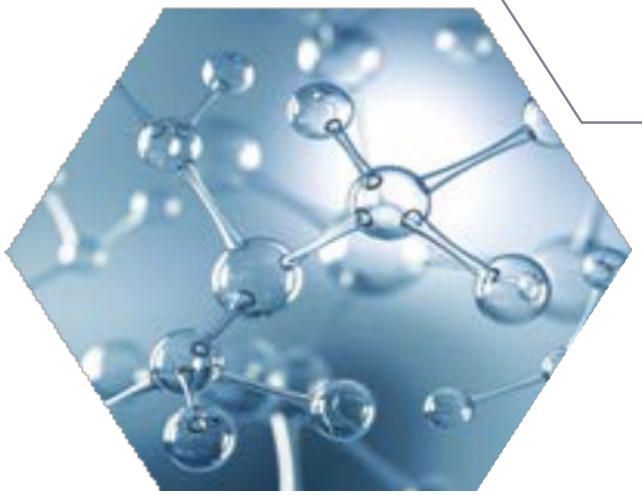


Stepan®

Code of Conduct
Performance with Integrity



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Message From Our President and CEO



Dear Stepan Employees:

Stepan's mission is to meet the requirements of all our stakeholders – customers, stockholders, employees, suppliers and the communities in which we operate. With a keen focus on our customers, we will drive growth, deliver customer-centric innovation and achieve a strong return for our stakeholders.

To achieve that mission, we demand performance with focus, urgency, teamwork and accountability. An important part of being accountable is to remember that our integrity, as a value and central attribute of our business model, is not negotiable and will not be compromised. Remember, this Code of Conduct applies to all of us and helps us understand how we will deliver on our commitment to do business with the highest level of ethics and always in compliance with the law and our corporate policies. We each have an obligation to read and understand our Code. We also have an obligation to speak up if we suspect or are aware of any violation of the Code, the law, or our policies. I will live up to that obligation, and I am counting on you to do the same.

Our commitment to integrity is especially important to keep in mind as we execute Project Catalyst in 2026 and 2027. Even as we take necessary steps to optimize our asset base and create a more productive and agile organization focused on growth, please keep working with safety, compliance and stewardship in mind. Those foundational principles must remain paramount in order to make good on our promise to deliver innovative chemical solutions for a cleaner, healthier, more energy efficient world.

Sincerely,

Luis E. Rojo
President and Chief Executive Officer
Stepan Company

We earn the right to continue to operate every day by doing so in a safe, compliant, and responsible manner.



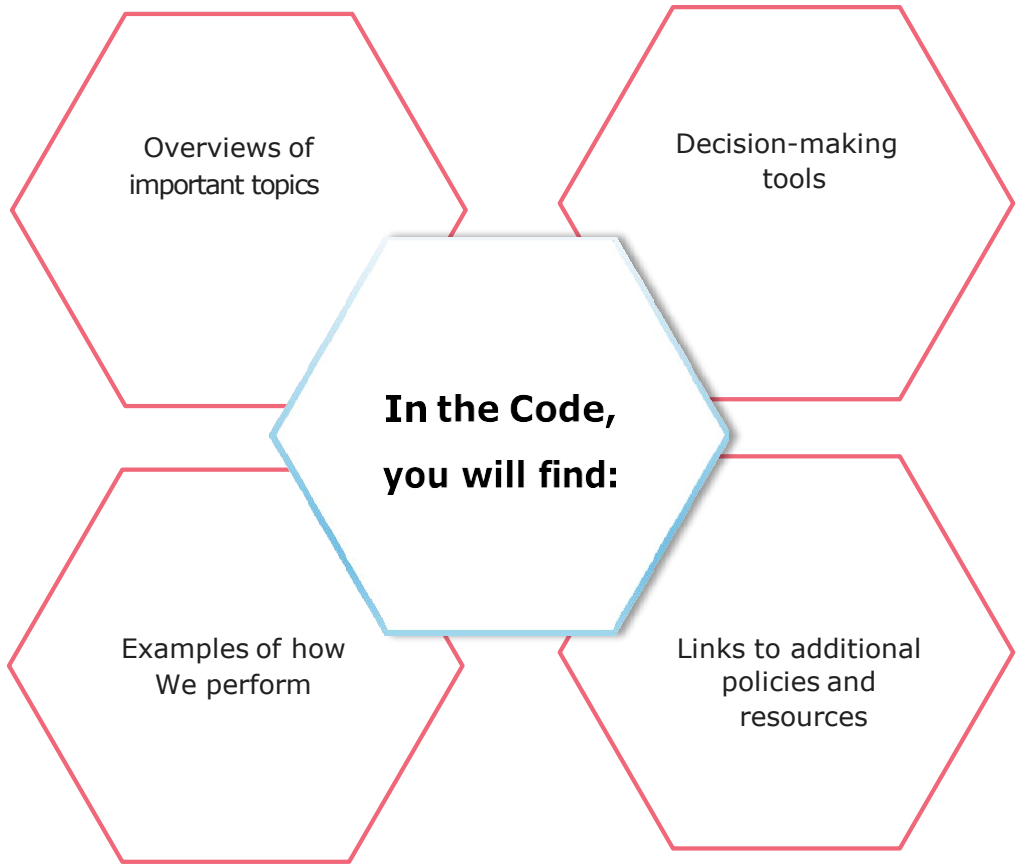
Integrity

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Our Code

Our Code reflects who we are as a company and provides the information you need to perform with integrity – living out our Vision, Mission, and Values – every day. This is important because we operate in a challenging business environment with high performance expectations. Find guidance in the Code and, if you still have questions, look to the additional resources provided in the Code for help.

When you follow the Code, you are doing your part to help create an environment where we all conform to the highest ethical standards.



Our Code applies to everyone who works at Stepan, including full-time and part-time employees in all our locations and our officers, as well as our directors. Further, those who work on our behalf, such as directors, consultants, agents, vendors, suppliers, distributors, business partners, or other third parties, are expected to conform with the spirit of our Code. Any waiver of our Code for executive officers or directors may only be made by the board of directors or a board committee.

We actively monitor compliance with the Code. Anyone who violates our Code could face serious consequences, up to and including termination of employment, civil liability, or criminal charges. Please take your obligation to comply with the Code seriously.

