

UNIVAR

CODE OF CONDUCT

Univar Code of Conduct

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Univar Code of Conduct

Our Core Values and Mission Statement

The foundation to delivering on our commitment to our Mission Statement and our Core Values, and indeed to all of our activities as Univar employees, is our conviction and commitment that at all times we must act ethically and in compliance with applicable laws.

We expect and require that Univar employees at all levels — and most critically at the highest levels of management — comply with the law and appropriate ethical standards at all times.

Purpose of the Univar Code of Conduct

The purpose of this Code of Conduct is to state our policies on ethics, compliance with the law, business conduct, strengthen Univar's ethical climate, and provide basic guidelines for reporting and handling any ethics-related issues that may arise.

The Code of Conduct:

- Defines and disseminates our core values and legal requirements for business conduct.
- Offers guidance in understanding company policy, interpreting laws, and handling issues.
- Fosters clear ethical decision-making that creates trusting, enduring relationships throughout company activities.
- Provides procedures through which you can easily obtain information and ask questions or report any suspected violations of our business conduct policies.

Persons Covered by Code of Conduct

The Univar Code of Code applies to all employees of Univar N.V. and all of its greater than 50% owned subsidiaries and affiliates.

Ethics Univar strives to provide a corporate culture that gives you, the individual, a sense of trust in the company. Part of this mission is that employees feel that their own high values are affirmed. These values start with individuals like you and how you apply ethical behavior, for example:

- when using Univar resources
- when interacting with customers, suppliers, and competitors
- when signing off that a task has been completed appropriately
- when reporting hours worked or expenses incurred
- when dealing with a particularly tough deadline

Never make false statements or misrepresentations to anyone. If you believe a person may have misunderstood you, immediately address the misunderstanding. Honesty based on unambiguous communication is vital to ethical behavior; the resulting trust is essential to sound, enduring relationships.

Univar's Code of Conduct provides procedures by which you can disclose and resolve ethical issues. This Code explains how to proceed with such matters.

Compliance with Laws It is the policy of Univar to comply with all applicable laws, including, but not limited to, those pertaining to general employment, anti-discrimination, health, safety, antitrust, securities, anti-fraud, corruption and bribery and environmental protection. No officer, executive or manager of the Company has authority to violate any law or to direct another employee or any other person to violate any law on behalf of Univar.

We strive to do business with customers and suppliers of sound business character and reputation. We do not knowingly support any public or private organization that espouses discriminatory policies or engages in anti-competitive practices.

Employee Compliance Each employee of Univar is, and will be held, responsible for the observance of this Code of Conduct. If you have questions about any section of this Code of Conduct, direct your questions to your immediate supervisor, the Univar Compliance Officer, Human Resources, or the Univar Legal Department. The Univar Compliance Officer is Leslie Schenck, Vice President and Associate General Counsel.

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Where the subject of the complaint is such that Supervisory Board attention is appropriate, Ms. Schenck has been directed to forward the complaint to the Chairman of the Supervisory Board.

If you learn that another employee has violated this Code of Conduct, you are obligated to report it. Retaliation against an employee who reports a violation or possible violation will not be tolerated.

Failure to comply with any of the provisions of this Code of Conduct subjects employees to disciplinary measures up to and including termination of employment.

Our Values Help Us Maintain Our Safety Record

Our excellent safety record contributes to our leading position in the chemical distribution industry and reflects the ethical behavior inherent in how we do business. Safety results, in part, from our ethical and legal behavior.

Code of Conduct is a Summary; Refer to Complete Policies

This Code of Conduct summarizes a number of Univar policies and is supplemented by training programs and explanations, all of which are available on the company websites. Employees are required to read and understand all policies and related materials.

Waivers and Explanations

This Code of Conduct by necessity is general in nature and does not provide specific guidance for every situation that may arise. Conduct that may appear to be prohibited under the Code may be, in fact, be appropriate and acceptable. Conversely, behavior meeting the letter of the law but not the spirit of ethical behavior may be proscribed. Your obligation in any case of doubt or uncertainty is to seek guidance from your immediate supervisor, the Univar Compliance Officer, Human Resources, or the Univar Legal Department.

