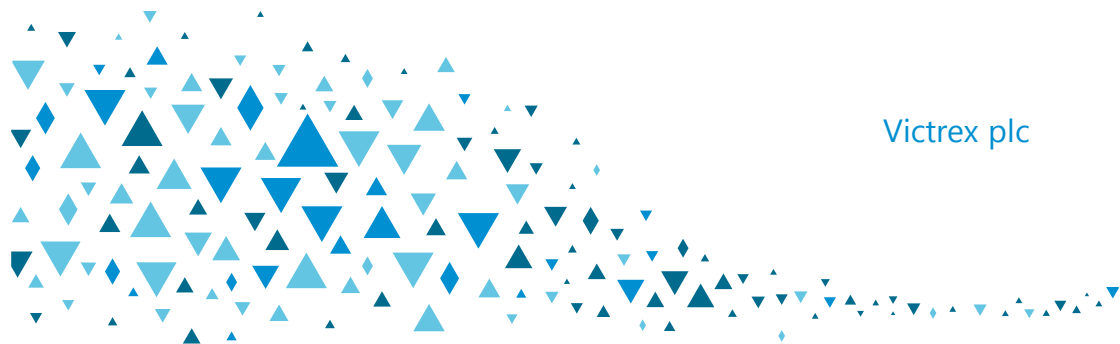


VICTREX CODE OF CONDUCT

DOING THE RIGHT THING

Victrex plc



INTRODUCTION FROM OUR CEO

Passion, Innovation and Performance are integral to our behaviours and we must support and uphold them in an ethical manner.

Our ethical principles are set in our Code of Conduct and underpin the way we do business and treat one another.

Our Code sets the foundations of how we act personally, with others and in our communities.

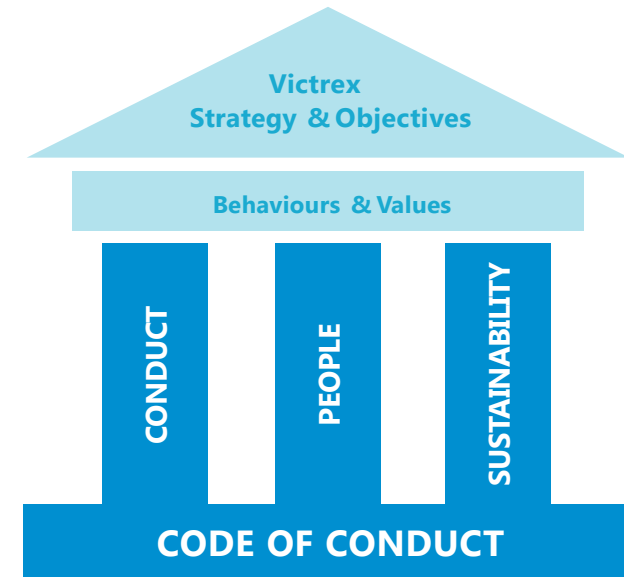
Our continued success as a business rests on maintaining these principles and ensuring we strive to always:

DO THE RIGHT THING.

Jakob Sigurdsson
CEO, Victrex plc



CODE OF CONDUCT FRAMEWORK



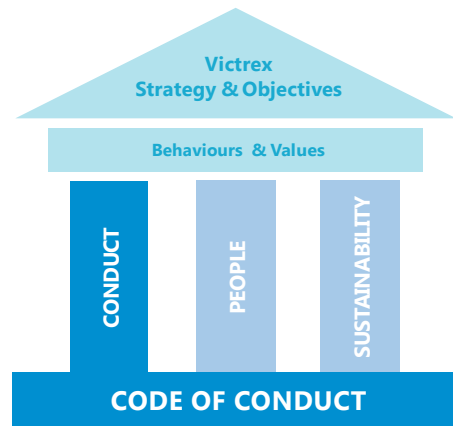
Our Code of Conduct gives us the ethical foundation for everything we do.