Our Vision, Mission, and Values

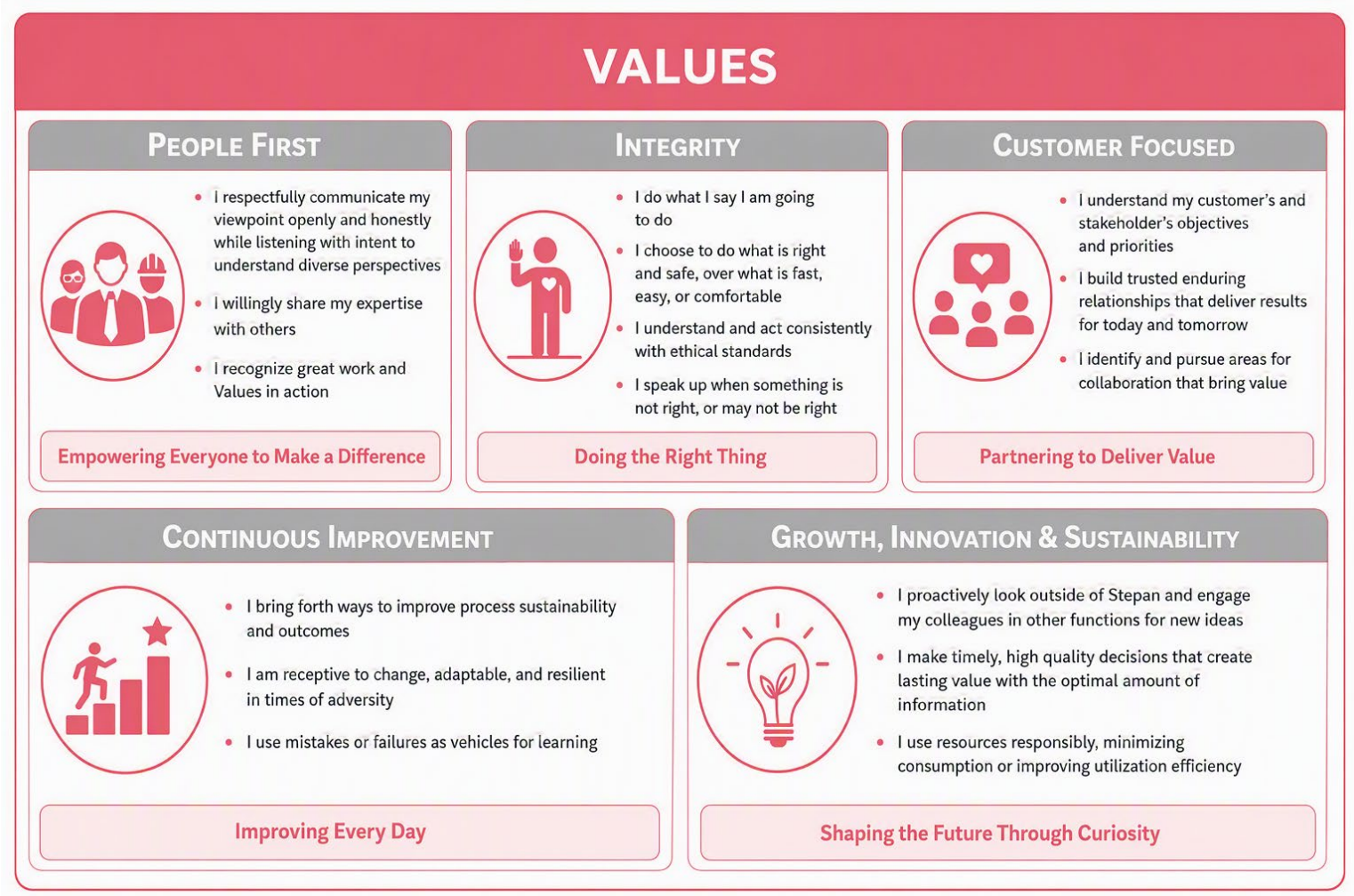
Vision

Innovative Chemical Solutions for a Cleaner, Healthier, More Energy-Efficient World

Mission

The Mission of Stepan is to meet the requirements of all our stakeholders, customers, stockholders, employees, and the communities in which we operate. With a keen focus on our customers, we will drive growth, deliver innovation, and achieve a strong return for our stakeholders by becoming the leading global manufacturer of surfactants and polyester polyols, and a leading supplier of chemical specialties.

In fulfilling this Mission, Stepan will be guided by the following principles and Values:



Employee Responsibilities

All employees share an obligation to:

- Know and follow our Code and any policies, laws, and regulations relevant to their job;
- Handle every interaction with the highest degree of integrity;
- Speak up if misconduct is witnessed or suspected;
- Ask questions whenever there is uncertainty about what to do; and
- Cooperate fully with any investigation.

Leadership Responsibilities

Our leaders have additional responsibilities. If you supervise other employees, you must:

- Exemplify integrity by demonstrably upholding our Code and our Values (you are a role model);
- Refer to relevant Code topics and Values in your communications to your team;
- When you become aware of or suspect there may have been a violation of our Code, escalate to the appropriate source – DO NOT conduct your own investigation; and
- Ensure that employees who have shared concerns in good faith never experience any retaliation.

Making Ethical Decisions

We do not expect you to always know the right thing to do in every situation. If something comes up that you are unsure about, ask yourself:

Should we do it?
- Does it align with our mission and vision?
- Does it reflect our values?

↓

Can we do it?
- Is it legal?
- Is it in line with our policies?

↓

How would it look if made public?
- What if it went viral on social media?
- How would this look in a news headline?

If you answer "yes" to all the questions, it is probably OK to proceed. But if the answer is "no" or even "maybe" to any of these questions, STOP. Do not act until you get advice from your supervisor or another Stepan resource.

Speaking Up – Sharing Concerns

Speak up and share your concerns if you suspect a Code violation or if you have a question about a situation in which you are involved. Speaking up when you suspect misconduct is an obligation that we owe to ourselves and each other and is essential in protecting our reputation.

You have many different resources to use when speaking up, and you should use the method which makes you feel most comfortable. While we encourage you to direct your concerns to your supervisor, you can always speak with another member of management if speaking to your supervisor is not possible. Additional resources you can use to speak up include Ethics & Compliance, Human Resources, or the Legal Department.

In situations where you prefer to place a report anonymously, you are encouraged to use our Helpline reporting system, EthicsPoint, which is accessible online. EthicsPoint provides a secure, browser-based option that connects employees directly with the NAVEX contact center, offering a simple and accessible way to raise concerns. It can be accessed at: https://stepanethicshotline.tnwreports.com/.

After Speaking Up

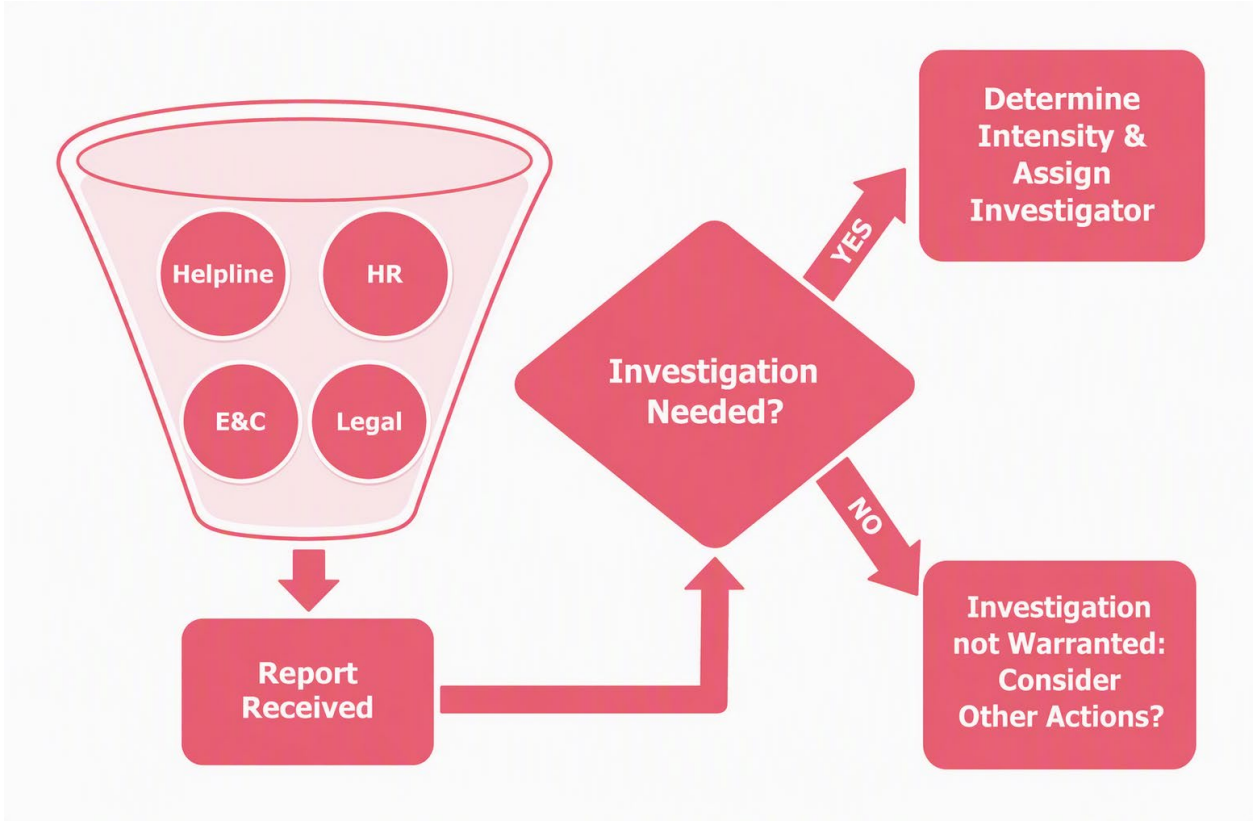
Once you have spoken up or shared your concerns about a possible violation, the Company will review the concern and respond appropriately. Remember, employees are required to fully cooperate in good faith with any investigation. After each investigation, we will take appropriate corrective action and advise reporters and witnesses that the case is closed.



