



## **Policy on Political Involvement and Contributions**

(Status: October 2021)

### **Political Involvement**

Orion Engineered Carbons generally welcomes and encourages political and civic involvement on the part of its employees as individual citizens. The Company also respects the freedom of its employees to make their own political decisions as private citizens. In this regard, the employees' decisions are entirely personal and voluntary.

The employees must always make clear that their views and actions are their own, and not those of the Company. Employees must not use their position with the Company to coerce or pressure other employees to make contributions to, or support or oppose, any political candidates, elections, ballot initiatives or causes.

Employees may not be asked, in the business context, either directly or indirectly, to provide money for political party contributions or to support a political party or a person running for a political office. The Company's employees should report any political office they hold to the Company's chief compliance officer.

### **Political Contributions**

As a general matter, the Company does not directly make contributions, donations, gifts or loans to or for the benefit of political parties or committees, candidates for public office or political organizations. In addition, generally speaking, the Company does not engage in direct lobbying activities. The Company is a member of various trade associations that may engage in political activities including candidate contributions and lobbying.

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