



We're going further

CODE OF BUSINESS CONDUCT



April 2023

COP 150.05C - ACTIVE

TABLE OF CONTENTS

Message from the Chairman of the Board

Pilot Chemical's Vision

Pilot Chemical's Mission

A. About the Code of Business Conduct and Ethics

1. Reporting Concerns -- Where to Go for Help
2. Internal Investigations and Our Commitment to Non-Retaliation

B. People

1. Manager Responsibilities
2. Human Rights
3. Diversity, Respect and Equal Opportunity
4. Compensation
5. Labor Practices
6. Health and Safety in the Workplace
7. Violence in the Workplace
8. Substance Abuse in the Workplace
9. Privacy

C. Business

1. Communicating with External Parties
2. Honest Advertising and Marketing
3. Proper Use of Electronic Media
4. Company Records and Internal Controls
5. Customer and Third-Party Information
6. Confidentiality and Trade Secrets
7. Bribery and Corruption
8. Conflicts of Interest
9. Gifts, Favors and Entertainment
10. Insider Trading
11. Antitrust Compliance
12. Fair Procurement
13. Physical Assets and Resources
14. Money Laundering
15. Import and Export
16. Waivers

D. Citizenship

1. Lobbying
2. Philanthropy
3. Social Media
4. Environmental Responsibility

E. Q&A





Chairman's Message

At Pilot Chemical Company, we as a team have worked very hard to build a successful and well-respected company. We simply cannot - and will not - tolerate unethical or inappropriate behavior. Our Code of Business Conduct and Ethics serves as our guide to conducting business with the highest integrity and the highest ethical standards. It supports Pilot's values and full compliance with applicable laws. We all have a personal responsibility to uphold and ensure the letter and spirit of our Code of Business Conduct and Ethics in our individual roles, every single day.

In the global markets where Pilot competes, we sometimes encounter situations that test our judgment and integrity. When those situations arise, this Code should be used as a resource to help you answer these questions:

- Is it legal and in keeping with Pilot's policies?
- Does this action appear appropriate?
- If this were made public, would I be comfortable?

I ask you to read, understand, and most importantly, to conduct your actions in keeping with this Code. Never hesitate to seek help if you are faced with a legal, compliance or ethical issue.

Each of us is accountable to do the right thing.

Sincerely,

A handwritten signature in cursive script that reads "Paul Morrisroe".

Paul Morrisroe
Chairman
Pilot Chemical Company

Pilot Chemical's Vision

Pilot Chemical strives to be the most respected global source for performance chemical solutions.

Pilot Chemical's Mission

Pilot Chemical is a private company that uses innovative processes to manufacture the highest quality performance chemical solutions to help its customers grow profitably.



A. About the Code of Business Conduct and Ethics

At Pilot Chemical Corp. ("Pilot Chemical") we are committed to maintaining the highest standards of business conduct and ethics. Our Code of Business Conduct and Ethics (the "Code") reflects the business practices and principles of behavior that support this commitment. We expect every employee, officer and director of Pilot, its divisions and subsidiaries (the "Company") to read and understand our Code and its application to your business responsibilities. References in the Code to employees are intended to cover employees, officers and, as applicable, directors.

Many of the principles described in this Code are general in nature, and do not cover every situation that may arise. It is not a comprehensive rulebook, but rather a statement of how we commit to do business. It should be used as a guide in addition to other Pilot Chemical policies and guidelines. You are expected to comply with both the letter and the spirit of our Code. This means you must understand and comply with all policies, laws and regulations that apply to your job.

You should not hesitate to ask questions about whether any conduct may violate the Code, voice concerns, or clarify gray areas. In addition, you should be alert to possible violations of the Code by others and report suspected violations, without fear of any form of retaliation.

Violations of the Code will not be tolerated. Any employee who violates the standards in the Code may be subject to disciplinary action, which, depending on the nature of the violation and the history of the employee, may range from a warning or reprimand up to and including termination of employment and, in appropriate cases, civil legal action or referral for regulatory or criminal prosecution.