Business Ethics and Fair Competition

Univar is committed to maintaining the highest standards of business ethics, fair competition, and compliance with all applicable laws.

Univar believes that success is measured and achieved by:

- The quality of our services
- The integrity of our marketing strategy
- Our competitive pricing policies
- Not engaging in illegal or unethical practices

It is the policy of Univar to:

- Cultivate among our officers and employees a sense of individual and organizational responsibility that fosters the highest level of conduct in every aspect of our business.
- Promote compliance with applicable laws by providing ongoing training programs for our officers and employees.
- Continuously improve existing programs that enhance Univar's ability to promptly identify activities by our officers or employees that do not meet the highest standards of business ethics; and
- Require each officer and employee to cooperate fully with any investigation by the company or any governmental agency.

Your commitment to this policy ensures Univar continues to be the leader in chemical distribution services and provides a quality work environment.

Univar Policies and Practices

Employment Policies

Univar is committed to fostering a work environment in which all individuals are treated with respect. You are entitled to work in a businesslike atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Therefore, Univar expects that all relationships among persons in the workplace will be businesslike and free of unlawful bias, prejudice and harassment.

It is Univar's policy to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, national origin, religion, sex, age, disability, veteran status or any other status protected by law. It is Univar's policy to comply with all applicable wage and hour laws and other statutes regulating the employer-employee relationship and the workplace environment.

No Univar employee may interfere with or retaliate against another employee who seeks to invoke his or her rights under the laws governing labor and employee relations.

If you have any questions about the laws or Company policies governing labor and employee relations matters, consult the relevant company websites, your Employee Handbook or contact Human Resources.

Univar is committed to providing a safe workplace for all employees. In addition, laws and regulations impose a responsibility on the Company to safeguard against health and safety hazards. For that reason, and to protect the safety of themselves and others, employees and other people who are present at Univar facilities are required to follow carefully all safety instructions and procedures the Company adopts.

Questions about possible health and safety hazards at any Univar facility should be directed immediately to your supervisor.

Your Privacy

Univar holds personal information relating to your employment. This may include your name, title and contact information, evaluative and performance information, and financial, benefits and compensation information. Univar collects and processes this information for employment-related purposes only, including to administer the employment relationship (including the payment of salaries, benefits, and other compensation), to evaluate performance, to conduct strategic planning, to administer disciplinary actions where necessary, and to conduct financial and operational analysis. Access to this personal information is limited to authorized Univar personnel who have a legitimate need. Personal information is released outside Univar only with employee permission, except as necessary or appropriate in connection with the employment relationship (including disclosures to payroll processors, benefits providers, and certain financial institutions), in order to verify employment, or in response to legal or investigatory requirements. Employees may also access and review their own personal information in accordance with applicable local laws by contacting their local human resources manager.

Employees responsible for maintaining such personal information and those who are additionally provided with access to it must ensure that the information is not disclosed in violation of Univar's policies or practices.

Conflicts of Interest

A conflict of interest may arise in any situation in which your loyalties are divided between Univar and business interests that, to some extent, are incompatible with the interests of Univar.

The Company expects that no employee will knowingly place himself or herself in a position that is or would appear to be in conflict with the interests of Univar. Some of the more sensitive areas regarding conflicts of interest and Univar's related guidelines are described below. Many apparent conflicts of interest can be addressed through disclosure and waivers from an authorized person. You must fully disclose any matter that may constitute a conflict of interest.

Outside Activities

Freelance Work

It is the policy of Univar that employees shall not have a second job that encroaches on the time or attention that should be devoted to work duties; adversely affects the quality of work performed; competes with Univar's activities; implies sponsorship or support by the Company of the outside employment or organization; or adversely affects the reputation of Univar.

If you perform side work or have another job, be sure that you do not use Company time, facilities, resources, or supplies for such work!

Interests in Other Businesses

Unless approved in advance by your supervisor, neither you nor your spouse, domestic partner, or any other member of your immediate family may directly or indirectly have a financial interest (whether as an investor, lender, employee or other service provider) in a competitor, or in a customer or supplier if you or your subordinates deal directly or indirectly with that customer or supplier in the course of your job with Univar. Investments of less than 1% of the outstanding stock of public companies are exempted from this prohibition.

