



enviri
**CODE OF
CONDUCT**
YOUR COMMITMENT
TO INTEGRITY

enviri



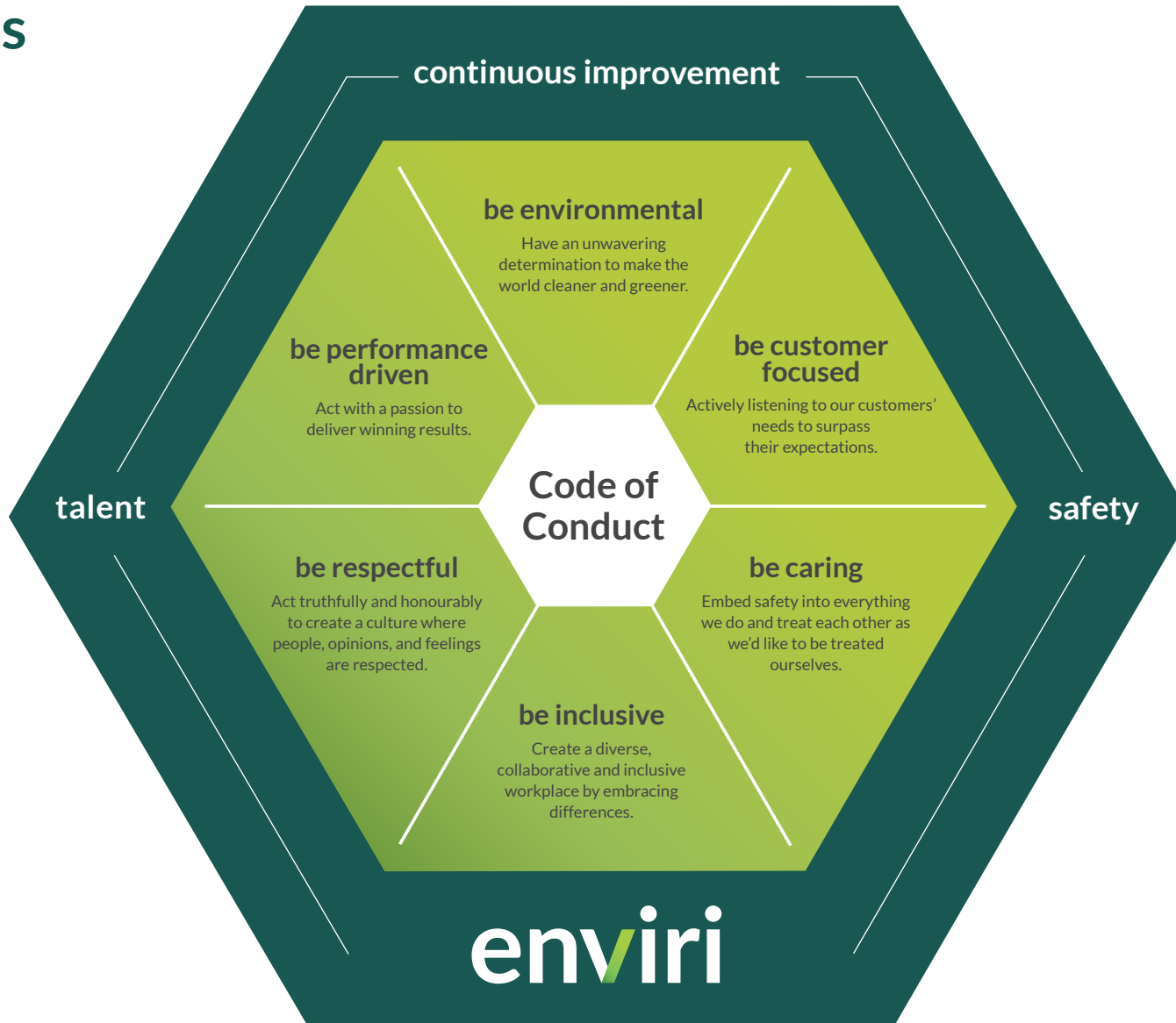
contents

Welcome From Our Leadership	05	Customers, Suppliers, and Other Third Parties	27
Our Values Matter	06	• Sales and Marketing Activities	28
Commitment to Integrity	07	• Responsible Contracting	29
• Purpose	08	• Supplier Relationships	30
• Raising Good Faith Concerns	09	• Engaging and Monitoring Third Parties	31
• The Integrity Line	11	Ethical Business Practices	32
• Violations of Our Code of Conduct	12	• Anti-Corruption	33
• Investigations	12	• Conflicts of Interest	34
• No Retaliation	13	• Gifts and Entertainment	35
• Responsibility of Management	14	• Anti-Money Laundering	36
• “Compliance” in Our Business	15	• Anti-Fraud	37
Safe and Respectful Workplace	16	• International Trade and Sanctions	38
• Health and Safety	17	• Insider Trading	39
• Diversity and Inclusion	18	• Antitrust	40
• No Discrimination	18	• Fair Dealing	41
• No Harassment	19	Commitment to the Greater Good	42
Company Information and Property	20	• Environmental Stewardship	43
• Confidential Information	21	• Human Rights	44
• Intellectual Property	22	• Civic, Charitable and Political Activities	45
• Company Assets	23	Resources	46
• Books and Records	24	Glossary	47
• External Communications	25		
• Social Media	26		





our values matter





welcome from our leadership

our values matter

commitment to integrity



safe and respectful workplace

company information & property

customers, suppliers, & other third parties

ethical business practices

commitment to the greater good

commitment to integrity

why it matters.

As an Enviri employee, you are expected to do business the right way, consistent with Enviri Values. We are all responsible for promoting and maintaining an ethical business culture.

purpose

raising good faith concerns

the integrity line

violations of our code of conduct

no retaliation policy

responsibility of management

“compliance” in our business





purpose

Enviri conducts business ethically and with integrity.

Our Code of Conduct contains the basic principles that you must follow to conduct business the right way.

The Code applies to all Enviri employees worldwide.

We expect our contractors, consultants, representatives, suppliers, and all third party business partners to comply with applicable provisions of the Code when working with us.

If you engage any third party for Enviri, make sure that the contract or agreement includes our “Business Partner Code of Conduct.”

You are also responsible for following the laws that apply where you work - including U.S. laws that apply outside of the United States, such as the U.S. Foreign Corrupt Practices Act, also known as the “FCPA.”