1. Reporting Concerns -- Where to Go for Help

If you have questions, concerns, or need to report a known or suspected violation, you should discuss it with your manager, General Counsel, or a Human Resources representative.

Pilot Chemical aims to conduct business with the highest standards of ethics, honesty and integrity, and recognizes that you have an important role to play in maintaining this aim. Any employee or worker providing services to the Company concerned about any form of malpractice, improper action, or wrongdoing by our Company, its employees or other stakeholders is strongly encouraged to report the matter. Pilot Chemical believes that any employee with knowledge of wrongdoing should not remain silent. We take all matters of malpractice, improper action or wrongdoing very seriously and you are strongly encouraged to raise incidents or behaviors that are not in accordance with this Code, or the policies to which it refers.

2. Internal Investigations and Our Commitment to Non-Retaliation

Once a report of a violation of this Code is made, Pilot Chemical will investigate it promptly and thoroughly. Pilot Chemical expects all employees to cooperate in investigations fully and candidly, and will take corrective action, as appropriate, based on the findings of the investigation.

Any employee who reports a violation will be treated with dignity and respect and will not be subjected to any form of discipline or retaliation for reporting in good faith. Retaliation against anyone who provides information or otherwise assists in an investigation or proceeding regarding any conduct that the employee believes in good faith may constitute a violation of applicable laws or regulations, our Code, or Pilot Chemical's related policies is prohibited and will, in itself, be treated as a violation of this Code.

B. People

1. Manager Responsibilities

All Company leaders must show a commitment to our values through their actions. They also must promote an environment where compliance is expected and ethical behavior is the norm. All Company employees must comply with Pilot Chemical's values and principles. No one should ask a Company employee to break the law, or go against Pilot Chemical's values, policies and procedures.



2. Human Rights

At Pilot Chemical, we conduct our operations consistent with the spirit and intent of the [United Nations Universal Declaration of Human Rights](#). Human rights are generally defined as basic standards of treatment to which all people are entitled, regardless of nationality, gender, race, economic status or religion. Although governments have the primary duty to protect and ensure fulfillment of human rights, Pilot Chemical recognizes that companies have a responsibility to respect human rights and can also play a positive role in the communities where they operate.

We call special attention to modern slavery which is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Pilot Chemical has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

[For more information see COP 100.50 Anti-Slavery Policy](#)

3. Diversity, Respect and Equal Opportunity

Pilot Chemical is committed to treating all employees fairly and with respect. We will provide equal opportunities to all employees and applicants. We strive to create an environment of mutual respect free from harassment and unprofessional behavior. We will not tolerate any form of harassment or unlawful discrimination against our employees by anyone, including managers, supervisors, other employees, vendors or others. Discrimination based on age, race, color, religion, national origin, gender, sexual orientation, physical or mental disability, and veteran status or other protected classes is prohibited. This applies to all terms and conditions of employment.

[For more information see Personnel Policy Manual \(PPM\) section 2.2 on Equal Employment Opportunity](#)

[For more information see PPM section 4.3 Policy on Prohibiting Harassment in Employment](#)

4. Compensation

Pilot Chemical is committed to complying fully with all applicable laws and regulations dealing with wage-and-hour issues, including meal and rest breaks, overtime pay, termination pay, minimum-wage requirements, wages and hours of minors, prohibition of off-the-clock work, and other subjects related to wage and hour practices.



5. Labor Practices

We recognize and respect all labor and employment laws – including those pertaining to freedom of association, privacy and equal employment opportunity – wherever we operate.

We do not use forced or involuntary labor.

We comply with all applicable child labor laws.

The Company does not guarantee employment in a specific job or for any particular period of time to any employee.

