- C. Report. Communications made through the reporting avenues listed in Section 4 of this Policy.
- D. Investigation. The process of addressing a reported potential violation of applicable law, regulation, Chemours Code or other Company policies. This process includes fact gathering such as asking questions and obtaining documentation for the purpose of determining whether a violation has occurred, or whether the Company, through its employees, Third Parties or Board of Directors, violated the Code, Company policies, or applicable laws and regulations. An investigation may be by an internal investigation team or an external team, or a combination of both, including outside counsel who may conduct a privileged investigation for the purpose of providing legal advice.

**6. ADDITIONAL RESOURCES**

Questions and clarifications regarding this Policy should be directed to the Ethics & Compliance team.

- [Chemours Code of Conduct](#)
- [Chemours Investigation Policy](#)
- [Chemours Non-Retaliation Policy](#)

**7. REVISION HISTORY**

Revision	Approval Date	Nature of Change
Original Issue	9-9-2024	