If a policy, local law, or custom conflicts with our Code, follow the stricter requirement or contact [Global Compliance & Ethics](#) or the [Office of the General Counsel \(OGC\)](#) for advice.

The Code does not address every ethical dilemma you may face. If you encounter something that is not covered by our Code, there are several resources to assist you: your manager, Human Resources, Global Compliance & Ethics, or the Integrity Line.



quick takeaways

- Become familiar with the Code of Conduct.
- Avoid even the appearance of misconduct.
- Maintain professional conduct when traveling for work, and follow our Code and policies when representing our Company.





raising good-faith concerns

When faced with a difficult decision about business conduct or business ethics, contact your manager with your good faith concern.

are not satisfied with the response, contact Human Resources, Global Compliance & Ethics, or the Integrity Line.

Good faith means you are reporting a concern that you honestly believe may be true, and you are not making a malicious report.

Managers are required to immediately notify Global Compliance & Ethics if someone reports a concern or allegation of misconduct.

If you are uncomfortable approaching your manager, or you have spoken to your manager and

Speak up

Excuses like these can put Enviri at risk:

"It is not my problem."

"No one will notice"

"Just this once, it can't hurt anyone."

"It is not my job."

"I will wait until it happens again."

"It won't make any difference."

"The Company can afford it."





always do what is right





welcome from our leadership

our values matter

commitment to integrity



safe and respectful workplace

company information & property

customers, suppliers, & other third parties

ethical business practices

commitment to the greater good

the integrity line

You may confidentially report good-faith concerns or ask questions at any time to the Enviri [Integrity Line](#) via phone or webpage.

The Integrity Line is operated by a third party organization.

You may even remain anonymous, where permitted by law.

Your information is confidentially relayed to Enviri's Global Compliance & Ethics team for review and follow-up.

Due to local privacy laws in certain countries, the Integrity Line may accept only specific types of calls, such as accounting, financial, auditing, and bribery matters. In those countries, contact your immediate manager, Human Resources, or Global Compliance & Ethics to report other issues.

report by:



in the U.S.: **866-203-4957**
outside the U.S.: [click here](#) for local access numbers and dialing instructions

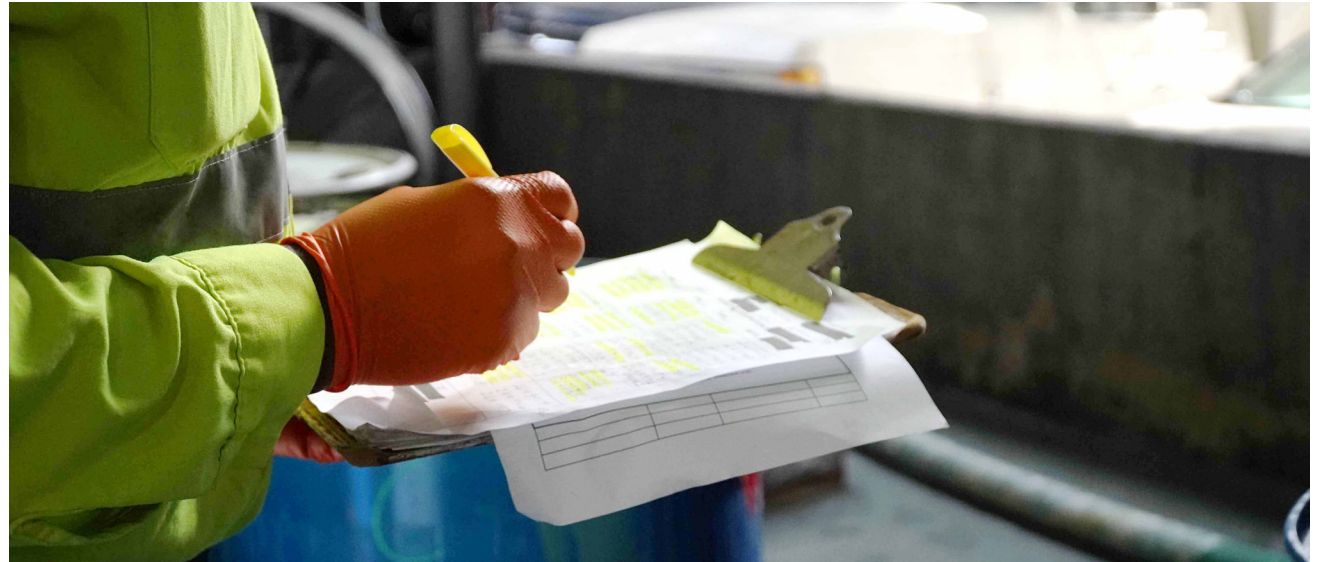


for online [click here](#)



violations of our Code of Conduct

Anyone who violates the Code of Conduct, our policies, or the law will be subject to discipline that may lead to separation of employment and/or legal action.



quick takeaways

- If you have a good-faith concern or question, contact your manager, Human Resources, **Global Compliance & Ethics**, or the Integrity Line immediately.
- Do not assume someone else has already reported the concern.
- Be honest when reporting the issue and provide all the information that you have.



investigations

We take all reports of alleged misconduct seriously.

The Global Compliance & Ethics team follows an established written process to review concerns and investigate good-faith reports of alleged misconduct.

Investigations are conducted confidentially to determine whether there is any evidence to support the allegation(s) and if so, whether any remedial action is warranted.

As an employee, you must cooperate with any investigation, and that includes promptly answering all questions thoroughly and honestly and providing all requested documents or data.



welcome from our leadership

our values matter

commitment to integrity



safe and respectful workplace

company information & property

customers, suppliers, & other third parties

ethical business practices

commitment to the greater good

no retaliation

We do not tolerate retaliation against anyone who raises a concern.

Managers must be vigilant to ensure that no retaliation occurs when an employee raises a concern.

Never fear retaliation or let it discourage you from asking questions or sharing concerns. If you experience or witness retaliation, report it immediately to Human Resources or [Global Compliance & Ethics](#).



learn more

[Anti-Retaliation Policy](#)



responsibility of management

Managers are expected to lead by example.

If you are a manager, ensure that your team understands the Code of Conduct and is familiar with the policies, procedures, and internal controls that apply to their roles.

Our leaders are expected to create a culture of ethics and compliance that encourages employees to feel comfortable raising good-faith concerns without fear of retaliation.