Use of Company Property and Information

All employees are responsible for the proper use of Univar's resources and property, as well as its proprietary and other confidential information. Unless otherwise prohibited by your supervisor, incidental use of a Company telephone, computer or other equipment is permitted. Please be aware that you have no right to privacy in any data on Company computers or other equipment. Any data on Company equipment may be lost or unavailable to you.

Company Property and Facilities

Univar property, facilities and physical resources may not be used for solicitation or distribution activities that are not related to an employee's services to Univar, except for charitable activities that have been approved in writing in advance by the Company.

You may not solicit another employee during working time, nor distribute literature in work areas at any time. You should not, under any circumstances, disturb the work of others to solicit or distribute literature to them during their working time. Persons not employed by Univar may not solicit Univar employees for any purposes on Company premises.

Any employee found to be engaging in or attempting theft of any property of Univar, including documents, equipment, intellectual property, personal property of other employees, cash or any other items of value, will be subject to immediate discharge and possible criminal proceedings. You have a responsibility to report any theft or attempted theft to Univar management.

Univar Proprietary and Other Confidential Information

Univar operates in many different and extremely competitive markets. You must be aware that in any competitive environment, proprietary information and trade secrets must be safeguarded in the same way that all other important Company assets are protected. Confidential information includes information concerning customers, suppliers, pricing, products, business strategies and business plans, business results and financial and other such trade secrets, including information pertaining to any prospective Univar acquisition or divestiture, and it must be held in the strictest confidence. Reasonable prudence should be exercised in dealing with such information to avoid inadvertent inappropriate disclosure.

Proprietary information must not be used in any way other than as required in performing your employment duties. All files, records and reports acquired or created in the course of employment are the property of Univar. Originals or copies of such documents may be removed from Univar's offices for the sole purpose of performing your duties to the Company and must be returned upon request.

Intellectual Property

Software License Agreements

Much of the computer software used at Univar was created and copyrighted by other companies. It is Univar policy to fully comply with license agreements that govern the use of software. Reproducing or installing software without authorization may violate these agreements and be illegal. Never make copies, resell, or transfer software created by another company unless it is authorized under the applicable software license agreement.

Trademarks, Service Marks and Copyrights

Trademarks and service marks—words, slogans, symbols, logos or other devices used to identify a particular source of goods or services—are important business tools and

valuable assets that require care in their use and treatment. You cannot negotiate or enter into any agreement relating to Univar's trademarks, service marks or logos without first consulting the Univar Legal Department.

Univar also respects the trademark rights of others and any proposed name of a new product, financial instrument or service intended to be sold or rendered to customers must be submitted to the Univar Legal Department for clearance prior to its adoption and use. Similarly, using the trademark or service mark of another company, even one with whom Univar has a business relationship, always requires clearance or approval by our Legal Department to ensure that the use of the other company's mark is proper.

You must avoid the unauthorized use of copyrighted materials of others and should confer with the Univar Legal Department if you have any questions regarding the permissibility of photocopying, excerpting, electronically copying or otherwise using copyrighted materials. In addition, simply because material is available, such as files downloaded from the Internet, does not mean it is automatically permissible to copy or recirculate (by, for example, e-mail or posting to the Univar intranet site).

All copies of work that is authorized to be made available for ultimate distribution to the public, including all machine-readable works such as computer software, must bear the prescribed form of copyright notice.

Univar-related Employee Creations and Ideas

Univar is legally entitled to all rights in ideas, inventions and works of authorship relating to its business that are made by employees during their employment with Univar or while using the resources of the Company ("Employee Developments"). As a condition of employment, employees are required to promptly disclose all employee ideas to their supervisors, and to execute the necessary documentation to transfer all employee developments to Univar to evidence their ownership, or to obtain legal protection for them.

Political Involvement

You are free to exercise your right to make individual political contributions. Univar will not reimburse any employee for political contributions, and employees should not attempt to receive or facilitate such reimbursements. No contribution may be made with the expectation of favorable government treatment in return.