6. Health and Safety in the Workplace

Pilot Chemical is committed to providing a safe and healthy workplace for employees, customers and visitors to its premises. All employees have responsibility for ensuring proper safety and health conditions in our workplace. Management is committed to maintaining industry standards in all areas of employee safety and health, including industrial hygiene, ergonomics and safety. To support this commitment, employees are responsible for observing all safety and health rules, practices and laws that apply to their jobs, and for taking precautions necessary to protect themselves, their co-workers and visitors. Employees are also responsible for immediately reporting accidents, injuries, occupational illnesses and unsafe practices or conditions to their supervisor.



7. Violence in the Workplace

Threats, acts of violence and physical intimidation are strictly prohibited. The possession, transport, storage or use of any weapon while on the job or on Company premises is prohibited, except pursuant to any applicable law that limits such prohibition. No talk of violence or joking about violence will be tolerated. As is the case with any violation of the Code, employees have a responsibility to report any unsafe behavior or condition regardless of whether they are directly involved or a witness.

8. Substance Abuse in the Workplace

Pilot Chemical requires employees to work free from the influence of any substance that may prevent them from conducting work activities safely and effectively.

[For more information see PPM section 4.5 on Drug and Alcohol Abuse](#)

9. Privacy

We respect the privacy of our employees and will protect personal and confidential information that we are required to obtain for operating or legal purposes. Access to personal

employee information, such as personnel information and medical records, is strictly limited by Pilot Chemical policy and government privacy laws and regulations. While we respect employees' privacy, we reserve the right to inspect our facilities and property, such as computers, telephone records, lockers, e-mails, files, business documents and workplaces. Employees should not expect privacy when using Company-provided services, systems, or equipment.

[For more information see PPM section 4.11 on Property Inspection](#)

[For more information see PPM section 4.18 on Use of Communication Equipment and Information Systems](#)

C. Business

1. Communicating with External Parties

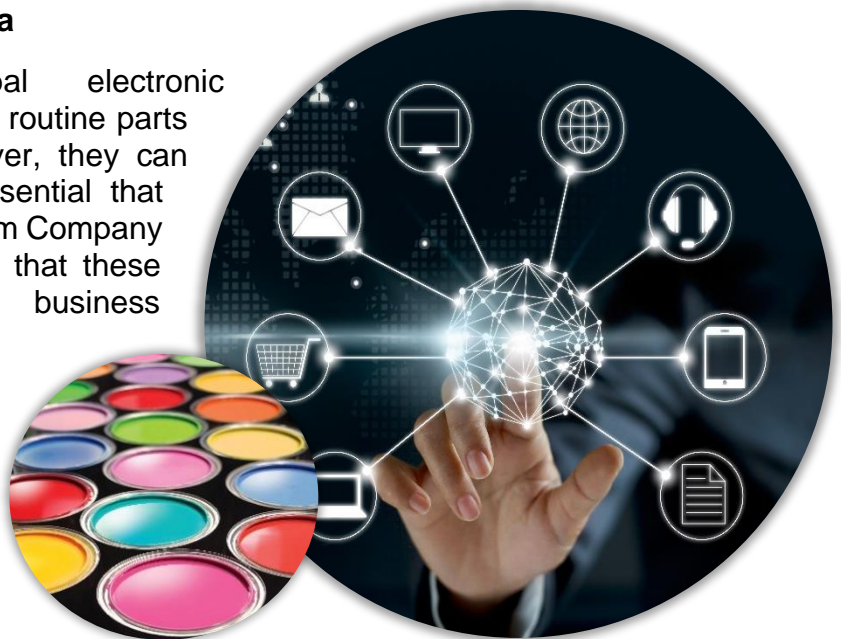
Company employees are not authorized to speak with the media or analysts on behalf of Pilot Chemical unless expressly authorized by Pilot Chemical management. Unless authorized, do not give the impression that you are speaking on behalf of Pilot Chemical in any communication that may become public. This includes posts to online forums, social media sites, blogs, chat rooms, and bulletin boards. This policy also applies to comments to journalists about specific matters that relate to our businesses, as well as letters to the editor and endorsements of products or services.