Ensure that employees understand that business results are never more important than ethical conduct, safety, and our Values.



If you are in a position of leadership, you are expected to:

- Inspire excellence in your team members.
- Be open to suggestions and ideas.
- Encourage your employees to read and follow the Code of Conduct and to contact you with any questions or concerns.
- Follow the internal controls that apply to your area.
- Promptly escalate violations of our Code of Conduct, policies, or the law to Global Compliance & Ethics or the Integrity Line.
- Prevent retaliation against those who speak up.
- Ensure timely completion of all Compliance trainings.



“compliance” in our business

We all have a responsibility to promote a strong compliance culture, with an unwavering commitment to business ethics, our Code of Conduct and Values, and environmental stewardship.

In our business, the term “compliance” is used in many contexts. Most often, compliance refers to our “corporate compliance” program or to our “regulatory compliance” obligations.

- Our corporate compliance program is managed by our Global Compliance & Ethics team, whose mission is to ensure compliance with our Code of Conduct and that we follow the expectations of the U.S. Department of Justice for an effective corporate compliance program.
- Our regulatory compliance program is managed throughout the Enviri business and focuses on our obligations to comply with specific laws and regulations – often environmental - that govern our business.

While corporate compliance and regulatory compliance are distinct terms, they both entail the importance of ethical business practices and living our Values.





welcome from our leadership

our values matter

commitment to integrity

safe and respectful workplace >

company information & property

customers, suppliers, & other third parties

ethical business practices

commitment to the greater good

safe and respectful workplace

We promote a safe and respectful workplace. As a global company, we work side by side with people from many nations and cultures.

We respect the varied viewpoints of everyone. We recognize that despite our differences, we are guided by a common set of Enviri Values and are united by our integrity.

health and safety

diversity and inclusion

no discrimination

no harrassment





health and safety

Our “be caring” Value reflects the importance of eliminating workplace injuries and illnesses and is designed to protect our employees, customers, work environment, and communities.

All Enviri employees and contractors are responsible for safety in the workplace.

We all must lead by example to identify and take appropriate steps to address unsafe conditions, and to actively promote behaviors that create a positive, safe, and healthy work environment.

All Enviri workplaces have a strict policy against the use of alcohol, illegal drugs, or improper or unsafe use of any drug or medication that could impair your ability to do your job.

If you are prescribed medication that affects your ability to perform your duties, you must alert your manager immediately, where permissible by law.

We reserve the right to test employees for drug and alcohol use when permitted by applicable law.



quick takeaways

- Make safety your top priority – never compromise safety to meet a business goal.
- Report any potential hazard, accident, or injury immediately.
- Cooperate with all risk assessments, audits, and accident and injury investigations.
- Do not attempt a task for which you are not adequately trained.
- Always do things the safest way – even if there is an easier or faster way.
- Watch out for the safety and welfare of coworkers and urge them to immediately address unnecessary risks.
- If you notice someone working in an unsafe environment, stop work and report your concern immediately.



learn more

[Health & Safety Policy](#)
[Drug and Alcohol policies](#)



welcome from our leadership

our values matter

commitment to integrity

safe and respectful workplace
< >

company information & property

customers, suppliers, & other third parties

ethical business practices

commitment to the greater good

diversity and inclusion

Our diverse work force is a source of pride.

We value our differences in all forms - gender, sexual orientation, age, race, disability, citizenship status, national origin, and religion, or any other characteristic protected by applicable law, and welcome the unique contributions, perspectives, and ideas of every employee.

Wherever we do business, we work together to foster a culture where all employees are treated with respect, feel valued, and have a strong sense of belonging.

no discrimination

We are an equal opportunity employer and do not discriminate on the basis of race, color, gender, religion, sex, national origin, age, disability, pregnancy, protected veteran status, marital status, or any other characteristic protected by applicable law.

All employment-related matters (e.g., recruiting, hiring, training, salary, and promotion) are based on an individual's performance and job qualifications.

Enviri operates in many countries, each with its own laws, requirements, and restrictions.

The best way to comply with the law – regardless of your location – is to keep all your interactions professional and respectful. When in doubt, contact [Global Compliance & Ethics](#) for assistance.



learn more

[Equal Employment Opportunity and Affirmative Action Policy](#)



welcome from our leadership

our values matter

commitment to integrity

safe and respectful workplace
< >

company information & property

customers, suppliers, & other third parties

ethical business practices

commitment to the greater good

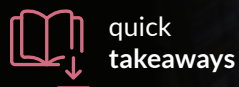
no harassment

All employees should be able to work in an environment free of harassment, bullying, and abusive conduct.

Our policies prohibit any unwelcome conduct – whether physical, verbal, or visual – that creates an offensive, hostile, or intimidating environment.

We do not tolerate harassment, whether sexual or non-sexual in nature and whether committed by an Enviri employee or someone else with whom we do business.

If you see or experience harassment, immediately report it to your manager, Human Resources, Global Compliance & Ethics, or the Integrity Line.



Harassment can take many forms:

- In person, emails, texts, or online, such as via social media.
- Spreading malicious rumors about someone.
- Telling jokes that are offensive or obscene.
- Belittling or ridiculing someone for their beliefs, opinions, background, or appearance.
- Unwelcome touching or asking for sexual favors.
- Threatening violence, harm, or revenge.



learn more

[Policy Against Discriminatory Harassment](#)



welcome from our leadership

our values matter

commitment to integrity

safe and respectful workplace

company information & property
>

customers, suppliers, & other third parties

ethical business practices

commitment to the greater good

Company information & property

We must keep our assets safe from theft, damage, waste, abuse, and misuse.

confidential information

intellectual property

company assets

books and records

external communications

social media





confidential information

Confidential information may include data about our Company and information that our customers and suppliers share with us.

We handle confidential information responsibly by gathering, using, and disclosing it in compliance with applicable laws and policies.

We have an obligation to responsibly and lawfully collect, store, process, and transfer personal data.

We do not release personal information except as permitted by applicable law.