Univar's policy is not intended to discourage or prohibit you from taking part in the following activities:

- Personally and voluntarily contributing to political candidates and organizations
- Engaging in the political process on your own time and at your own expense
- Expressing views on legislative and related matters
- Participating in any other lawful political events or activities

Any political activity or contribution that might appear to constitute an endorsement or contribution by Univar must be approved in advance by the Compliance Officer or the Univar Legal Department.

Accepting Gifts and Entertainment

Univar's aim is to deter givers of gifts from seeking or receiving special favors from Company employees. Accepting any gift of more than nominal value or entertainment that is more than a routine social amenity can appear to be an attempt to influence the recipient into favoring a particular customer, vendor, consultant or the like. To avoid the reality or the appearance of improper relations with current or prospective customers, vendors and consultants, you must observe the following guidelines when deciding whether to accept gifts or entertainment:

Gifts

Gifts such as merchandise or products, as well as personal services or favors, may not be accepted unless they are of a type and amount as are reasonable and customary under the circumstances and are not designed to, nor have the effect of, influencing the recipient's judgment. You are urged to consult with the Compliance Officer before accepting any gifts of more than nominal value. Gifts of any amount may never be solicited. A gift of cash or securities may never be accepted.

In some countries it is customary and lawful for business leaders in a host country to give gifts to Univar employees. These gifts may be of more than nominal value and under the circumstances returning the gifts or paying for them may be an affront to the giver. In such a situation, the gift must be reported to the employee's supervisor.

In all other instances where gifts cannot be returned and offering to pay for them would adversely affect continuing business relationships, supervisors must be notified. In some cases, the gift may be retained by the Company, at its sole discretion, rather than by the actual recipient.

Entertainment

Normal business entertainment such as lunch, dinner, theatre, a sporting event, and the like, is appropriate if of a reasonable nature and in the course of a meeting or another occasion where the purpose is to hold bona fide business discussions or to foster better business relations.

Securities Laws

Employees may not trade in (or even recommend) Univar stock or the stock of any other companies based on inside information. "Insider trading" is the purchase or sale of a publicly traded security while in possession of "Inside Information". Inside Information is non public information which can be reasonably expected to influence the stock prices, either up or down. Such information includes, for example, non-public information on:

- Company earnings

- Changes in dividends
- Financial results
- Possible mergers, acquisitions, joint ventures, and other purchases and sales of or investments in companies
- Financial forecasts
- The hiring, firing or resignation of a director or officer of the Company
- Any other

Insider trading, as well as “tipping”, which is communicating such information to anyone who might use it to purchase or sell securities, constitute activities prohibited by the securities laws. When in doubt, information obtained as an employee of Univar should be presumed to be important and not public.

If you have questions pertaining to the sale or purchase of a security under circumstances that might involve confidential information or securities laws, consult with the Compliance Officer or the Univar Legal Department.

Accounting and Recordkeeping

Employees with supervisory duties should establish and implement appropriate internal accounting controls over all areas of their responsibility to ensure the safeguarding of the assets of the Company and the accuracy of its financial records and reports. Univar has adopted controls in accordance with internal needs and the requirements of applicable laws and regulations. All staff, within their areas of responsibility, are expected to adhere to these procedures, as directed by appropriate Univar officers.

Any accounting adjustments that materially depart from Generally Accepted Accounting Principles (GAAP) must be approved by the Audit Committee and reported to Univar’s independent auditors. In addition, all material off-balance sheet transactions, arrangements and obligations, contingent or otherwise, and other relationships of the Company with unconsolidated entities or other persons that may have material current or future effects on the financial condition, changes in financial condition, results of operations, liquidity, capital expenditures, capital resources or significant components of revenues or expenses, must be disclosed to the audit committee and Univar’s independent auditors.

No employee may interfere with or seek to improperly influence, directly or indirectly, the auditing of Univar’s financial records. Violation of these provisions will result in disciplinary action, up to and including discharge, and may also subject the violator to substantial civil and criminal liability.

If you become aware of any improper transaction or accounting practice concerning the resources of the Company, report the matter immediately to your supervisor or to a member of the Audit Committee.