For Stepan employees in the United States, the Helpline is also available via telephone at **844.472.2432**

What happens when a report is made?

Reporting a Concern Intake Process: How It Works



Key Investigative Principles

- **Confidentiality**: To the extent legally permissible, protect the anonymity and confidentiality of information shared by individuals involved in an investigation.
- **Dignity and Respect**: Show respect and consideration for any individual involved in an investigation; foster a safe environment for people to discuss their concerns.
- **Objectivity**: Maintain an open mind and a neutral, objective perspective to the concerns raised.
- **Promptness**: It is imperative that a thorough investigation be completed as efficiently as reasonably possible in order to provide resolution for the parties involved as well as for the business or function impacted by the investigation.
- **Non-retaliation**: Ensure that everyone involved in an investigation understands the Company's policy against retaliation and be sure to guide management accordingly.



"Typical" Investigation: What Happens?

1. **Allegation Raised & Intake:** When a report of concern is received, it is evaluated and, if appropriate, an investigation is initiated.
2. **Assessment & Assignment:** Under the auspices of the IOC, reports requiring investigation are assigned to a lead investigator(s) to conduct the review of the case.*
3. **Investigation Plan & Evidence Gathering:** The lead investigator scopes the investigation, collects and reviews evidence, and coordinates with relevant stakeholders as appropriate. Evidence is collected and reviewed under proper legal and privacy safeguards determined by the subject of the investigation.
4. **Interviews:** Relevant witnesses are then interviewed, including the subject of the complaint/report. Ground rules of truthfulness, cooperation, confidentiality, and non-retaliation are confirmed with each witness.
5. **Findings, Case Report & Remediation:** The lead investigator then writes a case report summarizing the investigation and its findings and proposed remediation. The leaders of HR and E&C then confirm the appropriate remediation including disciplinary action if appropriate (Legal is engaged as appropriate).
6. **Closure & Records:** Once the remedial action is identified, the case is closed. The case file is retained pursuant to Stepan's Investigation Handbook. The lead investigator follows up with the reporter and participants to confirm closure.



ZERO RETALIATION

We will not tolerate any kind of retaliation against anyone who reports a concern (or participates in an investigation) in good faith. Even if your report turns out to be untrue or cannot be verified, you will be protected from retaliation if you stepped forward in good faith.

Remember:

- We never prejudge a complaint or complainant.
- Even charming and intelligent people can do unethical things.
- All people are presumed innocent unless evidence supports otherwise.
- Attorney Client Privilege may apply in certain investigations.

***IOC – (Investigation Oversight Committee):** the governance body that reviews, oversees, and ensures the consistent handling, investigation, escalation, and remediation of allegations that pose legal, ethical, or reputational risks to Stepan.

Our work is guided and given meaning by our Values – by pulling together, giving our best, and staying true to ourselves, we succeed.



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Respect, Diversity & Belonging

We value each other's differences and are committed to a workplace where every employee experiences respect and belonging, and where people feel seen, valued, and able to contribute.

We recognize the benefits that diversity brings and commit to equal opportunity, equitable access, and fair treatment in all aspects of our business, including hiring, development, promotion, and pay.

We regularly review our pay and promotion practices to identify and address unjustified disparities. Never discriminate against any individual based on a protected characteristic. Always make employment-related decisions on relevant factors like performance, qualifications, individual merit, and skills. We recognize that individuals may experience bias based on a combination of characteristics, and we take such concerns seriously regardless of how they are categorized.

We do not tolerate harassment or bullying of any kind, verbal, physical, visual, or online, and we strictly prohibit retaliation against anyone who, in good faith, raises a concern, reports a possible violation, or participates in an investigation.

We provide reasonable accommodations for disability, sincerely held religious beliefs and practices, and pregnancy, childbirth, and related medical conditions, in accordance with applicable law. Employees may request accommodation through Human Resources without fear of retaliation.

We respect employees' rights to freedom of association and collective bargaining, including their rights to choose to join or not to join a trade union, or to have recognized employee representation in accordance with the local law.

We expect every employee to help build a respectful workplace, speak up when something isn't right, and support colleagues who do.



What is a Protected Characteristic?

In addition to the intrinsic value diversity in our workforce provides, the law may prohibit us from making employment decisions that disadvantage certain people. Certain protected characteristics may not serve as the basis for an employment decision. Protected characteristics may include, but are not necessarily limited to:

- Age
- Caregiver or family responsibilities
- Citizenship or immigration status
- Disability
- Gender, gender identity, or gender expression
- Genetic information
- Marital or family status
- Medical condition
- Military or veteran status
- National origin or ethnicity
- Pregnancy, childbirth, or related medical conditions
- Race, color, ethnicity, or traits associated with race
- Religion or belief
- Sexual orientation

How We Perform

We take pride in our diverse team, and we believe the unique talents, experiences, and perspectives we each bring help the Company stay innovative and perform at its best. Belonging is how we turn that diversity into impact, when people can be themselves, they do their best work.

Making Ethical Decisions

Q. I applied for a position with another team but learned it was offered to a less-qualified person. I think the reason was because the hiring supervisor wanted someone younger. What should I do?

A. If you suspect you were discriminated against based on your age or another protected characteristic, speak with someone in the Ethics & Compliance Department, or Human Resources Department as soon as possible. We require that all employment decisions be based on legitimate, non-discriminatory criteria.



Harassment-free Environment

We value a positive and supportive workplace, because it motivates us to do and be our absolute best. We are committed to creating an environment where every employee can do their job with dignity and respect, and without fear of harassment, intimidation, or retaliation. Harassment of any kind is inconsistent with our values and will not be tolerated.

What Is Harassment?

Harassment is unwelcome conduct that interferes with an employee's ability to do their work. Harassment can involve sexual conduct or references to personal characteristics including gender, age, race, ethnicity or national origin, and sexual identity or preference. The examples below are illustrative, not exhaustive. Conduct does not have to appear on this list to violate this policy.

How We Perform

We appreciate the contributions of every employee and treat everyone with dignity and respect.

Making Ethical Decisions

Q. I overheard a supervisor berate one of her employees in the cafeteria. The employee left with tears in his eyes. What should I do?

A. Report the incident promptly and in detail to your supervisor, Human Resources, the Ethics and Compliance Department, or the anonymous Ethics Helpline. Verbal abuse is inappropriate and will not be tolerated. In addition, consider:

- Checking in privately with the affected employee to let her know what you observed and that support is available
- Knowing that as a witness, you are also protected from retaliation under this policy

Verbal harassment	Physical harassment	Visual harassment
Demeaning or derogatory jokes	Pushing or shoving	Offensive cartoons, memes, or images
Racial, ethnic, or other slurs	Unwanted sexual advances or contact	Offensive emails, texts, or chat messages
Threats or intimidation	Unwanted or inappropriate touching	Offensive drawings, screensavers, or pictures
Name-calling or bullying	Hitting or kicking	Foul or obscene gestures
Crude remarks or offensive language	Forcible restraint	Inappropriate posts on social media directed at colleagues
Persistent exclusion or public humiliation	Blocking someone's path	Sharing or displaying sexually explicit material

Learn More

Harassment-free Environment Policy

Health, Safety, and Security

We value a healthy, safe, and secure workplace, and are committed to a zero-incident culture because we want everyone to return home unharmed every day. To promote a healthy, safe, and secure workplace, Stepan employees must stay alert and follow all health, safety, and security policies, rules, regulations, and laws.

Immediately report all workplace injuries and other incidents. You are an empowered environmental, health, safety, and security leader within the scope of your work, and beyond. Do your part to prevent hazardous conditions and behaviors, or potential non-compliances. Keep eyes and mind on task and be aware of increased risks when rushing, being frustrated or fatigued.

Making Ethical Decisions

Q. I was recently prescribed a medication that has the potential to make me drowsy at work. It's not as if I would be working under the influence of an illicit drug. Do I need to say anything?

A. If your drowsiness could put you or others in danger, you must discuss this matter with your supervisor or someone in the Human Resources Department to determine if a plan is needed to ensure you don't put yourself or others at risk.

Q. You are preparing to load a tanker with Stepan product. The driver says he checked and the tanker is ready. Should you take his word for it or follow our pre-loading protocols?