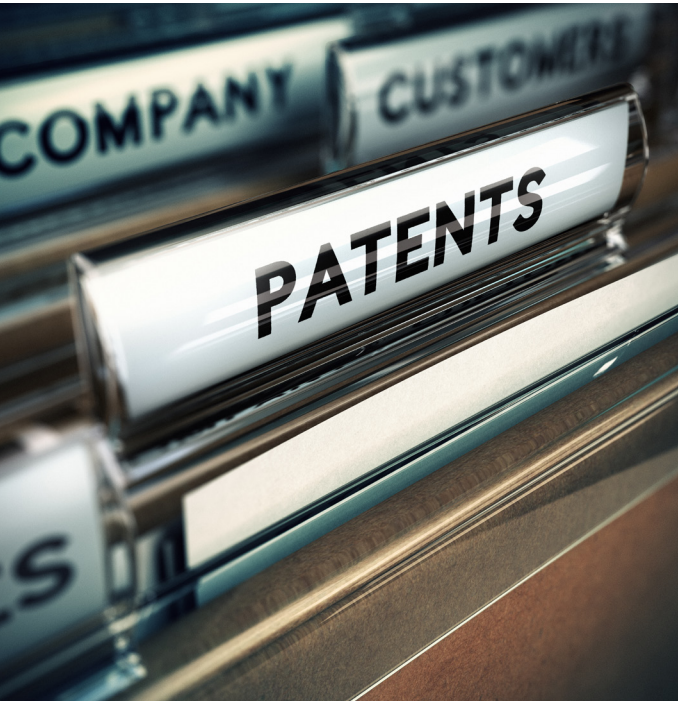
Limit the amount of information you share to what is required to accomplish the task.

Your confidentiality obligations do not limit your ability to report misconduct to any governmental agency.



quick takeaways

- Collect and store confidential information in a secure manner.
- Disclose confidential information only to those who are authorized to receive it and keep it password protected.
- Never discuss confidential information in public places where your conversation may be overheard or paperwork can be seen.
- Never share confidential information on social media or send it on non-secure networks.
- Never record a conversation without the express consent of all parties.
- Protect confidential information from theft and improper use by providing the appropriate safeguards, including locked or protected storage.
- If you leave Enviri, do not share or use Enviri's confidential information.



intellectual property

Intellectual property (IP) includes patents, trademarks, copyrights, designs, inventions, process flows, know-how, and trade secrets.

IP represents the specialized knowledge and teamwork of many people and many years of work.

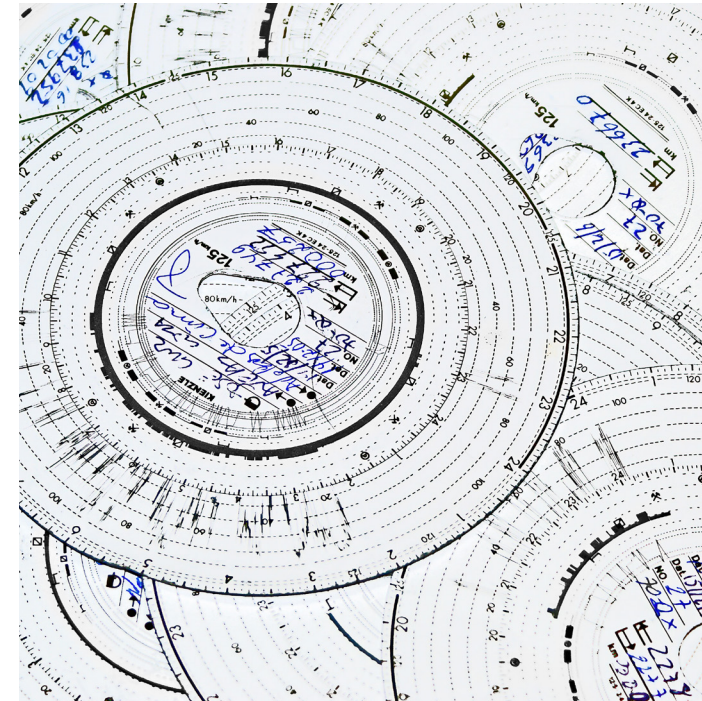
IP that you create during your employment belongs to the Company.



- Protect our IP.
- Respect the IP of other companies. Do not share it with anyone without permission.
- Share IP only with those who need it for a business reason.
- If you leave Enviri, you may NOT (i) take any confidential IP with you or (ii) share our confidential IP with anyone.



learn more [Unsolicited Ideas policy](#)





Company assets

Company assets include the places where we work, and the property, equipment, and supplies we use.

Report any suspected theft, damage, misuse, or abuse of Company assets.

Company assets include electronic devices such as computers, laptops, cell phones, and mobile devices provided by Enviri.

Maintain the safe use and security of these devices, as well as the systems, networks, and software that we use to store, retrieve, and transmit information and communications.

Safeguard our technology from theft and unauthorized use.

If you take electronic devices with you to a job site or other remote location, keep them in your possession at all times.



quick takeaways

- Care for Company assets as if they were your own.
- Use Company assets for business-related purposes only.
- Never lend, sell, or give away assets unless authorized to do so.
- Return Company assets, including electronic devices, at the end of your employment.
- Follow any non-compete agreements that may be in place.
- Never let anyone borrow, use, or access any assets, including the Company's electronic devices, without permission.
- Never install or download unauthorized software applications onto any Company device.
- Never access our Company's network through an unauthorized network or device.
- Never share or leave your passwords in public view.
- Anything you create, store, send, share or download on our systems, assets, and/or electronic devices belongs to the Company and we may monitor or search those systems, assets, and/or electronic devices without notifying you, to the extent permitted by law.
- Never use Enviri's electronic devices to send, receive, view, or download unlawful, offensive, discriminatory, or threatening content; to harass anyone; or to reveal confidential information.



learn more

[Acceptable Use Policy of Information Technology](#)





books and records

Accurate recordkeeping is essential to comply with the law and operate our business effectively.

Our records must be timely, accurate, and complete; and we never falsify, omit, or mislead when recording data.

If you are involved in preparing disclosure documents for regulatory filings, be vigilant to ensure you do not misrepresent or omit material facts.

Always comply with legal requirements, internal and financial controls, and policies and procedures.

Manage, store, retain, and dispose of records in compliance with our records retention policies and the law.



learn more

[Internal Control Framework policy](#)
[Records Retention policy](#)



quick takeaways

- Follow our internal controls and provide all supporting documentation.
- Record transactions in the proper account, department, and accounting period.
- Accurately document all supplier and third party contracts.
- Cooperate with internal and external audits, or inquiries, including requests for a "Legal Hold."
- Never dispose of information that may be relevant to an audit, an investigation, or litigation.
- Immediately report any inaccuracy or suspected act of financial misconduct.
- Comply with all applicable tax laws and regulations, and do not facilitate any form of tax evasion.



external communications

To ensure that accurate, timely, and complete information about our business is communicated to the public, regulatory authorities and others, we have designated individuals to serve as our official Company spokespersons.

