

AMCOL INTERNATIONAL CORPORATION

SUPPLIER CODE OF BUSINESS CONDUCT

AMCOL is committed to high standards of corporate governance and responsibility. Our policy is to maintain a culture of compliance in our worldwide supply base. In consequence, AMCOL expects that all Suppliers will adhere to this Supplier Code of Business Conduct and its commitment to integrity.

To do business with AMCOL, suppliers shall ensure that all its representatives including its employees, agents, suppliers, subsidiaries and subcontractors, collectively referred to as “the Supplier”, conduct business with AMCOL in accordance with this Supplier Code of Conduct.

Follow the Law

A. Compliance with the Law and Regulations

The Supplier has an unqualified responsibility to comply with all applicable laws and regulations including the specific areas highlighted in this code.

B. Anti-bribery - Kickbacks, Bribes and Payoffs

Suppliers will conduct business without engaging in corrupt practices, including public or private bribery or kickbacks. Suppliers will maintain integrity, transparency and accuracy in corporate record-keeping. Suppliers and its agents shall at all times comply with the Anti-Corruption Policy of AMCOL, a copy of which may be obtained from AMCOL Purchasing at 2870 Forbs Avenue, Hoffman Estates, Illinois, 60192.

C. Fair Competition

AMCOL believes in vigorous yet fair competition and supports the anti-trust, marketing and competition laws. The Supplier shall not violate these laws.

D. Insider Trading

The Supplier shall ensure that any confidential information in its possession regarding AMCOL is not used to either engage in or support insider trading.

Employment Practices

The Supplier shall respect the [UN Universal Declaration of Human Rights and ILO Conventions] and comply with national [human rights] and employment legislation. At a minimum, the Supplier shall uphold the following standards in its own organization and its supply chain:

- Provide a safe working environment for staff and subcontractors
- Prohibit use of slaves, forced or bonded labor and child labor
- Validate that all employees and the employees of subcontractors have the legal right to work in the country where services are performed
- Support fair labor practices, including the right to belong to a trade union, the payment of at least the legal minimum wage

where such exists and a fair living wage where it does not

- Ensure respect for the dignity of individuals at work and zero tolerance for the harassment of individuals in any form and for any reason
- Provide a confidential and secure mechanism for employees to raise grievances
- Avoid discrimination against employees or potential employees on the basis of their race, color, nationality, ethnic origin, caste, gender, sexual orientation, gender reassignment status, marital status, disability, age, religion, belief, or membership/ non-membership of a trade union or sexual orientation. Issues of disability should only be considered against the particular requirements of the job.
- Maintain adequate documentation regarding its employees, including date of birth, employment and training

Gifts and Hospitality

Exchanging gifts and courtesies may be acceptable under certain conditions, but are not needed to conduct business with AMCOL. In fact, excessive business gifts and courtesies can raise ethical and legal questions that could harm suppliers and AMCOL.

Modest gifts, entertainment or courtesies are permissible if:

- They are consistent with accepted business practices and of modest value. Employees of AMCOL are prohibited from accepting anything more than modest gifts, meals and entertainment from suppliers. Under no circumstances are gifts of cash or cash equivalents, such as gift cards ever allowed.
- Public disclosure would not reflect adversely on the companies or the people involved.
- The transaction has been disclosed to an AMCOL supervisor if others could see the gift or courtesy as more than a mere token.
- The Supplier's own Code of Business Conduct permits the gift or courtesy. Supplier gifts and courtesies to AMCOL employees should never suggest or imply a desire for special treatment.

Protect the Environment

A. Compliance with the Law and Regulations

AMCOL believes that businesses must accept the responsibility to ensure that growth is achieved in a socially responsible manner and minimize any detrimental impacts on the environment.

AMCOL looks to suppliers as a key area through which to secure sustainability and requires the Supplier to take these issues seriously by abiding by relevant international or national standards or commitments and be a good citizen to the community surrounding its operations.

B. Environmental Practices

The Supplier shall operate in an environmentally responsible manner, including adhering to all applicable regulations, and take responsibility for its environmental impacts. Suppliers of goods should have a process in place to assess the potential impacts to the environment from their activities and applicable programs to minimize impact to communities and other stakeholders for environmental liabilities.

C. Product Stewardship

Environmentally Preferred Products: AMCOL values environmentally preferred products. We work with and encourage our suppliers to create products that are energy efficient, highly recyclable and contain significant amounts of recycled materials and low amounts of hazardous materials. If any Carcinogens, Mutagens, or Reproductive Toxins (CMRs) are contained in the products supplied to AMCOL or used during the processing of these products, AMCOL must be notified of the CMRs in writing.

Ozone-Depleting Substances: It is AMCOL's policy to eliminate from its products any components — including components provided by our suppliers — that contain or that are manufactured with a process that uses any Class I ozone-depleting substance. As outlined in the Internal Revenue Service's Publication 510, the U.S. government imposes an environmental tax on the sale or use of ozone-depleting chemicals and imported products containing or manufactured with these chemicals. Suppliers must provide certification that products imported into the U.S. do not contain or are not manufactured with a process that uses any Class I ozone-depleting chemicals.

Conflict Minerals: Suppliers shall certify that the products they supply to AMCOL do not contain any materials subject to Dodd-Frank Act (Section 1502) "Conflict Minerals in the Democratic Republic of Congo." In addition, the products supplied to AMCOL should be processed without using any of the so-called 3TG Metals (Tantalum, Tungsten, Tin, Gold) originating, sourced and/or smelted from the Democratic Republic of Congo or Africa.

Security, Health and Safety

Suppliers will operate a secure, safe and healthy work environment. Suppliers that provide housing or eating facilities will operate and maintain them in a safe, sanitary and dignified manner. In addition, the Suppliers of goods should have a process in place to assess the potential occupational safety and health hazards of their activities and applicable programs to minimize risk to employees and contractors.

Protect AMCOL's Technology, Information and Intellectual Property

A. Record Accuracy and Retention

The Supplier shall ensure that business records pertaining to AMCOL are retained for the period required by law and that it accurately and fairly reflect all business transactions.

B. Data Protection

The Supplier shall ensure compliance with laws and directives relating to the protection, transfer, access and storage of personal information.

C. Confidential Information

A Non-Disclosure Agreement must be signed between AMCOL and the Supplier or prospective Supplier prior to the disclosure of any confidential information. The Supplier (or its subsidiaries) shall not misuse or disclose of AMCOL's confidential information in breach of the non-disclosure agreement. This includes, but is not limited to, customer information, supplier information, knowledge of business plans or projections, sales or marketing programs, customer lists, significant legal or regulatory action or strategy, new products or price changes, changes in senior management and corporate transactions.

Reporting Breaches of the Code

Suppliers who believe that an employee of AMCOL, or anyone acting on behalf of AMCOL, has engaged in illegal or otherwise improper conduct, should report the matter to AMCOL. The supplier can contact AMCOL through the following link suppliercodeofconduct@amcol.com. A supplier's relationship with AMCOL will not be affected by an honest report of potential misconduct.