A. It is our responsibility to ensure that all safety protocols have been followed every time. In this case, check every valve to make sure we will have no loss of containment when product is loaded into the tanker.

RESPONSIBLE CARE™
Driving Safety & Sustainability

How We Perform

We put health and safety first, recognizing that our most important job is to look out for each other.

How to Promote a Safe and Secure Workplace

To put health, safety, and security first, stay alert and:

- Wear personal protective equipment as required;
- Comply with Stepan's EHS&S Policy standards and procedures;
- Never work impaired by the use of drugs or alcohol;
- Immediately report any at-risk behaviors or conditions, work-related injuries or illnesses, or other health, safety, and security incidents;
- Complete all required EHS&S training timely;
- Report any threatening or intimidating behavior;
- Do not share keys, access cards, passwords with anyone else;
- Lost access cards, IT equipment, compromised accounts MUST be reported to Stepan IT immediately;
- Violent behavior and possessing any weapons (subject to applicable laws) are strictly prohibited; and,
- Speak up about any safety concerns and actively contribute with suggestions for how to improve safety

Learn More
Environmental, Health, Safety
Security Policy SOP for Active Shooter Hostile Intruder

Recordkeeping

We value financial integrity because it enhances our reputation and builds credibility with external stakeholders and keeps us in compliance with the law. Help maintain the integrity of our business records. In every transaction, whether you are filing an expense report or simply recording your time, be honest, clear, accurate, and complete.

Be aware that there may be enhanced recordkeeping requirements for transactions with certain third parties who might be government officials or who perform certain tasks on our behalf.

Always accurately and completely characterize every transaction, or other business record. Communicate any items that may not be properly disclosed or recorded to management for further review/analysis.

Follow our records-retention policies and never dispose of any information that is subject to a ***legal hold*** or that otherwise relates to an active investigation, audit, or inspection.

What are Business Records?

Business records include any document or data (whether in paper or electronic format) related to a business and include, but are not necessarily limited to:

- Accounting Reports
- Contracts, bids, and proposals
- Emails and internal third-party correspondence
- Expense and purchase card reports
- Inventory reports
- Meeting minutes
- Regulatory filings
- Shipping and customs reports
- Timesheets
- Vendor invoices
- Laboratory notebooks
- Production records and data

What is a Legal Hold?

A legal hold is a requirement to preserve relevant records and information when litigation is reasonably anticipated. ***NOTE: You will be notified if your records become subject to a legal hold.***

How We Perform

We make sure our books and business records accurately reflect the financial state of our business and every transaction.

Making Ethical Decisions

Q. I am responsible for approving expenses from numerous employees who report to me. Do I need to review each expense, or can I trust that the expenses are legitimate and accurate?

A. You should review each expense to determine whether it is legitimate, accurately recorded, and appropriately supported. If an expense appears unusual in any way, seek clarification from the employee. Signing off on expense reports without reviewing them could be considered a form of falsifying records.

For more specific information about different types of records, please refer to Stepan's Record Retention Policy.

Audits and Government Investigations

We value honest and transparent government relationships because they help ensure we adhere to the highest ethical standards and the law.

Respond appropriately to any reasonable government request. Notify the Legal Department of any non-routine governmental investigation or request for information immediately, and always, in consultation with the Legal Department, provide complete, timely, and accurate information to the government when required – retaining copies of anything shared.

Always accompany a government official or any visitors to our facilities and take photographs of what they review. Note any documents or items they review or seize and attempt to make sure accurate copies are retained.



How We Perform

We address government audits and investigations with the same integrity applied in our day-to-day operations.

Physical Security and Company Assets

We value the company's physical, electronic, financial, and other assets because they are essential to our success.

As a Stepan employee, you share a responsibility to safeguard the ***Stepan assets*** that are provided or entrusted to you throughout the course of your employment. Protect these assets from theft, fraud, loss, carelessness, and abuse by using them for their intended business purposes only and by acting in accordance with our policies.

Observe established security practices and immediately report any security threats to people or physical, electronic, intellectual property (IP), and financial assets.

What are Physical Assets?

Physical assets are material items of value that belong to Stepan, such as:

- Buildings
- Cash
- Equipment
- Inventory
- Office furnishings
- Office supplies
- Properties

What are Electronic Assets?

Electronic assets include anything accessed or stored in electronic form, such as our:

- Data
- Databases
- Emails and Chat
- Network
- Software
- Internet access

What are Financial Assets?

Financial assets are non-physical items of value that add to our business, including:

- Bank deposits
- Bonds
- Cash equivalents
- Equity instruments
- Stocks

What are IP Assets?

Ideas, inventions, or processes that have been created by Stepan employees or contractors, such as:

- Trade secrets
- Product recipes
- Trademarks and copyrights
- Patented inventions (products or processes)

NOTE:
Any data (including that generated by AI) created by Stepan employees in the course of work for Stepan, using Stepan assets, or involving Stepan data or information, is the property of Stepan.

Protecting Physical, Electronic, IP and Financial Assets

Use our physical, electronic, IP, and financial assets for business purposes only and always remember to:

- Tell your supervisor if you come across equipment that is damaged, unsafe, or in need of repair;
- Only grant third parties access to Stepan sites or information when approved in a manner consistent with corporate policies;
- Receive proper authorization before borrowing, lending, giving away, or selling any asset;
- Update passwords and security software as directed;
- Physically secure your office, workstation, laptops, and mobile devices by locking items and shutting systems down when stepping away;
- Stepan retains the right to periodically monitor, access, and disclose the contents of our computer systems, networks, and Company-provided electronic devices, and to block access to non-business-related internet sites and applications where permitted by law; and
- Use caution when using artificial intelligence (AI) tools and only upload Stepan data or information to authorized platforms. Copilot is the only AI tool approved for ingesting Stepan data.
- Prohibited external AI tools are any AI services other than Microsoft 365 Copilot, including public or consumer AI websites, AI features in non-Microsoft apps, third-party or vendor tools (ChatGPT, Gemini, etc.), and personal or free AI tools used outside Stepan systems. Avoid using unapproved AI tools or services; Microsoft 365 Copilot is the only authorized Generative AI platform for use with Stepan data.

How We Perform

We use good judgement when handling Company assets and treat them as if they are our own.

Q. You badge into a Stepan building and before the door shuts behind you, a person starts to walk through without badging in. Do you need to do anything?

A. Do not allow people to "tailgate" behind you. Each person entering Stepan buildings should present ***THEIR*** own badge, key, or form of identity.



Cybersecurity

We value cybersecurity because it helps ensure the confidentiality, integrity, and availability of essential assets and information. Cybersecurity is a shared responsibility focused on reducing the risk of cyberattacks and cyber-aided fraud through strong controls, sound procedures, and consistent cyber hygiene.

Each of us plays a critical role in protecting Stepan's assets. While technology provides important safeguards, employees represent the last line of defense against cyber threats. Ongoing awareness, vigilance, and attention to warning signs help form a strong "human firewall" that protects our organization.

We must keep our electronic resources and systems safe by practicing good cyber hygiene, understanding common cyberattack and fraud techniques, handling information carefully, and acting thoughtfully and responsibly when using Stepan technology or data.

How We Perform

We are committed to maintaining a secure digital environment. Cybersecurity is a shared responsibility, and your vigilance plays a crucial role in keeping our systems and data safe.

What Are Cyberattacks?

Cyberattacks are attempts by malicious actors to disable, damage, or destroy a computer network or system. Examples include:

- Phishing (emails that ask users to click on a link and enter their personal data);
- Malware (e.g., Trojans, viruses, and worms) distributed through email attachments and unauthorized applications;
- Ransomware (malware that threatens harmful activity, e.g., publishing personal or corporate data, or locking access to files unless a ransom is paid);
- Password attacks (attempts to access our systems by cracking a user's password, or reutilizing passwords found in major data breaches);
- Denial-of-service attacks (attempts to send so much data or traffic to a network that it no longer functions);
- Man-in-the-middle attacks (attempts to impersonate others in an online information exchange to access personal information or other data);
- Drive-by downloads (downloads of malware on a website that infects anyone who visits the site);
- Rogue software (malware that masquerades as legitimate and necessary software that will keep a system safe);
- Business email compromise (BEC) (fraud-based attacks that use compromised or impersonated email accounts to deceive employees into transferring funds, approving transactions, or disclosing sensitive business information);
- Credential compromise and password breaches (attacks that steal, guess, or reuse usernames and passwords to gain unauthorized access to systems, data, or email accounts, often enabling further fraud or data theft);
- Cyber fraud and impersonation attacks (attempts to trick individuals into authorizing payments, sharing sensitive data, or changing account details through deception, including business email compromise);
- Data theft resulting from unauthorized data sharing (the intentional or unauthorized exposure, exfiltration, or misuse of sensitive information caused by social engineering, compromised credentials, improper file sharing through unapproved SaaS tools, forwarding sensitive data to personal email accounts, or other actions exploited by malicious actors).