If you receive an information request from the media, you should not respond unless you are authorized to speak on behalf of Enviri.

Refer all media inquiries to the Corporate Communications department.

Refer all questions from analysts, financial advisors, and other members of the investment community to the Investor Relations department.

If you are contacted by a government official or law enforcement agency, promptly contact your local divisional counsel before providing any information.

If you are questioned as part of an investigation or audit, cooperate fully and provide truthful, accurate, and complete information.





social media

Social media includes any digital communication channels that allow individuals to create and share content and post comments. Employees should review our policies that govern the use of social media.

Our policies apply to business communications related to job responsibilities and to personal communications that may impact the reputation of our Company.

Be respectful and use mature judgment even when using social media for personal activities. Remember, your conduct may impact the way others view Enviri and what we stand for.



learn more

[Social Media policy](#)



quick takeaways

- Do not post anything on social media on behalf of Enviri unless you are authorized to do so.
- Do not post any photos or videos of your place of employment unless you are authorized to do so.
- Exercise good judgment and discretion on your personal and professional social networking platforms.
- Never disparage our customers, vendors, or competitors on social media.
- Contact our Corporate Communications department if you discover a social media post that misrepresents our business, services, or products, or is potentially damaging to Enviri’s business, reputation, or public image.



welcome from our leadership

our values matter

commitment to integrity

safe and respectful workplace

company information & property

customers, suppliers, & other third parties
>

ethical business practices

commitment to the greater good

customers, suppliers, and other third parties

For over 170 years, Enviri has earned the trust of customers and the public.

Every Enviri employee is responsible for maintaining that trust.

Be ethical, fair, and honorable at all times and do not engage in any actions that would portray Enviri in a poor light.

sales and marketing activities

responsible contracting

supplier relationships

engaging and monitoring third parties





sales and marketing activities

We are honest about our products, services, and capabilities and never make promises that we cannot keep.

In our marketing, advertising, and promotions, we do not misrepresent or conceal information.

We provide customers with the information they need to make an informed decision, and are always truthful and accurate in our communications.



quick takeaways

- Provide fair and balanced information.
- Never market our products or services in a misleading way.
- Make sure our claims are factually supported.
- Make sure that any written or visual representations accurately reflect the products or services we offer.





responsible contracting

As a Company that obtains much of its business through formal bid and contract processes, we believe that honesty, transparency, and accountability are important to winning and retaining contracts.

If your work involves bid and contract preparation or management, you must comply with all applicable procurement policies and laws, including the use of proper documentation and obtaining necessary approvals.

Do not participate in any activity that could be perceived as a kickback, bribe, or effort to improperly influence a contract outcome. You must report any such activities to your manager, Human Resources, [Global Compliance & Ethics](#), or the [Integrity Line](#).

Understand that the requirements in government-related contracts can sometimes be much stricter than those governing general commercial contracts, so be careful to comply with all relevant statutory, regulatory, and contractual provisions.

Avoid even the appearance of anything improper.



quick takeaways

- Be accurate, truthful, and complete in preparing bids and proposals for contracts.
- Comply with all specifications, terms, and conditions of our contracts.
- Create clear and accurate invoices reflecting actual charges for work.
- Cooperate with authorized inspections, investigations, and audits.
- Protect confidential information and property.
- Be mindful of any specific requirements applicable to government-related contracts.



supplier relationships

We work to ensure our dealings with suppliers are fair, open, and transparent.

We select suppliers based on their ability to provide the best value to Enviri, evaluating them on cost, quality, service, and reputation.

We conduct business only with suppliers that comply with local and other applicable legal requirements and Enviri guidelines relating to human rights, labor, the environment, and health and safety.

We expect our suppliers to abide by the ethical and legal standards applicable to Enviri employees, such as conflicts of interest, confidentiality, and anti-bribery.

Suppliers must acknowledge our “Business Partner Code of Conduct.”





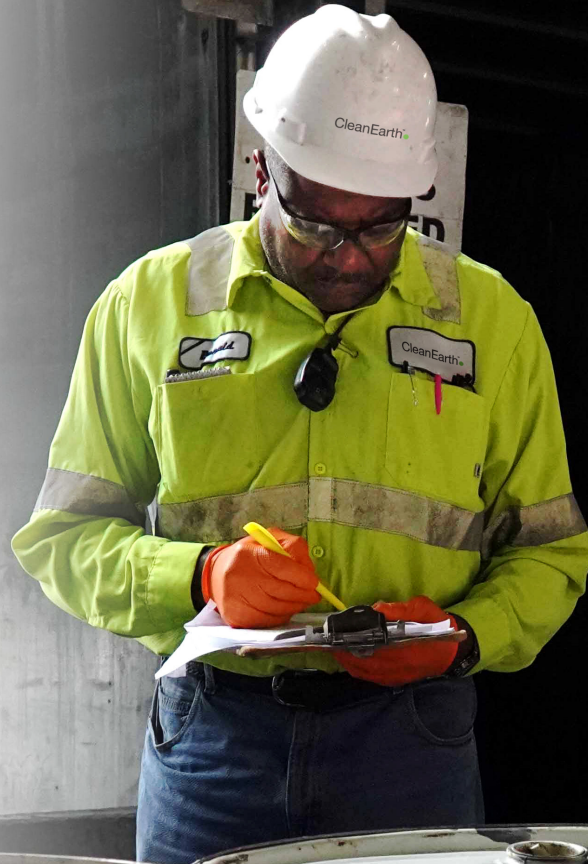
engaging and monitoring third parties

We are careful in choosing third parties who work with us or on our behalf.

Make sure prospective third party business partners are reputable and qualified.

Any supplier or third party who works for Enviri must undergo our due diligence process before engagement.

You should also provide third parties with a copy of our Business Partner Code of Conduct, hold them accountable while conducting business with us, and maintain continuous oversight of their work for Enviri.



learn more

Anti-Corruption Policy
Due Diligence Policy
Consultants, Business Advisors,
and International
Representatives Policy



welcome from our leadership

our values matter

commitment to integrity

safe and respectful workplace

company information & property

customers, suppliers, & other third parties

ethical business practices
>

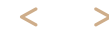
commitment to the greater good

ethical business practices

We live our Values by conducting business ethically and ensuring compliance with the laws and regulations that govern our business and industry.

