CODE OF CONDUCT POLICY FOR **BUSINESS PARTNERS**

Enviri Commitment

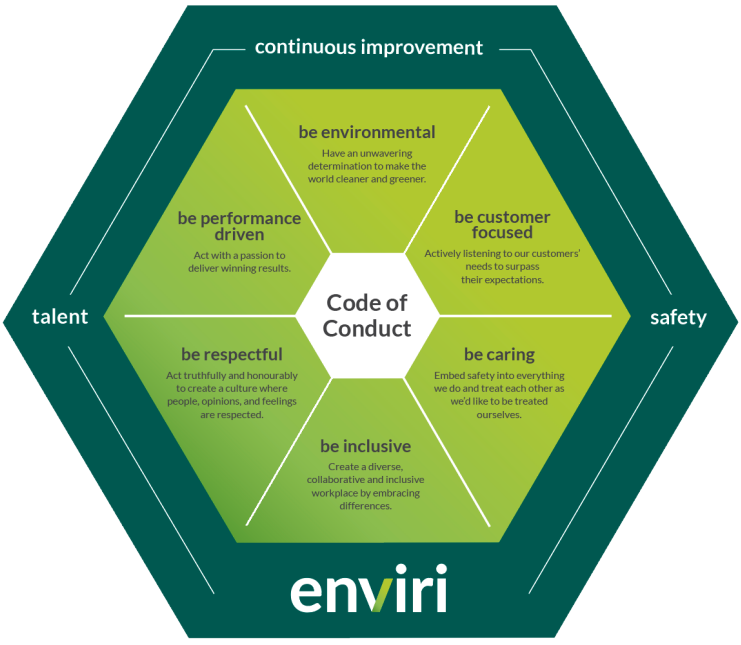
Enviri Corporation and its affiliated entities ("Enviri") is dedicated to administering and promoting its Business System and Values with agents, contractors, consultants, distributors, suppliers and vendors (collectively "Business Partners"). Enviri expects and encourages all Business Partners to apply the principles in our Code of Conduct ("Policy" or "Enviri Business Partner Code of Conduct") and act in ways that are consistent with the Policy. Enviri may elect not to work with, or cease working with, Business Partners who do not meet these expectations.

Please contact Enviri Global Compliance & Ethics at **compliance@enviri.com** with questions about this Policy.

Scope of this Policy

Our Policy is based on the Enviri Code of Conduct and defines rules of behavior and ethical standards that apply to all of Enviri's Business Partners. This Policy is not intended to be an exhaustive list of all ethical and business conduct requirements to be followed by Business Partners. Enviri expects its Business Partners to appropriately train their employees on the principles in this Policy to increase awareness and ensure good business practices.

Enviri reserves the right to conduct compliance audits of its Business Partners and their sub-contractors to verify the Business Partners' commitment to this Policy.



Code of Conduct Policy for Business Partners

Bribery, Kickbacks, and Frauds

No funds or assets can be paid, loaned or otherwise given as bribes, kickbacks, or other payments designed to influence or compromise the conduct of an Enviri employee or a government official. A bribe can be anything of value given to another person to gain an undue business advantage. Any item or service that is given with the aim of influencing a business decision may qualify as a bribe. Business Partners must refrain from any action that would provide something of value to an Enviri employee, counterparty or government official with the aim of gaining business, as any such action violates anti-bribery laws and this Policy.

For any questions about interactions with government officials, contact Global Compliance & Ethics at **compliance@enviri.com** before taking any action.

Responsible Contracting

Enviri is committed to ensuring that it maintains and upholds the Enviri Values when entering into a contract. Enviri expects its Business Partners and their sub-contractors to apply similar principles when entering into contracts with Enviri.

All Business Partners must respect their contractual commitments to Enviri. Business Partners must not collude with other tenderers, distributors, suppliers or contractors, or engage in any other form of anti-competitive behavior.

Due Diligence

All Business Partners must participate in our risk-based Due Diligence screening process. This includes the completion of all required forms and submission of any requested documentation (e.g., financial records).