2. Honest Advertising and Marketing

It is our responsibility to accurately represent Pilot Chemical and our products in our marketing, advertising and sales materials. Deliberately misleading messages, omissions of important facts or false claims about our products, individuals, competitors or their products, services, or employees are inconsistent with our values. Sometimes it is necessary to make comparisons between our products and our competitors. When we do we will make factual and accurate statements that can be easily verified or reasonably relied upon.

3. Proper Use of Electronic Media

The Company uses global electronic communications and resources as routine parts of our business activities. However, they can present risks. Therefore, it is essential that electronic resources used to perform Company business are protected to ensure that these resources are accessible for business purposes and operated in a cost-effective manner, that our Company's reputation is protected, and that we minimize the potential for legal risk.



4. Company Records and Internal Controls

Accurate and reliable records are crucial to the Company's business. We are committed to maintaining accurate Company records and accounts in order to ensure legal and ethical business practices and to prevent fraudulent activities. We are responsible for helping ensure that the information we record, process, and analyze is accurate, and recorded in accordance with applicable legal or accounting principles. We also need to ensure that it is made secure and readily available to those with a need to know the information on a timely basis.

Company records include, but are not limited to, booking information, payroll, timecards, travel and expense reports, e-mails, accounting and financial data, measurement and performance records, government reporting, electronic data files, and all other records maintained in the ordinary course of our business. All Company records must be complete, accurate, and reliable in all material respects. There is never a reason to make false or misleading entries. We rely on you to come forward if you feel that you are being pressured to prepare, alter, conceal or destroy documents in violation of Pilot Chemical's policy. In addition, you must report it to the Company if you have any reason to believe that someone affiliated with Pilot Chemical has made a misleading, incomplete, or false statement to an accountant, auditor, attorney or government official in connection with any investigation, audit, examination or filing with any government agency or regulatory body.

Audits performed by internal and external auditors help ensure compliance with policies, procedures, controls and regulations. All of us are required to cooperate fully with internal and external auditors by providing clear and truthful information and cooperating fully during the audit process.

[For more information see CWI 100.21 Retention Schedule](#)

[For more information see CWI 100.03 Controlled Documented Information](#)

5. Customer and Third-Party Information

Keeping customer information secure and using it appropriately is a top priority for our Company. We must safeguard any confidential information customers or third parties share with us. We must also ensure that such information is used only for the reasons for which the information was gathered, unless further use is allowed by law. Customer or third-party information includes any information about a specific customer/third party, including such things as name, address, phone numbers, financial information, etc. We do not disclose any information about a third party without their written approval unless legally required to do so.



6. Confidentiality and Trade Secrets

In carrying out Company business, employees often learn confidential or proprietary information about our Company, its customers, prospective customers, or other third parties. Employees must maintain the confidentiality of all information entrusted to them, except when disclosure is authorized or legally mandated, and they must fully comply with applicable agreements, such as nondisclosure agreements.

[For more information see CWI 103.12 Maintenance of Confidential Information](#)

[For more information see CWI 250.32 Trade Secret Policy](#)

7. Bribery and Corruption

The United States and many other countries have laws that prohibit bribery, kickbacks, and other improper payments. No Company employee, officer, agent, or independent contractor acting on our behalf may offer or provide bribes or other improper benefits in order to obtain business or an unfair advantage. A bribe is defined as directly or indirectly offering anything of value (e.g., gifts, money, or promises) to influence or induce action, or to secure an improper advantage. The Foreign Corrupt Practices Act and other U.S. laws prohibit payment of any money or anything of value to a foreign official, foreign political party (or official thereof), or any candidate for foreign political office for the purposes of obtaining, retaining or directing of business. We require all employees, officers, agents, and independent contractors acting on behalf of the Company to strictly abide by these laws.