- anti-corruption
- conflicts of interest
- gifts and entertainment
- anti-money laundering
- anti-fraud
- international trade and sanctions
- insider trading
- antitrust
- fair dealing





anti-corruption

Enviri has zero-tolerance for any form of bribery or corruption, regardless of local business practices.

We follow the laws and regulatory requirements in the countries where we do business.

Many anti-corruption laws apply globally, including the U.S. Foreign Corrupt Practices Act (FCPA).

Never engage in bribery: that is, do not offer or accept anything of value to improperly influence a business decision or to gain an improper advantage.

Bribery can occur both in government and commercial interactions.

A bribe can be something other than cash: a gift, a favor, a job, or even a charitable contribution – if offered to improperly influence a decision.

Regardless of local practice or the practices of other companies, make sure you avoid even the appearance of a bribe, kickback, or improper payment.

We are also responsible for the acts of those who conduct business for us, and we may be liable for any bribes they offer on our behalf.

Inform third parties that Enviri has zero-tolerance policy towards bribery and corruption.

Comply with local laws and obtain approval from Global Compliance & Ethics via “Form A” before offering anything of value to a government official. This includes modest gifts related to local cultural practices, business meals, or any form of travel or entertainment.



quick takeaways

- Never offer or accept a bribe.
- Never allow anyone to offer or accept a bribe on behalf of Enviri.
- Be accurate and complete when recording all transactions in our books and records.
- Report any actual or suspected acts of bribery.



you should know

- Enviri prohibits “facilitation payments.” Facilitation payments are small payments demanded by foreign government officials or agencies to perform routine functions such as inspecting goods or securing shipping permits.
- If you are asked to make a facilitation payment, discuss the matter with Global Compliance & Ethics.



learn more

[Anti-Corruption Policy](#)



conflicts of interest

Each of us has a responsibility to make decisions in the best interests of Enviri.

A conflict of interest is when your personal interests interfere – or potentially interfere – with the interests of the Company.

It is not always clear whether an activity creates a conflict of interest, and even the appearance of the conflict of interest can undermine trust in you and our Company.

You must disclose in writing to your supervisor any potential or actual conflicts of interest at the time you are hired or when a potential conflict arises.

Any third party doing business on behalf of Enviri is required to disclose in writing to its Enviri contact any potential or actual conflict of interest upon engagement or when a conflict arises.

If you answer **YES**, disclose it in writing.

If you answer **NO**, it's probably okay to do.

If you can answer "YES" to any of these questions, then you may have a conflict of interest.

Does the activity compete with the work that Enviri does?

Am I, a member of my family, or a close friend gaining an improper benefit?

Am I taking an opportunity away from Enviri that I learned about at work?

before you act, ask yourself:

01

02

03

04

05

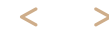
06

Does it potentially interfere with my ability to act in the best interest of Enviri?

Am I using Enviri assets, resources, or funds to support or promote the activity?

Is the activity taking time away from my work at Enviri?

do what is right



gifts and entertainment

It is common to exchange infrequent and modest business gifts or other courtesies to express goodwill. However, gifts should not be used as a bribe or to otherwise obtain favorable treatment.

If you provide “anything of value” to a government official, such as gifts, meals, travel, lodging, donations or entertainment, please consult our Anti-Corruption and Travel & Entertainment policies for required approval and documentation via the “Form A” process.

If you are not sure whether you can offer or accept a gift, contact your Manager, Human Resources, or Global Compliance & Ethics.



quick takeaways

In general, you may NOT:

- Offer or accept cash or its equivalent in any form, no matter how small the amount.
- Offer or accept anything of value if it could be perceived as a bribe.
- Offer anything of value to a government official without obtaining the necessary approvals via the Form A process prescribed in our Anti-Corruption Policy.

In general, you may:

- Pay for modest and infrequent business meals, where lawful.
- Provide reasonable and tasteful entertainment and hospitality.
- Accept modest and infrequent meals and refreshments from others in connection with business discussions.
- Accept offers of reasonable entertainment and modest hospitality.
- Accept infrequent business gifts that are neither lavish nor extravagant.



learn more

Gifts, Travel & Entertainment



anti-money laundering

Money laundering occurs when the proceeds of illegal activities are passed through legitimate businesses to conceal their origin.

Enviri never knowingly conducts business with individuals involved in money laundering.

Be aware of transactions that involve:

- Large cash payments
- Fund transfers to countries where the customer or supplier does not do business with Enviri
- Requests to make a payment from or to a source that is not associated with the customer's or supplier's business



welcome from our leadership

our values matter

commitment to integrity

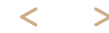
safe and respectful workplace

company information & property

customers, suppliers, & other third parties

ethical business practices

commitment to the greater good



anti-fraud

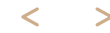
We protect Company assets and strive to prevent fraud.

Enviri does not tolerate cheating, stealing, or misrepresentations, and we never deceive others, directly or indirectly.

Minimize the risk of fraud by following all internal controls, providing sufficient oversight of transactions, and ensuring all transactions are properly approved and documented. Report any suspicious activity or transactions to your manager, Human Resources, or Global Compliance & Ethics.

Some activities that have a higher risk of fraud include:

- Processing of cash disbursements
- Receiving cash
- Payroll processing
- Inventory control
- Procurement



international trade and sanctions

As a U.S.-based company conducting business all over the world, we must comply with laws and regulations that relate to imports, exports, customs, and other trade compliance issues.

If you are involved in the movement of products, services, information, or technology across international borders, comply with U.S. laws and those trade laws associated with the countries where you do business.

Enviri does not conduct business with sanctioned countries or restricted parties.

You should contact the Office of the General Counsel or Global Compliance & Ethics if you have any questions related to international trade and sanctions.

We also do not participate in any boycott that is not approved by the U.S. Government.

If you receive a request to comply with a boycott (or a request to supply boycott-related information), seek guidance from the Office of the General Counsel.



quick takeaways

- Make sure that anything intended for import or export is properly classified in advance.
- The laws of more than one country may apply in cross-border transactions.
- Communicate our trade compliance policies to third parties who do business on our behalf.
- When in doubt about requirements, contact the Office of the General Counsel.



insider trading

During our work, we may have access to material, non-public (“inside”) information about Enviri – information that a reasonable investor would consider important when making a decision to buy, sell, or hold our stock.