If you have information regarding questionable accounting or auditing matters, you may also file a confidential, anonymous complaint with the Univar Compliance Officer. Univar

will not tolerate any form of retaliation against employees who disclose questionable accounting or auditing matters.

Computer, E-mail and Internet Policies

You are responsible for properly using the Company's computer system, including, but not limited to, its electronic mail (e-mail) system and the Internet (collectively, the "Computer System") in accordance with Univar policies.

The Computer System Is Company Property

The computers that employees are provided, or have access to for work, and the e-mail system are the property of Univar and have been provided for use in conducting Company business. All communications and information transmitted by, received from, created or stored in the Computer System (whether through word processing programs, e-mail, the Internet or otherwise) are Company records and the property of Univar.

No Expectation of Privacy

Univar has the right, but not the duty, for any reason and without the permission of any employee, to monitor any and all aspects of its Computer System, including, but not limited to, reviewing documents created and stored on its Computer System, deleting any material stored in its system, monitoring web sites visited by employees on the Internet, monitoring chat and news groups, reviewing material downloaded or uploaded by users from the Internet, and reviewing e-mail sent and received by users. You should not have an expectation of privacy in anything you create, store, view, send, or receive on the Computer System.

Professional Use of Computer System Required and Application of Other Policies

Please be courteous to other users of the Computer System and always conduct yourself in a professional manner. The Company's policies against discrimination and harassment (sexual or otherwise) apply fully to the Computer System and materials placed in it and any violation of those policies is grounds for discipline up to and including discharge.

Offensive and Inappropriate Material, Illegal Activities

Company policies prohibit using the Company's Computer System to send or receive messages or files that are illegal, sexually explicit, abusive, offensive or profane.

Solicitations

Unless authorized in advance the Company's computer system may not be used to solicit for religious or political causes, commercial enterprises, outside organizations, or other activities not related to an employee's services to Univar.

Copyrights and Trademarks

Univar's Computer System may not be used to send (upload) or receive (download) copyrighted materials, trade secrets, proprietary financial information, or similar materials.

Document Retention

The space available for the storage of Univar documents, both on paper and electronically, is limited and expensive. Therefore, periodic discarding or destruction of documents is necessary. There are also legal requirements that certain records be retained for specific durations.

Before you dispose of documents, consult the applicable record retention schedule or disposition schedule. If you are unsure about the requirements for keeping particular documents, consult your supervisor, who may need to consult the Records and Information Specialist within the Legal Department.

When documents are found to be required in connection with a lawsuit or government investigation, all possibly relevant documents should be preserved, and ordinary disposal or alteration of documents pertaining to the subjects of the litigation or investigation should be immediately suspended. If you are uncertain whether documents under your control should be preserved because they might relate to a lawsuit or investigation, you must contact the Univar Legal Department.

Former Government Employees

Many laws restrict the hiring as an employee or retaining as a consultant a former government employee. These restrictions also cover informal arrangements for prospective employment under certain circumstances. Therefore, written clearance must be obtained from the Univar Legal Department before discussing proposed employment with any current government employee and before hiring or retaining any former government employee who left the government within the past two years.

Compliance with the Code of Conduct

You have a responsibility to understand and follow this Code of Conduct. A violation of the Code of Conduct may result in appropriate disciplinary action including possible discharge from employment with Univar without additional warning.

Univar encourages discussions among employees and their supervisors to make everyone aware of situations that give rise to ethical questions and to articulate acceptable ways of handling those situations. Each employee of Univar may be required from time to time to certify that he or she has read and reviewed this Code of Conduct and to the best of his or her knowledge is in compliance with all of its provisions.

The Code of Conduct reflects general principles to guide you in making ethical decisions and cannot and is not intended to address every specific situation. As such, nothing in this Code of Conduct prohibits or restricts Univar from taking any disciplinary action on any matters pertaining to employee conduct, whether or not they are expressly discussed in this document.

The Executive Directors of Univar have the exclusive responsibility for the final interpretation of the Code of Conduct. The Code of Conduct may be revised, changed or amended at any time by Univar.

Global Business and Applicable Laws

Univar conducts business in many countries. Our employees are citizens of different nations and, as a result, our operations are subject to the laws of several countries, provinces, states, and municipalities.