How to Protect Against Cyber Attacks

- Use strong and confidential passwords, keeping the following tips in mind:
  - Use passphrases. They are easier to remember and harder to crack.
  - Use different passwords for different systems with the help of a password manager.
  - Never share or write down your passwords.
  - Ensure your email password is particularly strong and unique.
  - Enable two-factor authentication when possible.
  - Never use real answers to security questions (e.g., where you were born).
- Avoid clicking on links or downloading attachments from unknown senders.
  - When in doubt about whether it is ok to open a link or attachment, ask the IT department.
- Critical data is backed up regularly in case of a cyberattack; do not disrupt any data backups.
- Keep software up to date and never disable your desktop firewall.
- Report suspicious activity immediately, if you notice anything unusual such as unexpected login prompts, suspicious emails, or unauthorized access attempts—report it right away.
- To report phishing attempts, use the "Mimecast" button in Outlook. Reporting suspicious emails helps identify and block similar attacks circulating to other employees, improves company-wide email filtering, and allows you to manage your Safe Senders List.
- Verify unusual requests from a senior leader that should be a red flag for potential social engineering. Confirm any such requests directly with the senior leader or their assistant in a different, trusted communication chain (e.g., Teams IM).
- Do not install applications/software without approval from IT.
- Never use an outside cloud service (e.g., Google docs, Dropbox, GitHub, etc.) to process, share, store, or otherwise manage Stepan data without written approval from IT.
- If you are locked out of your work computer with a request for payment, immediately disconnect from the network and report the incident to IT Service Desk.

Learn More
Use of Information Technology Policy
Use of Artificial Intelligence Policy

Contact IT Security at infosec@stepan.com or reach out to the IT Service Desk via https://stepan.service-now.com/sp.

Data Privacy and Confidential Information

We value the preservation of privacy because it helps protect our brand and maintain trust.

Store private and confidential information properly and keep it secure whether it belongs to us or to third parties.

Never share confidential information, such as intellectual property and personally identifiable information, with anyone who does not need it to do their job, or without the proper authorization.

What is Confidential Information?

Confidential information is information that is not known to the public that might be of use to competitors or harmful to our Company or our customers if disclosed. It can include:

- Sales and marketing information, such as customer information and contract terms
- Financial information, such as costs and profit margins
- Strategic information, such as planned acquisitions and divestitures
- Supplier information, such as supplier lists and quality data
- Human resources information, such as employment, wage, and salary data of other employees

How We Perform

We understand that value of confidential information and our responsibility to protect it.

What is Intellectual Property?

Intellectual property is a type of confidential information. It includes:

- Business methodology
- Copyrights
- Documents and proprietary information
- Know-how
- Marketing secrets
- Patents
- Proprietary routines
- Systems
- Trade names
- Trade secrets
- Trademarks



What is Personally Identifiable Information?

Personally identifiable information is another type of confidential information. It covers information that identifies a person or could make it possible to identify a person in the future, such as someone's:

- Email address
- Employment history
- Identifying number

  (e.g. Social Security, Passport or Driver's License)
- Name
- Physical address



Protecting Privacy and Confidential Information

It may not always be obvious what information needs to be protected. To avoid improper use or disclosure, do the following:

- If you do not know whether certain information qualifies as confidential information, seek clarification from your manager, Ethics & Compliance, HR, or the Legal departments before disclosing.
- Never use your personal email account to conduct Company business or share confidential information without the approval of the Chief Compliance and Risk Officer.
- Do not discuss confidential information in public places where others can hear.
- Confidential information should only be accessed to conduct Company business.
- Honor confidentiality agreements and never share the confidential information of others with any third-party.
- Immediately report suspected theft or abuse of confidential information to your supervisor.

Learn More

Personal Information Protection Policy

Integrity in the marketplace means we always honor our word and play by the rules.



Marketplace

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Anti-bribery and Anti-corruption

We value adherence with laws prohibiting bribery and corruption because it demonstrates our commitment to the highest degree of business ethics.

Never offer, give, promise, or receive anything of value to get or keep business, or to improperly influence a business decision. These acts would be considered forms of ***bribery or corruption***.

Stepan operates internationally, and we are subject to many different anti-corruption laws. Specifically, the United States' Foreign Corrupt Practices Act (FCPA) and the United Kingdom's Anti-Bribery Act prohibit bribery and corruption and apply to everyone at Stepan globally. The consequences for violating these laws can be severe for both you and Stepan, so follow all applicable laws and never engage in any activity that could even appear improper.

What is Corruption?

Corruption is any abuse of power for business or personal gain, such as giving or receiving bribes. It is important to remember that bribes are not limited to cash and can include the improper exchange of:

- Cash equivalents (e.g., gift cards)
- Charitable or political contributions
- Discounts
- Entertainment
- Favors
- Gifts
- Jobs or internships
- Meals

Avoiding Corruption

When considering the exchange of anything of value, do the following:

- Ensure the exchange would be reasonable under the circumstances.
- Follow our third-party on-boarding and screening requirements every time (see below).
- Monitor third parties closely for any corruption red flags.
- Be extra cautious when working with government officials. Contact Ethics & Compliance with any questions.
- Immediately report suspected violations of our Code, our policies, or the law.

Before hiring a new third-party that may interact with the government on our behalf, ensure that the third-party is screened through our due diligence procedures.

Finally, do not offer or give anything of value to a ***government official*** without pre-approval from our Ethics & Compliance Department.

What is a Government Official?

The term "government official" is broad and applies not only to elected officials, but also to employees of government agencies and government-controlled companies or entities (e.g., government-owned oil companies, utility companies or railroads).

Even officials in political parties or members of a royal family may be government officials. If you have a question about whether someone is a government official, contact the Ethics & Compliance Department as soon as possible.

Learn More
Anti-bribery and Anti-corruption Policy

How We Perform

We earn the loyalty of our customers based on the merits of our products, people, technical services, and innovative capacity, not because of bribes or kickbacks.

Making Ethical Decisions

Q. An employee for the electrical utility (which is owned by the national government) is on-site at our plant after an outage. She tells Stepan's maintenance team that she can accelerate the project of restoring power if we donate some equipment to a local charity she leads. Can we make the donation to accelerate the restoration of power?

A. No. Any request that anything of value be given to a government official (including at their direction to another party) is a potential violation of the FCPA or other anti-corruption laws. Contact the Ethics & Compliance Department or Legal Department immediately in a situation like this.



Anti-money Laundering

We value legitimate business activity because it keeps our Company, customers, and communities safe.

Do not participate in transactions that give those who make money in illegal, illicit, or immoral ways the opportunity to hide its criminal origin. That would be considered ***money laundering***.

Always use good judgment, know your customers, and only conduct business with reputable third parties engaged in legitimate business activities. Only do business with third parties who have been screened through our due diligence process.

What Is Money Laundering?

It is a process that criminals use to move funds gained from illegal activity through legitimate businesses to make the funds appear legitimate.

You can often spot attempts at money laundering by identifying questionable transactions. They can include:

- Attempts to pay large amounts of money in cash;
- Requests to ship to a country other than where the payment originated;
- Attempts to avoid recordkeeping requirements;
- Payments made by individuals or companies who are not parties to the transaction; and
- Sudden changes made to the pattern of a customer's transactions.

Stay alert and take action by reporting any of the above behaviors or other suspicious activity.

How We Perform

We help discourage crime and terrorism by complying with anti-money laundering, anti-crime, and anti-terrorism laws in the countries where we operate.

Making Ethical Decisions

Q. One of our customers recently sent a payment from their CEO's personal account instead of their company account. What should I do?

