



Rinchem RBA Human Rights Reporting

September 2018

Rinchem's Code of Conduct

- **Every year and with every new employee, Rinchem recommits itself to full implementation of our FCPA and anti-bribery code of conduct.**
- This code acts as a guide for Rinchem employees, customers, suppliers and partners.

Required FCPA Training

- **Anti-Bribery/Anti-Corruption:** Rinchem employees have an obligation to comply with the U.S. Foreign Corrupt Practices Act (FCPA), as well as all other country-specific anti-bribery and anti-corruption laws.
- Employees may not give, promise, or offer anything of value, to any customer, government employee, or other person for the purpose of improperly influencing a decision, securing an advantage, avoiding a disadvantage, or obtaining or retaining business.
- Each employee is required to take the FCPA and anti-bribery training provided by the Company and to certify compliance with the principles outlined in the training and the Code annually.

FCPA: Code of Conduct Training

New and Existing Annual Management Training Compliance