[Pilot Chemical Company Anti-Corruption Laws Policy Guide](#)

8. Conflicts of Interest

All employees have an obligation to make sound business decisions in the best interests of the Company without the influence of personal interests or gain. Pilot Chemical requires you to avoid any conflict, or even the appearance of a conflict, between your personal interests and the interests of our Company. A conflict exists when your interests, duties, obligations or activities, or those of a family member, are, or may be, in conflict or incompatible with the interests of the Company. Conflicts of interest expose our personal judgment and that of our Company to increased scrutiny and criticism and can undermine our credibility and the trust that others place in us. Should any business or personal conflict of interest arise, or even appear to arise, you should disclose it immediately to General Counsel for review. In some instances, disclosure may not be sufficient and we may require that the conduct be stopped or that actions taken be reversed where possible.



As it is impossible to describe every potential conflict, we rely on you to exercise sound judgment, to seek advice when appropriate, and to adhere to the highest standards of integrity. Examples of conflicts of interest include:

- Owning, directly or indirectly, a significant financial interest in any entity that does business, seeks to do business, or competes with our Company.
- Holding a second job that interferes with your ability to do your regular job at the Company.
- Employing, consulting, or serving on the board of a competitor, customer, supplier, or other service provider.
- Hiring a supplier, distributor, or other agent managed or owned by a relative or close friend.
- Soliciting or accepting any cash, gifts, entertainment, or benefits that are more than modest in value from any competitor, supplier, or customer.
- Taking personal advantage of corporate opportunities.

9. Gifts, Favors and Entertainment

Modest gifts, favors, and entertainment are often used to strengthen business relationships. However, no gift, favor or entertainment should be accepted or given if it obligates, or appears to obligate, the recipient, or if it might be perceived as an attempt to influence fair judgment.

Our employees, officers, directors, agents or family members of any of the same are prohibited to offer, accept, or receive a gift or entertainment if it:

- Is in cash;
- Is not consistent with customary business practices;
- Is extravagant in value;
- Can be construed as a kickback, bribe or payoff in violation of any law, including a bribe to a government official in violation of the U.S. Foreign Corrupt Practices Act;
- Violates any other laws or regulations; or
- Could cause embarrassment to or discredit our Company if disclosed.

In general, unless you have supervisory approval, you should not provide any gift or entertainment to customers, suppliers, or others that you would not be able to accept from a customer, supplier, or other applicable parties.

10. Insider Trading

Employees are prohibited from trading or enabling others to trade stock of another company – such as a customer, supplier, competitor, potential acquisition or alliance – while in possession of material nonpublic information (“inside information”) about that company. Material information is any information that an investor might consider important in deciding whether to buy, sell, or hold securities. Information is considered non-public if it has not been



adequately disclosed to the public. Information is not considered public until the first business day after it has been disclosed to the public. All non-public information about companies with which we do business is considered confidential information. To use material non-public information in connection with buying or selling securities, including “tipping” others who might make an investment decision on the basis of this information, is not only unethical, it is illegal. Violations of insider trading laws can result in severe fines and criminal penalties, in addition to disciplinary action by Pilot Chemical. We must exercise the utmost care when handling material inside information.

11. Antitrust Compliance

It is our policy that all employees comply with antitrust and competition laws. International and U.S. federal and state antitrust and competition laws prohibit efforts and actions to restrain or limit competition between companies that otherwise would be competing for business in the marketplace. You must be particularly careful when you interact with any employees or representatives of the Company’s competitors. You should use extreme care to avoid any improper discussions with our competitors, especially at trade association meetings or other industry or trade events where competitors may interact. Under no circumstances should you discuss the following with any employees or representatives of our competitors:

- Prices or pricing strategy,
- Discounts,
- Terms of our customer relationships,
- Sales policies,
- Marketing plans,
- Customer selection,
- Allocating or “dividing up” customers or market areas, or
- Contract terms and contracting strategies.

Agreements with competitors do not need to be written in order to violate applicable antitrust and competition laws. Informal, verbal, or implicit understandings, e.g., knowing winks, are also violations.

Antitrust violations in the U.S. may be prosecuted criminally as felonies and can result in severe penalties for the Company and any associate or other person who participates in a violation.