Compliance with Laws

Business Partners must fully comply with all laws and regulations applicable to their business and their relationship with Enviri. Without limitation, these include all applicable laws and regulations governing

a. anti-bribery and corruption (including, but not limited to the Foreign Corrupt Practices Act, UK Bribery Act and Brazil Clean Companies Act);
b. the export, re-export and retransfer of goods, technical data, software and services;
c. import of goods;
d. labor and employment;
e. conflict minerals;
f. the environment;
g. economic sanctions and embargoes;
h. data protection,
i. anti-slavery and human trafficking;
j. U.S. antiboycott laws; and
k. competition requirements.

Conflicts of Interest

A conflict of interest may arise when a Business Partner has a competing professional or personal interest in the course of carrying out Enviri business. All Business Partners must avoid any Conflict of Interest in their work with Enviri. Business Partners should likewise ensure that all sub-contractors avoid such situations.

Any Business Partner that suspects an actual, potential or perceived Conflict of Interest must disclose the situation immediately and in writing to Enviri's Global Compliance & Ethics (GCE) team at **compliance@enviri.com.**

Environment, Health and Safety (EHS)

Business Partners are expected to conduct all activities in compliance with all relevant environmental and employee health and safety laws and regulations.

Any potential violation of environmental, health or safety laws, regulations or company practices or requests to violate established EHS procedures should be reported to Enviri immediately.

Code of Conduct Policy for Business Partners

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Gifts, Travel & Entertainment

Gifts that could reasonably be considered attempts to improperly influence an Enviri employee are never allowed. Employees of Enviri are prohibited from accepting or giving anything more than modest gifts, meals and entertainment from/to Business Partners. A gift includes, but is not limited to, tangible items as well as intangible items such as tickets to events, favors, special discounts, offers of employment, loans, etc. Ordinary business meals and small tokens of appreciation such as gift baskets at holiday time generally are fine, but Business Partners must avoid offering Enviri employees travel, frequent meals or expensive gifts. Gifts of cash or cash equivalents, such as gift cards, are never allowed.

To the extent that Enviri is paying for the expenses of a Business Partner, all such expenses must be reasonable and consistent with the requirements of Enviri's own travel and entertainment policy.

Human Rights & Child Labor

We expect our Business Partners to share our commitment to human rights: to treat people with respect and dignity; to encourage diversity, diverse opinions, and inclusion; to promote equal opportunity for all; and to engage in ethical business practices.

We require our Business Partners to ensure that compulsory labor - including child labor, forced labor, slavery and human trafficking - is not used in the performance of work. The term "child" refers to any person under the minimum legal age for employment where the work is performed.

Intellectual Property

Business Partners are expected to protect and respect all intellectual property belonging to Enviri which shall include but not be limited to all of Enviri's patents, trademarks, copyrights, trade secrets, know-how and other confidential or proprietary information.

Business Partners have no right to use any intellectual property or other proprietary information belonging to Enviri without prior written authorization from Enviri.

Reporting Misconduct

Enviri expects Business Partners to report illegal or unethical behavior, or any violation of this Policy to the Enviri Integrity Line.

- Email: **compliance@enviri.com**
- Phone: 866.203.4957 (English; other language options available by phone)
- Web: **http://compliance.enviri.com/**

Business Partners are expected to assist Enviri in the investigation of any Code of Conduct allegations involving Enviri and the Business Partner.

Code of Conduct Policy for Business Partners

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Acknowledgement

On behalf of the Business Partner, I have read and understand the Enviri Business Partner Code of Conduct, and acknowledge that the Business Partner is required to comply with it.

On behalf of the Business Partner, I understand that any Enviri Global Compliance & Ethics should be contacted with any questions regarding the Enviri Business Partner Code of Conduct.

On behalf of the Business Partner, I understand alleged violations of the Enviri Business Partner Code of Conduct must be reported to the Enviri Integrity Line and that Enviri expects cooperation with any investigation that may result.

_____ _____

Signature (on behalf of Business Partner) Date

_____

Printed Name and Title of Business Partner Representative

_____ _____

Business Partner Name Enviri Division

This acknowledgment should be returned to **complianceduediligence@enviri.com** and to your Enviri division point of contact.