A. Contact the customer for details. If the responses you receive do not make sense or are unsatisfactory, speak with your supervisor or someone from the Ethics & Compliance Department or Legal Department so the questionable transaction can be investigated further.

Third-Party Engagements

We value third parties who meet our high standards because their actions reflect directly on us, and we can be held responsible for actions they might take on our behalf.

Stepan seeks to work with partners that reflect our Values and standards. Third parties include:

- Agents
- Business partners
- Consultants
- Contractors
- Customers
- Distributors
- Suppliers
- Representatives
- Any entities operating on behalf of Stepan as third parties

It is your responsibility to exercise good judgment when selecting third-party organizations with whom we conduct business. Perform proper due diligence and make choices based on objective criteria such as quality, service, price, experience, sustainability, and reliability.

When contracting with third parties, maintain transparency by making sure all terms are in writing and that they clearly and accurately describe the agreement, including the services to be performed.

Appropriately monitor third parties you work with. They are expected to adhere to our Third-Party Code of Conduct, which is available on our website, in its entirety. Failure to do so may result in termination of our relationship.

How We Perform

We seek out third parties who work honestly, ethically, and share our commitment to best-in-class service.

Third-Party Risk Management

Stepan requires that all third parties undergo a screening process prior to initiation of payments or contracts. Screening helps identify issues prohibited under Stepan's Third-Party Code of Conduct, such as illegal labor and human rights practices or other conduct, and inappropriate environmental, health, and safety performance.

Once in place, the third-party will be continuously monitored for violations that may put Stepan at risk if not addressed. If you make decisions around doing business with third parties, you are responsible for ensuring that they are subject to appropriate levels of screening and diligence in the management of that relationship in accordance with our policy. If you have questions about how to comply with this responsibility, consult our Third-Party Risk Management Policy or the Ethics & Compliance Department.

Making Ethical Decisions

Q. I just heard about one of our suppliers possibly participating in dishonest accounting practices. They don't affect Stepan directly, so do I need to do anything?

A. Yes. We only work with those who operate ethically. And although the supplier's practices may not always directly affect us, they could subject us to reputational harm. Report the matter right away to your supervisor or the Ethics & Compliance Department.

Learn More
Third-party Risk Management Policy

Conflicts of Interest

We value loyalty* to our Company** because it promotes our shared success. Never allow personal interests or relationships to affect your ability to make objective business decisions and never use your position or Stepan assets for personal gain. When that happens, it is a ***conflict of interest, and even the appearance of a conflict can reflect negatively on Stepan.

What Are Conflicts of Interest?

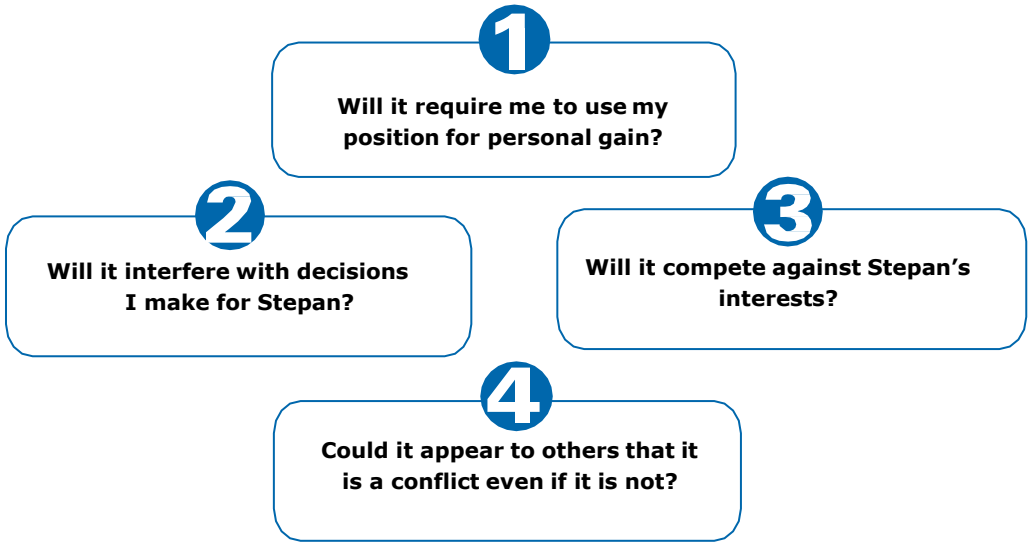
There are many situations that can lead to a conflict of interest. It is impossible to list them all, but common examples include:

- Competing with Stepan or taking advantage of opportunities discovered through your work with Stepan (e.g., using Company property for personal gain);
- Having an inappropriate interest in or conducting outside work with a business partner, competitor, or any other organization that does (or seeks to do) business with Stepan;
- Exchanging excessive gifts or entertainment with people or companies that do (or seek to do) business with Stepan;
- Receiving improper benefits as a result of your position with Stepan;
- Engaging in any outside work that could interfere with your ability to do your job; and
- Supervising or making employment decisions about a friend, family member, or someone with whom you have a personal (e.g., romantic) relationship.

Learn More
Conflicts of Interest Policy

Spotting a Conflict of Interest

Because this list is not exhaustive, before pursuing a relationship, interest, or activity that could benefit you or someone you know, ask yourself:



If you respond to any of these questions with "maybe," or "I'm not sure," then the situation may present a conflict of interest.

You must disclose all conflicts or potential conflicts to your supervisor immediately. Once disclosed, we can often take steps to address or eliminate the conflict.

How We Perform

We strike the right balance between our work lives and our personal lives, and we know and avoid the kinds of situations where conflicts can arise.

Fair Competition and Antitrust Compliance

We value free and fair competition because it is vital to a healthy marketplace.

Be careful in all situations where there is a potential for engaging in unfair competition. Avoid collaboration with competitors or anything that could give the appearance of an improper agreement.

Never attempt to acquire competitive information unfairly or illegally. Instead, use legitimate (e.g., public) sources and speak with a supervisor if you have any questions.

What are Unfair Competition Practices?

Some examples of unfair competition practices include:

- Discussing prices, terms and conditions of sale, discounts, credit terms, or similar subjects with competitors;
- Being dishonest about the quality, features, or availability of our products;
- Restricting production, sales, or output;
- Coercing customers into buying unwanted products as a condition of purchasing other products;
- Dividing markets, customers, or territories among competitors;
- Preventing other competitors from entering the market; and
- Refusing to deal with a particular customer or supplier in coordination with competitors.

Keep in mind that competition laws vary by country. Contact the Legal Department with questions about relevant laws.

Making Ethical Decisions

Q. I am at an industry conference and a couple of our competitors invited me to dinner. They said that we should all discuss "territory strategy" so that we can get through a current slump in sales. How should I respond?

A. You should decline the invitation. We never discuss territory division with competitors because it would violate our policies and likely the law. Share with the competitors your objection to the discussion, then report their request to the Legal Department as soon as you are able.

Trade association and industry gatherings pose special risks because they bring together competitors, increasing the risk of a discussion about competitively sensitive matters. Use good judgment at these gatherings to avoid discussions that could violate competition laws.

How We Perform

We let our ability to outperform our competitors – not unfair business practices – drive our success.

Learn More

Fair Competition and Antitrust Compliance Policy

Gifts & Entertainment

We value the exchange of appropriate business courtesies (gifts or entertainment) because they help foster positive professional relationships.

When exchanging business courtesies, know what is considered an ***appropriate courtesy*** versus ***an inappropriate courtesy***. Only offer or accept something of value when doing so would be considered legal, ethical, and reasonable.

Certain business courtesies, like nominal gifts during the holidays and business lunches, can help foster healthy relationships. However, giving or receiving anything unreasonable or inconsistent with our policies can create an appearance of impropriety or a conflict of interest.

It can sometimes be difficult to determine whether an offer or exchange is inappropriate. If you are not completely certain, reach out to your supervisor or the Ethics & Compliance Department with your questions or concerns.

What Is an Appropriate Business Courtesy?

It can be a gift or offer of entertainment or hospitality that:

- Offers a reasonable and appropriate thank you;
- Starts or enhances a relationship.
- Demonstrates appropriate good will during holidays; or
- Promotes a brand or product.