We may also learn inside information about our suppliers, our business partners, and our customers.

We must protect this information.

Never trade on inside information or tip off others about inside information.

Certain employees are subject to tighter restrictions and should only trade Enviri stock by obtaining pre-approval during approved periods.

If you have any questions about whether you can trade our stock, contact the Office of the General Counsel.



learn more

[Insider Trading Policy](#)



quick
takeaways

Examples of inside information:

- Estimates of future earnings or profits.
- Awards or cancellations of major contracts.
- Planned mergers or acquisitions.
- Changes in executive management.
- Lawsuits, investigations, or legal activities.



welcome from our leadership

our values matter

commitment to integrity

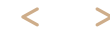
safe and respectful workplace

company information & property

customers, suppliers, & other third parties

ethical business practices

commitment to the greater good



antitrust

We compete fairly and comply with laws that promote competition and free trade.

Never engage in any activities that may limit competition, and do not enter into any agreement – whether formal or informal – with a competitor, customer, or supplier that would restrict trade or exclude others from competing.

If a competitor starts discussing such matters, stop the conversation immediately and report the incident to the Office of the General Counsel.



quick takeaways

Off-limit topics with a competitor:

- Pricing, costs, or terms or conditions of sale.
- Manipulating bids in a competitive bidding process.
- Dividing markets, territories, products, or customers.
- Restricting production, sales or output.
- Preventing others from entering the market.
- Refusing to work with a client or supplier.



fair dealing

We treat our customers, suppliers, and other third parties fairly.

We must gather information legally and ethically.

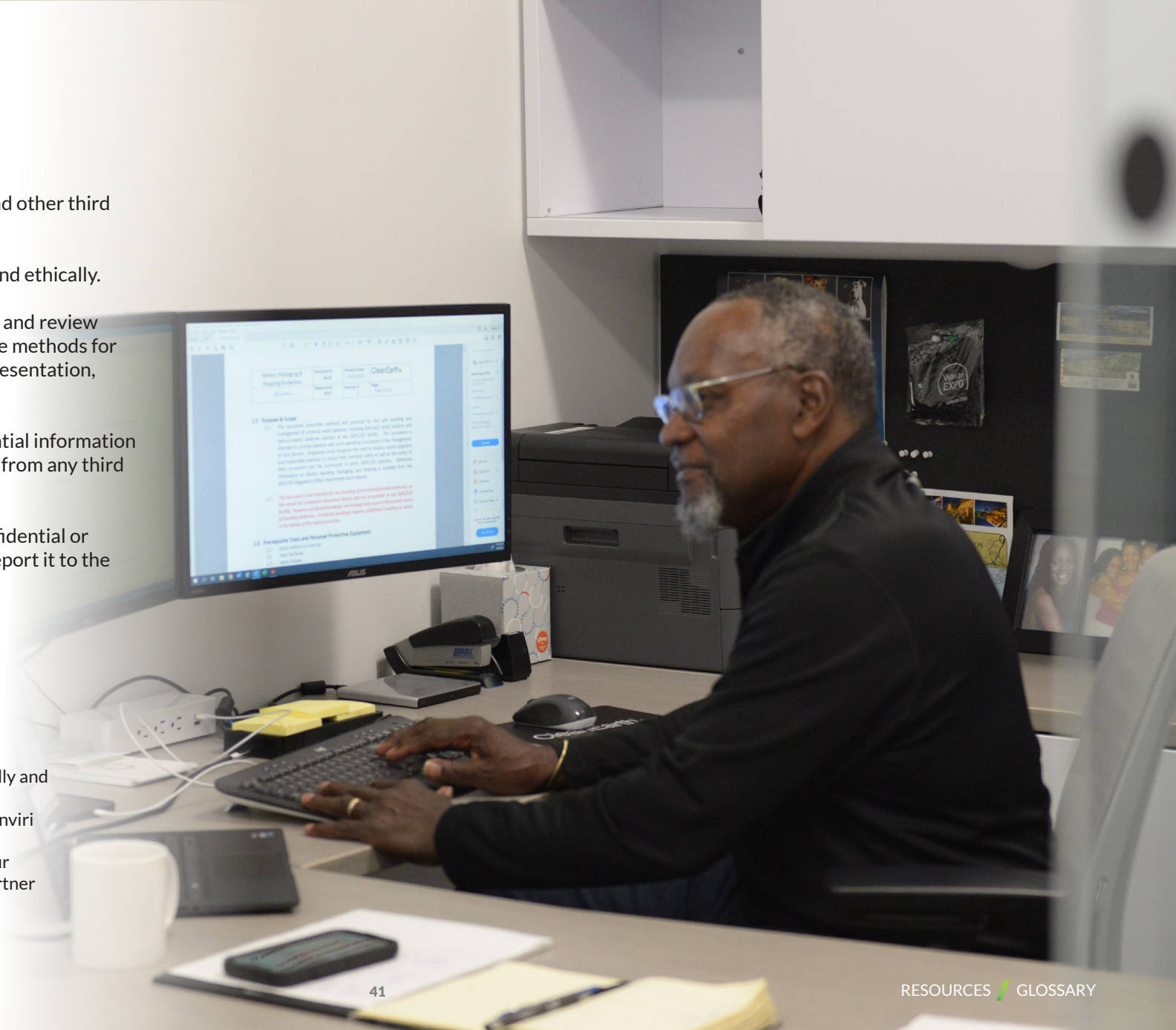
Market research, product evaluation, and review of public documents are all acceptable methods for obtaining information; fraud, misrepresentation, and deception are not.

Never ask for a competitor's confidential information from current or former employees or from any third parties, customers, or suppliers.

If you receive information that is confidential or obtained through improper means, report it to the Office of the General Counsel.

quick takeaways

- Gather competitive information legally and ethically.
- Sensitive information pertaining to Enviri must be kept confidential.
- Ensure that third parties acting on our behalf acknowledge our Business Partner Code of Conduct.





welcome from our leadership

our values matter

commitment to integrity

safe and respectful workplace

company information & property

customers, suppliers, & other third parties

ethical business practices

commitment to the greater good



commitment to the greater good

We dedicate our time, talent, and energy to be a globally responsible and ethical company.