It's supported by the expectations set in our Code of Conduct suite of supporting policies, on Conduct, People and Sustainability.

Our Behaviours and Values span these, demonstrating how we use these to deliver our Strategy and Objectives.

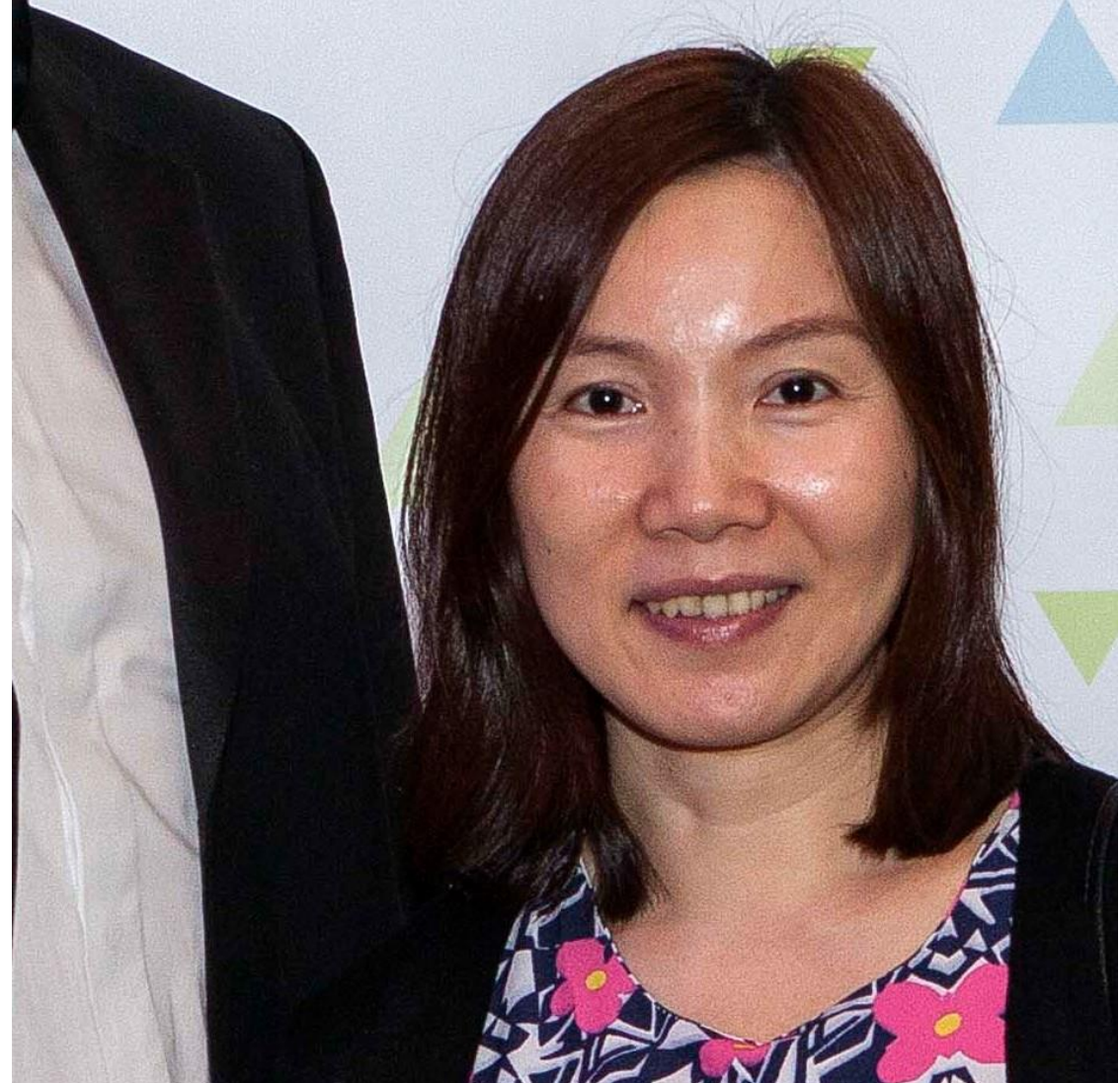
DOING THE RIGHT THING in our **CONDUCT**