What Is an Inappropriate Business Courtesy?

It can be a gift or offer of entertainment or hospitality that:

- Is significant enough to give an appearance of impropriety;
- Creates an obligation in return;
- Is given to win favors;
- Comes in the form of cash or a cash equivalent (like a gift card); or
- Is excessive under the circumstances.

How We Perform

We win business based on the merits of our products and services, and we make decisions regarding suppliers and partners the same way.

Learn More
Gifts and Entertainment Policy



Insider Trading

We value compliance with insider trading laws because it maximizes our shareholder value and increases efficiency in the securities markets.

In the course of your work, you may come into contact with ***inside information***, or information that has not been released to the public and that a reasonable investor would consider important in making a decision to buy, sell, or hold securities (e.g., stock) of a company. Whether that inside information is about Stepan or another public company, do not trade on it or engage in any other action to take advantage of that information. This is called insider trading and is a criminal act.

Also, do not share inside information with others, such as friends and family, so that they can trade on it. This is called tipping and can create criminal liability for both the person giving the tip and the person acting on it.

How We Perform

We help maintain trust in the marketplace and ensure equal access to information, giving everyone a fair chance to invest with our Company.

What is Inside Information?

Some examples of potential inside information include:

- New or developing products
- Marketing strategies
- Financial earnings or losses
- Guidance on earnings estimates
- Changes in auditor or notifications that a company may no longer rely on an audit report
- Substantial changes in accounting methods
- Events regarding a company's securities
- Bankruptcies, receiverships, or financial liquidity problems
- Regulatory approvals or changes
- Significant potential business deals
- Significant developments regarding customers, suppliers, or other third parties
- Significant industry information
- Senior management changes
- Proposed mergers, acquisitions, or other significant transactions
- Potential or actual legal action or investigations
- Significant labor negotiations or disputes

The consequences for violating insider trading laws can be severe, including fines or imprisonment. If you have questions about what kind of information is inside information and how to avoid insider trading, contact the Legal Department.

Making Ethical Decisions

Q. My team is working on a potential acquisition. In my excitement, I hinted that my sister should hold on to her Stepan stock and maybe even buy more. I didn't tell her why. Have I done anything wrong?

A. Yes. The information you shared is based on inside information, which could put both you and your sister at risk of violating insider trading laws. Report your disclosure to the Legal Department immediately.

Learn More
Insider Trading Policy



We serve more than customers. We serve communities – striving for transparency, trust, and reliability in all we do.



Communities

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Environmental Protection and Sustainability

We value the responsible use of natural resources and understand both our dependence upon these resources for continued business and our responsibilities to reduce our impact on those resources, so they continue to provide social and environmental benefits into the future. We strive to provide ethical stewardship, both to our organization and our planet.

Every employee must work in an environmentally responsible manner. Do this by complying with all environmental laws and regulations, minimizing your carbon footprint, and looking for ways to address sustainability challenges through your particular area of work.

Keep in mind that Stepan is a proud member of the American Chemistry Council and a charter member of its ***Responsible Care®*** initiative.

How We Perform

We work to make lives better – not just for our customers and us, but for the communities in which we operate, the world, and future generations.



What is Responsible Care?

Responsible Care is an initiative adopted by the United States chemical industry to safely handle products from inception in the research laboratory, through manufacture and distribution, to ultimate use and disposal.

Responsible Care requires member companies to continually improve their health, safety, and environmental performance. Stepan accomplishes this by:

- Operating our plants and equipment within legal limits;
- Adhering to the Responsible Care Management System® (RCMS®);
- Listening and responding to public concerns;
- Assisting each other to achieve optimum performance; and
- Setting goals and reporting progress.

RESPONSIBLE CARE™
Driving Safety & Sustainability

Reducing Environmental Impact

There are several ways to reduce your environmental impact. Be sure to: conserve, recycle, and reuse natural resources whenever possible:

- Identify and report leaks, spills, or other issues that might lead to waste or inefficiencies;
- Use your expertise to identify and share opportunities for improvements;
- Drive in ways that reduce your environmental impact, such as maximizing transport loads;
- Divert waste streams for reuse;
- Use double-sided printing to save paper;
- Turn off any devices on your desk, like monitors and lamps, before leaving the office;
- Choose energy-efficient settings and energy-efficient devices when possible;
- Work with third parties who share our commitment to environmental responsibility; and
- Identify and act on opportunities to reduce waste and to conserve energy and water in our manufacturing processes.

Making Ethical Decisions

Q. I recently learned that one of our product's storage tanks has a design flaw that may cause it to leak fluids that can harm the environment. What should I do?

A. You should speak up. Whenever you learn of a practice that could have a negative impact on the environment, tell your supervisor right away and be sure the observation is properly reported and recorded.

Q. I'm new to my position, but I have been observing our processes, and I know if we change our process just a little, we could cut the wastewater we use in half. I don't want to make waves since my boss did this job for years before I was hired. What should I do?

A. Always tell your manager about an idea like this. A Stepan leader will be excited about implementing a process that might improve our sustainability, whether they thought of it or not.

Social Responsibility and Human Rights

We value community involvement and the protection of human rights because they promote health, welfare, education, and other causes that our employees are passionate about and demonstrate our commitment to good corporate citizenship.

Demonstrate the utmost respect for human rights and comply with all applicable policies, laws, and regulations, including those relating to working conditions and safety.

Never knowingly do business with any individual or company that participates in ***human rights abuses*** and if you suspect an employee or business partner of engaging in such activity, report it immediately to the Ethics & Compliance Department or Legal Department.

Human rights abuses can include:

- Forced labor
- Child labor
- Human trafficking or slavery
- Physical punishment
- Unequal treatment
- Unfair wages
- Unlawful discrimination (including discrimination on the basis of gender or minority status)
- Unsafe working conditions
- Impacting indigenous rights without consultation or free, prior, and informed consent

How We Perform

We recognize our responsibility to manage not only our corporate performance, but also our social impact.

Making Ethical Decisions

Q. I heard that a third-party we are considering partnering with has a reputation for engaging in questionable labor practices, but I'm not involved in the selection process. Should I say anything?

A. Yes. Whenever you learn about an activity that goes against our policies or our Values or could reflect negatively on Stepan, speak up. Let your colleagues who are involved in the decision know what you learned.

Learn More
Human Rights Policy

Political Activity and Contributions

We value participation in the political process because of the critical role it plays in giving us a voice in the communities where we live and work.

Feel encouraged to engage politically in ways that are lawful and consistent with our policies – keeping in mind that such activities should not interfere with your work responsibilities and should be separate from your association with Stepan.

Always make it clear that you are speaking and acting on your own behalf, and support political parties, office holders, candidates, and causes in ways that do not involve the use of Company time, funds, or resources.

Keep in mind that you are not authorized to make political contributions on behalf of Stepan (including the in-kind use of Stepan property) or communicate with political entities or officials without the pre-approval of the Chief Compliance and Risk Officer or the General Counsel.

Also, keep in mind that we value the diversity of viewpoints on our team. Never pressure coworkers to support causes you care about.

How We Perform

We believe that participating in the political process is part of being a good citizen, and we do so in ways that respect the various viewpoints of our team.

Making Ethical Decisions

Q. I was invited by a local news station to discuss work that I have been doing on a political campaign. The station wants to introduce me by providing my name, occupation, and place of work. Is this, OK?

A. You are right to be concerned, but this might be OK. Reach out to your supervisor, the Ethics & Compliance Department, or the Legal Department first to get approval and then, if approved, ensure that your participation complies with our policies. Make it clear that any opinions you express are your own.



Market and Advertising

We value integrity in marketing and advertising because it helps ensure customers have the best and most accurate information about our products.

Provide accurate, fair, and balanced information when communicating about our Company and our products, highlighting the benefits, and pointing out any risks associated with their use.

Sending the Right Message

Only speak on Stepan's behalf to the extent you are authorized to do so. When communicating with existing or potential customers or buyers, do your part to promote our products with integrity by:

- Fact checking and verifying any claims;
- Making sure all advertisements and promotional materials are reviewed and approved before their use through our internal approval process;
- Making sure any written or visual depictions accurately reflect the products we offer;
- Insisting on accuracy, never mischaracterizing or misleading, and citing sources as necessary;
- Making sure our products are promoted only for uses approved/cleared by applicable regulatory bodies in the countries where the products are sold; and
- Ensuring that all branded materials comply with Stepan's brand guidelines.