We also support principles of “ESG” to meet Environmental, Social, and Governance goals.

environmental stewardship

human rights

civic, charitable, and political activities





welcome from our leadership

our values matter

commitment to integrity

safe and respectful workplace

company information & property

customers, suppliers, & other third parties

ethical business practices

commitment to the greater good



environmental stewardship

We are committed to delivering environmentally sustainable solutions, and to ensuring compliance with all environmental laws and regulations.

Your business decisions should always incorporate sound and compliant environmental practices.



quick takeaways

- Comply with all environmental laws, including local, state, and federal regulations.
- Aim for continuous improvement in environmental performance and sustainability.
- Cooperate with Enviri's environmental audits to ensure we meet acceptable standards.
- Choose technologies, processes, and treatment alternatives that reduce the environmental impact of Enviri's operations.
- Provide innovative solutions to help customers solve their most pressing sustainability challenges.
- Improve our environmental compliance record and our environmental footprint through operational efficiency and continuous improvement.



learn more

[Environmental Policy](#)

enviri
UNITED BY INTEGRITY





welcome from our leadership

our values matter

commitment to integrity

safe and respectful workplace

company information & property

customers, suppliers, & other third parties

ethical business practices

commitment to the greater good



human rights

We believe every human being has the right to safe, healthy working conditions, and to be treated with dignity and respect.

We expect suppliers throughout our global supply chain to share our commitment to the same high standards by acknowledging our Business Partner Code of Conduct.

We are also committed to the responsible sourcing of conflict minerals.

We comply with laws that require disclosure of their use, and we encourage our suppliers to adopt similar policies and systems.

We prohibit:

- Child labor
- Forced labor
- Physical punishment or abuse
- Slavery
- Human trafficking



learn more

[Human Rights Policy](#)
[Conflict Minerals Policy](#)





welcome from our leadership

our values matter

commitment to integrity

safe and respectful workplace

company information & property

customers, suppliers, & other third parties

ethical business practices

commitment to the greater good



civil, charitable, and political activities

Never use Enviri funds, assets, resources, time, or the Enviri brand to support your personal activities or views, regardless of their nature.

Be clear that your personal views and actions do not represent those of Enviri.

Use social media responsibly and ensure that your personal, political, or social views are not associated with Enviri.

- Enviri may occasionally communicate about political issues that could affect our business.
- Lobbying activities on behalf of Enviri must have prior approval from the Global Government Relations group in the Office of the General Counsel.
- Enviri never tells employees how to vote.





Resource	Subject	Contact
Enviri Integrity Line	Questions or concerns about suspected violations of the Code of Conduct, law, or our policies.	Country specific phone numbers: http://compliance.enviri.com/ Email: compliance@enviri.com Web: http://compliance.enviri.com/
Global Compliance & Ethics	Questions about the Code of Conduct, our policies, Values or business ethics	Any member of Global Compliance & Ethics (GC&E) Email: compliance@enviri.com Web: Global Compliance and Ethics Portal
Compliance Ambassadors	Questions about the compliance program	Web: Compliance Ambassador Portal
Office of the General Counsel	Questions or concerns about suspected violations of the Code of Conduct, law, or our policies, and inquiries from any government official or agency.	Your local divisional counsel Email: legaldepartment@enviri.com
Corporate Communications	Media inquiries	Corporate Communications Email: corporatecommunications@enviri.com
Environmental Health and Safety (EH&S)	Questions or concerns about environmental, health, or safety issues	Site EHS representative or Division EHS leader Web: EHS Portal
Investor Relations	Questions from the investor community	Investor Relations Email: ir@enviri.com Web: Investor Relations
Internal Audit	Questions about internal controls	Any member of the Internal Audit department
Human Resources	Questions about employment, benefits, pay, workplace behaviors, performance, HR policies, and our Values	Your local Human Resources representative Web: Employee Portal



This Glossary defines some of the basic concepts and terms used in our Code.

Abuse. Abuse refers to the harmful or wrongful treatment of a person or group by another person or group, and it can take various forms such as physical, emotional, verbal, or sexual abuse.

Bribery. Offering, promising, giving, or receiving anything of value to gain an improper advantage, action, or decision.

Child labor. Work done by children that interferes with or exploits their health, education, or general well-being, or that is criminal or dangerous.

Company assets. Any resources that a company owns, controls, or has access to and is used to conduct business. Examples of company assets include physical assets such as property, equipment, and inventory, as well as intangible assets such as patents, trademarks, and goodwill.

Conflict of interest. A situation where an individual's personal interests interfere with his/her responsibilities to the Company or the business interests of the Company.

Discrimination. Unfair or unequal treatment of a person or group based on characteristics protected by law.

Facilitation payment. A payment made to a government official or a representative of a government agency to advance a routine action or service that the person or business is legally entitled to receive.

Fraud. Falsifying the facts in order to obtain an unfair advantage.

Gift. Anything of value, such as cash, tickets, travel, entertainment, and lodging.

Good Faith. Good faith means that you believe your statements are true and you have provided all relevant information, with good intentions.

Government official. An employee or appointee of a government or government-controlled entity, organization, agency or committee. May also include employees or representatives of a political party, political candidates, and employees and members of international organizations that represent governments.

Harassment. Unwanted actions or comments directed towards an individual or group that can be physical, verbal, or nonverbal in nature.

Human trafficking. Recruiting, harboring, transferring, or receiving individuals by force, fraud, or abduction for an improper purpose such as forced labor or sexual exploitation.

Insider trading. Buying, selling, or holding securities – or tipping others to do so – based on material non-public information.

Integrity Line. A reporting service administered by a third party, where employees and others can raise questions or concerns about conduct that may be inconsistent with the law, our Values, the Code of Conduct, or our policies.

Intellectual property. Knowledge, ideas, discoveries, formulas, inventions, and other intangible assets that have commercial value and are protected under copyright, patent, service mark and trademark laws.

International trade. The exchange of capital, goods, and services between two or more countries or territories.

Material non-public information. Non-public information that would likely affect an investor's decision to buy, hold, or sell the securities of a company.

Money laundering. The process of disguising the source or proceeds of illegal activity as legitimate.



Social media. Online platforms and applications that enable people to create, share, or exchange information and content with others in a virtual environment.

Supplier. Any vendor of products or services to the Company, including consultants, contractors, and agents.

Third party. A buyer, seller, agent or other individual or company that is involved in a transaction, contract, or business deal with Enviri, and is not an employee, director, or officer of our Company.

enviri