- We are open and honest
- We comply with all applicable laws and regulations
- We do not engage in anti-competitive activity, bribery or corruption
- We protect our company information and confidential information shared with us
- We follow good standards of corporate governance and do not abuse market regulations



Our Conduct policies include

- Fraud Policy
- Conflict of Interests Policy
- Modern Slavery & Human Trafficking Policy
- Conflict Minerals Policy
- Export & Sanctions Policy
- Anti-Bribery & Corruption and Financial Crime Policy
- Competition and Anti-Trust Policy
- Data Protection Policy
- Information Security Policy
- Share Dealing Codes



Ivy Wong

Customer Services, Hong Kong

CEO Award winner 2016 for

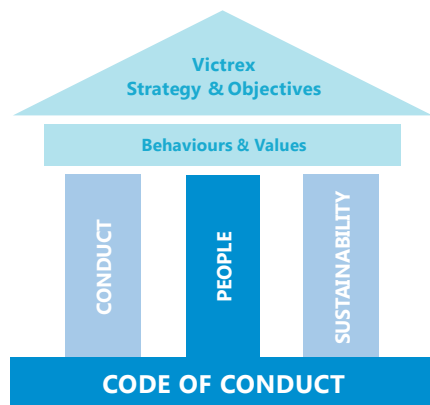
Demonstrating our Values



DOING THE RIGHT THING

DOING THE RIGHT THING for our **PEOPLE**

- We treat people with fairness and respect, and hold ourselves and each other to account
- We do not discriminate
- We provide a safe and healthy workplace and ensure our activities do not harm our employees, the public or the environment



Our People policies include

- Global Whistleblowing Policy
- Disciplinary & Grievance Policies
- Diversity & Equal Opportunities Policy
- SHE Policy



Matt Owen

Operations, Hillhouse

CEO Award winner 2016 for

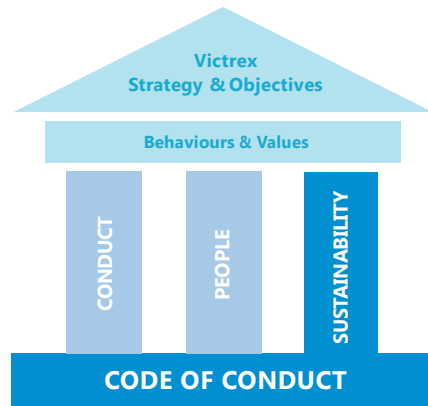
Demonstrating our Values



DOING THE RIGHT THING

DOING THE RIGHT THING for **SUSTAINABILITY**

- We deliver sustainable polymer solutions
- We work to minimise the environmental impact of our business operations
- We contribute to the wellbeing of our local communities
- We seek to inspire the next generation



Our Sustainability policies include

- Sustainability Policy



Irene Sinz

Sales, Europe

CEO Award winner 2016 for
Giving Something Back



DOING THE RIGHT THING

Find out more

All of our employees, officers and Board members must be aware of and follow our Code of Conduct and its supporting policies. Any breaches of the Code may result in disciplinary action. There is annual re-certification through mandatory awareness training.

Our employees can read the full Code of Conduct policies on the Code of Conduct section on the V-NET Policies page, and are encouraged to discuss with their line managers if they are unsure how these relate to their role.

External parties can see more information on

www.victrexplc.com

Speak up

If you have concerns that this Code of Conduct or its supporting policies are not being followed, **DO THE RIGHT THING** and let us know.

The Global Whistleblowing Policy gives you more help on how to do this.

There is no right way to do the wrong thing



DOING THE RIGHT THING

Victrex Code of Conduct – Victrex© 2017