How We Perform

We market and advertise our products in ways that help tell our story honestly.

Making Ethical Decisions

Q. I am putting together promotional materials, and I want to highlight a use of one of our new products that I believe is truthful but not yet backed by significant research. Would that be, OK?

A. No. Provide true, accurate, and current information. Wait until the use is approved and is available to customers before advertising it to them.

Brand Guidelines

It is important that Stepan employees comply with the Company's brand guidelines to ensure brand strength and avoid infringement on any other company's marks. If in doubt, forward any requests to the Global Marketing Communications Department.



Media Relations

We value consistent and accurate information about our Company because it helps protect our brand and reputation.

Keep in mind that everything we communicate about our Company has an impact on our reputation, coworkers, and brands. To ensure that information about our Company is consistent and accurate, do not speak on behalf of Stepan unless you are authorized to do so. Instead, forward inquiries to the General Counsel or the Chief Financial Officer.

Communicating Responsibly

Do your part to promote our media relations policies by:

- Referring all media requests for information to the General Counsel or the Chief Financial Officer;
- Seeking approval from the appropriate Stepan resource before accepting any speaking engagements or offers to publish an article on behalf of Stepan; and

If in doubt, forward any requests to the Legal Department.

How We Perform

We communicate responsibly and with one voice.

Making Ethical Decisions

Q. I recently saw an article in the newspaper with information about Stepan that I know is incorrect. Would it be appropriate for me to contact the author of the article and provide the correct information?

A. No, but please share this information promptly with the General Counsel and/or Chief Compliance and Risk Officer to help ensure that a clear and accurate message is communicated.



Social Media

We value social media because, when used correctly, it provides an effective way to exchange ideas and stay informed.

When using social media for business purposes (or in ways that may impact Stepan) you must comply with this Code and any relevant policies. In addition, take care that in personal posts you do not indicate that your opinions are those of Stepan's. Use social media in a way that is consistent with our Values, policies, and the law.

Also, be aware that you are responsible for everything you publish. Always use good judgment and be honest and ethical in the way you communicate.

Lastly, know that we have zero tolerance for cyberbullying and the use of social media to intimidate, harass, or discriminate against fellow employees and others.

Communicating Responsibly

When posting online, remember:

- Respect copyright. Never post content – articles, posters, images, videos, brochures – that is not yours without citation or without first obtaining permission.
- Never disclose confidential business information – meaning anything that is financial, operational, or legal in nature, or any other information that pertains to our customers or suppliers.
- Never use ethnic slurs, personal insults, obscenity, or anything else considered unacceptable in our workplace.
- Do not create new Company social media accounts, e.g., a Stepan Agricultural Solutions YouTube channel, Stepan Mexico Facebook page, or Stepan Personal Care Twitter feed, without approval from the Global Marketing Communications Director.
- Only persons specifically authorized may speak on Stepan's behalf.

Take note that nothing in our Code or our policies is intended or should be construed to interfere with or limit any of your legal rights, including those provided for under the National Labor Relations Act. As a Stepan employee, you have a right to speak up about matters related to the terms and conditions of employment.

How We Perform

We believe that social media offers a great way to build relationships, exchange ideas and promote honest and authentic online communications.

Making Ethical Decisions

Q. Would it be OK if I add that I work at Stepan on my Facebook page?

A. Yes. Under the law, you may share where you work as long as you follow our policies and make it clear that your opinions are your own.

Learn More

Social Media Policy

Import, Export, and Trade Compliance

We value trade compliance because it protects our operations and the integrity of the global marketplace while helping ensure our continued success.

Comply with all applicable trade control laws, regulations, boycott laws, and trade sanctions in the countries where we do business.

When the laws of more than one country may apply in cross-border transactions, conduct due diligence, or ask for guidance from the Director of Global Trade Compliance to determine the right path to take.

Accurately describe, classify, and document the value of goods and the country of origin for every import and export, and never conduct any business that will breach trade sanctions. If an economic sanction has been imposed, it may impact our operations. Seek approval before conducting business involving sanctioned countries, entities, or individuals.

Complying with Trade Laws

What this means for you:

- Comply with applicable export and import laws and regulations when transferring goods, services, software, or technology within your country or across national boundaries.
- Comply with national and international sanctions and embargoes and Stepan's destination-specific policies when doing business with entities in other countries.
- If you are involved in the transfer of goods, services, software, or technology (including items carried in hand baggage), make sure you understand the laws and regulations that apply, including those of other countries affected by the transfer. If you have any doubts, ask the Trade Compliance team to help you.
- Be alert for suspicious inquiries from individuals, organizations, or third parties acting on behalf of other organizations attempting to gain access to our goods, services, software, or technology.
- Ensure that all duties, levies, and tax obligations are satisfied, that the terms and conditions of any import or export authorizations are complied with, and that any necessary import or export declarations are made including those to the Customs Authority at the point of exit and/or entry.

How We Perform

We export and import products around the world, recognizing that our ability to conduct business internationally is a privilege, not a right.

Product Quality and Safety

We value safe, quality products because they keep our customers protected and establish trust and respect for our brand.

Follow all safety and quality control standards and monitor product quality to ensure they function as they were designed.

Always work efficiently but never sacrifice quality or safety to meet a company target or deadline.

Promptly report any safety, quality, or performance issues to your supervisor or someone in Corporate Quality, Legal Department or the Ethics & Compliance Department.

Promoting Product Quality and Safety

We have established product requirements that comply with all applicable standards, rules, laws, regulations, and customer requirements. Each of us is responsible for meeting these requirements. Keep the following in mind:

- Know and comply with any product safety requirements associated with your work. Stay alert for new regulations and attain all certifications, as necessary.
- Ensure that all selected vendors meet or exceed our safety and product testing requirements.
- Whether it is completing a training, monitoring safety inside a factory, or just asking the right questions, do whatever is possible in your role to promote product safety.
- Identify and look for opportunities to reduce risk during each product's life cycle.

How We Perform

We manufacture, distribute, import, and sell our products with our customers in mind, and are dedicated to always making their safety our priority.

Making Ethical Decisions

Q. I think there may be an issue with one of the manufacturing processes at my facility, but we are behind schedule. If I say anything, we will be delayed further. What should I do?

A. We never sacrifice quality or safety to meet a deadline or target. All issues or deviations relating to manufacturing processes need to be investigated and evaluated. You should report the matter immediately to your supervisor or someone in the Legal Department or the Ethics & Compliance Department.

Learn More
Stepan Quality Policy

Closing Thoughts



Stepan demands high levels of performance from its employees and businesses, but Stepan also demands that we never cut corners on our commitment to the highest standards of ethical business conduct and 100% compliance with applicable laws. Everyone at Stepan has a role in ensuring that we act with integrity in everything we do. Your talent, support, and commitment to doing the right thing, regardless of whether anyone is looking or whether someone will acknowledge you for it, are vital to our success.

Our Code is here to help you understand your obligations in representing Stepan. If you feel something is not right, speak up. When you do, you help us demonstrate Stepan's Values and the leadership needed to continue creating innovative chemical solutions for a cleaner, healthier, more energy-efficient world.

Reading the Code was just the first step in your commitment to doing the right thing. Applying it is next. Look to your supervisor for additional guidance but always know you can reach out to me with any question or concern.

Thank you for all that you do every day to deliver high performance with integrity.

David Mattingly
Vice President, Chief Compliance and Risk Officer
Stepan Company



Resource:	For:	Contact:
Ethics & Compliance Department	Any questions about the Code of Conduct or its application	DMattingly@stepan.com
Legal Department	Questions or reporting concerns	Shawn.Lisle@stepan.com
Human Resources Departments	Questions or reporting concerns	Andrea.Barry@stepan.com
EthicsPoint	Help with reporting incidents or concerns	https://stepanethicshotline.tnwreports.com

Policy Name	Code of Conduct
Policy Version	1.7
Policy Sponsor	VP, Chief Compliance and Risk Officer
Applicability	Global
Effective Date	10.01.2026
Original Effective Date	12.01.2019