[For more information see CFF 100.05.02 Antitrust Compliance Policy](#)

12. Fair Procurement

We engage in open and fair procurement activities regardless of nationality or the size of the transaction. Suppliers are selected on a competitive basis based on total value, which includes quality, suitability, performance, service, technology, and price. We work to establish mutually beneficial relationships with our suppliers based on close cooperation and open communication. Terms and conditions defining our relationship with suppliers are



communicated early in the supplier selection process. Any agreements to such terms and conditions, or any acceptable modifications, are reached before work begins. U.S. federal law requires that certain government procurement rules related to ethics and business conduct apply to subcontractors even if the subcontractors themselves do not have government contracts. You are expected to know and comply with all government procurement rules applicable to our business.

[For more information see CWI 100.04 Approval of Suppliers](#)

13. Physical Assets and Resources

All employees must protect Company assets, such as equipment, inventory, supplies, cash, and information. Treat Company assets with the same care you would if they were your own. Use our Company resources only to conduct Company business. No employee may commit theft, fraud or embezzlement, or misuse Company property.

14. Money Laundering

Money laundering is a global problem with far-reaching and serious consequences. Money laundering is defined as the process of converting illegal proceeds so that funds are made to appear legitimate, and it is not limited to cash transactions. Complex commercial transactions may hide financing for criminal activity such as terrorism, illegal narcotics trade, bribery, and fraud. Involvement in such activities undermines our integrity, damages our reputation and can expose the Company and individuals to severe sanctions. Pilot Chemical forbids knowingly engaging in transactions that facilitate money laundering or result in unlawful diversion. We take affirmative steps to detect and prevent unacceptable or illegal forms of payment and financial transactions.



Anti-money laundering laws of the United States and other countries and international organizations require transparency of payments and the identity of all parties to transactions. We are committed to full compliance with anti-money laundering laws throughout the world and will conduct business only with reputable customers involved in legitimate business activities and transactions.

15. Import and Export

We comply with all United States federal import and export laws and regulations. These laws restrict transfers, exports, and sales of products or technical data from the United States to certain prescribed countries and persons as well as re-export of certain such items from one non-U.S. location to another. Many countries in which we operate have similar laws and regulations.

The Company does not cooperate with foreign boycotts that are not approved by the U.S. government. If you receive a request related to any boycott, contact General Counsel and do not respond to the request.

16. Waivers

Pilot Chemical's Board of Directors will waive application of the policies set forth in this Code only where circumstances warrant granting a waiver based on the best interests of Pilot Chemical and its shareholder(s) and applicable laws allow waiver. Any waiver pertaining to an employee must be approved by Pilot Chemical's President. Waivers of the Code for directors and executive officers may be made only by those members of Pilot Chemical's Board of Directors not involved in the possible waiver and must be promptly disclosed as required by law or regulation.



D. Citizenship

The Company is a vital part of the communities that host our facilities. We pride ourselves on being a responsible company; one that operates with integrity, makes good choices, and does the right thing in every aspect of our business. We continually challenge ourselves to define what being a responsible company means to us and continue to align our social and environmental efforts with our business goals.

1. Lobbying

Pilot Chemical encourages all employees to vote and be active members in political processes. Our rules in this area are:

- Company funds may not be donated to any political party, candidate, or campaign.
- Company property or work time may not be used to assist any political party, candidate, or campaign.
- Employees may not be reimbursed for personal political activity.

Although United States election laws allow companies to create and support political action committees, our Company does not sponsor such committees. It is acceptable for Pilot Chemical to express its view to governments on subjects that might affect the welfare of the Company. Communicating Pilot Chemical's position on issues or matters of policy to government employees and officials can make employees and our Company subject to applicable lobbying laws, and we must comply with those laws. Pilot Chemical also may elect to contribute funds to support or help defeat public initiatives that might substantially

affect our business. Pilot Chemical's President and General Counsel must approve all participation or uses of funds for these purposes.

2. Philanthropy

At times Pilot Chemical supports different charitable organizations and philanthropic endeavors. Employees are encouraged to also support these efforts or causes of their own choice. However, as with political activities, employees may not use Company resources to personally support organizations or endeavors not specifically sanctioned or supported by Pilot Chemical. Employees may not claim to represent Pilot Chemical to the public or in any public process or forum, unless specifically requested to do so by Pilot Chemical management.

[For more information see Charitable Giving Memorandum](#)

3. Social Media

Social media is of growing importance in business. It enables us to learn from and share information with our stakeholders, as well as communicate with the public about our Company. Employees should keep in mind that social media transmissions are permanent and easily transferable and can affect our Company's reputation and relationships with coworkers, customers and others. When using social media tools like blogs, Facebook, Twitter, etc., employees must clearly distinguish between authorized business communication and personal communication. Employees may not make comments on behalf of Pilot Chemical without proper authorization.



In addition to following all Company policies, employees may not disclose our Company's confidential or proprietary information.

4. Environmental Responsibility

We are committed to conducting business in an environmentally responsible manner and strive to improve our performance to benefit our employees, customers, communities, shareholders, and the environment. We use energy wisely and efficiently and employ technology to minimize risk of environmental impact. Employees whose work affects environmental compliance must be completely familiar with the permits, laws, and regulations that apply to their work. All employees are responsible for making sure that Company business is conducted in compliance with all applicable laws and regulations and in a way that is protective of the environment.

Q&A

Question: Suppose my boss asks me to do something that I think is wrong. What should I do?

Answer: The Company relies on you to use your best ethical judgment. Therefore, do not do anything that you believe may be wrong. A first course of action may be to express your concerns directly to your supervisor. If you feel your supervisor has not adequately addressed your concerns or if you are uncomfortable raising the issue with your supervisor, you can take further steps to resolve this issue by speaking to others listed in “Reporting Concerns -- Where to Go for Help,” or informally and confidentially with the General Counsel. The important thing is to not take any action that you know or believe to be against the Code.

Question: The different laws are so complicated and cover so many different areas, how can I be sure that I won’t violate some little technicality? How am I supposed to understand it all? I’m not a lawyer.

Answer: Don’t abandon your own judgment. If something seems intuitively wrong to you, ask before acting. You also have an obligation to understand the finer points of the rules governing your job. Do not hesitate to contact the General Counsel if you need clarification of the laws or of our standards and policies.

Question: What happens if I am faced with a situation where acting ethically conflicts with making a profit for the Company?

Answer: You must always engage in legal and ethical conduct, no matter what the circumstances. The Company’s long-term profitability depends on our reputation. If you feel that there is a conflict between what is “right” and what is profitable, you should contact your manager, General Counsel, or Human Resources for guidance.



Question: How do I know if my conduct is ethical? Are there specific rules?

Answer: It's not possible to anticipate every scenario that will arise in the course of our business, however as a guideline, you should consider the following questions. Unless the answer to each question is "yes," the action should not be taken:

- Is this action legal, ethical, and socially responsible?
- Does this action comply with both the spirit and the letter of our Code of Business Conduct and Ethics?
- Will this action appear appropriate?
- Is it clear that our Company would not be embarrassed or compromised if this action were to become known within our Company or publicly?

Question: During a dinner break at an industry conference, someone who works for one of our competitors mentioned that his company was considering increasing prices because of certain industry pressures. Everyone knows that our Company is also experiencing these same pressures. Is it okay for me to discuss our pricing plans?

Answer: No. You may never discuss pricing with a competitor. This prohibition applies equally to learning the competitor's pricing practices or plans (other than from publicly available information) and to revealing those of the Company. As soon as you realize that a competitor is starting to raise this subject, you should break off the discussion, even if it means walking out in the middle of a meal. You should then immediately report what happened to Pilot Chemical's General Counsel.

Question: An employee from one of our competitors has applied for a job at our Company. Is it ok for me to ask how her company conducts certain aspects of its business?

Answer: No. You should focus on interviewing the person for the position, not on gathering competitor information.