A challenge for us is understanding how these laws apply to our operations. The laws of one country may extend to the operations of Univar and its affiliates throughout the world. For example, Univar, as a Dutch company, is subject to Dutch securities, financial accounting, and corporate governance laws. Other countries may also apply their own laws outside of their borders to their own citizens and to corporations that are organized under their laws, such as Univar subsidiaries and other controlled affiliates. In some instances, there may be a conflict between the applicable laws of two or more countries. When you encounter such a conflict, it is especially important to consult the Legal Department to understand how to resolve the conflict.

Antitrust Laws

Many governments have enacted antitrust or “competition” laws. Their purpose is to ensure that markets for goods and services operate competitively and efficiently, so that customers enjoy the benefit of open competition among their suppliers, and sellers similarly benefit from competition among their purchasers.

In the United States and some other jurisdictions, violations of the antitrust laws can lead to substantial civil liability—triple the actual economic damages to a plaintiff. Moreover, violations of the antitrust laws are often treated as criminal acts that can result in felony convictions of both corporations and individuals.

Some types of conduct are always illegal under the antitrust laws of the United States and many other countries. Employees and other representatives of Univar must be alert to avoid even the *appearance* of such conduct. These consist of agreements with competitors:

- to set prices or any other economic terms of the sale, purchase or license of goods or services, to use a common method of setting prices, or to set any conditions of sale or purchase;
- on any terms of a bid or whether or not to bid;
- to allocate or limit customers, geographic territories, products or services, or not to solicit business from each other in one or more ways;
- not to do business with (to “boycott”) one or more customers, suppliers, licensors or licensees; and

- to limit production volume or research and development, to refrain from certain types of selling or marketing of goods or services, or to limit or standardize the features of products or services.

Also prohibited are agreements with customers or licensees on the minimum resale price or price levels (e.g., discounts) of Univar's goods or services.

You should avoid all conversations with competitors concerning business activities and transactions. In your conversations with competitors, do not discuss the following items:

- Pricing policy
- Terms and conditions of sale
- Costs
- Inventories
- Marketing and product plans
- Market surveys and studies
- Any other proprietary or confidential information

If a competitor brings up any of these items, even lightheartedly or with seeming innocence, you should stop the conversation right away and tell the competitor that under no circumstances can you talk about these matters. If you're in a meeting, you should announce that you are leaving and then depart in a memorable manner. Contact the Legal Department immediately to report the incident.

This section of the Code of Conduct is not intended as a comprehensive review of antitrust laws, and is not a substitute for expert advice. If you have questions concerning a specific situation, contact the Compliance Officer or the Univar Legal Department before taking action.

International Operations

Laws and customs vary throughout the world, but all employees must uphold the integrity of Univar in all countries in which it does business. It is imperative that employees be sensitive to all legal requirements including United States laws that apply to foreign operations, including the Foreign Corrupt Practices Act. The Foreign Corrupt Practices Act generally makes it unlawful to give anything of value to foreign government officials, foreign political parties, party officials, or candidates for public office for the purposes of obtaining, or retaining, business for Univar.

Sanctions and Trade Embargoes

Employees must abide by all economic sanctions or trade embargoes imposed by applicable laws, whether they apply to foreign countries, political organizations or particular foreign individuals and entities. Inquiries regarding whether a transaction on

behalf of Univar complies with applicable sanction and trade embargo programs should be referred to the Compliance Officer or the Univar Legal Department.

Relationships with Public Officials

Some employees do business with federal, state or local government agencies. All employees engaged in business with a governmental body or agency must know and abide by the specific rules and regulations covering relations with public agencies. Such employees must also conduct themselves in a manner that avoids any dealings that might be perceived as attempts to influence public officials in the performance of their official duties.

Bribery, Kickback and Fraud

No funds or assets of the Company shall be paid, loaned or otherwise disbursed as bribes, "kickbacks," or other payments to the individual benefit of a person designed to influence or compromise the conduct of the recipient; and no employee of Univar shall accept for his or her personal benefit any funds or other assets (including those provided as preferential treatment to the employee for fulfilling their responsibilities), for assisting in obtaining business or for securing special concessions from the Company. Rebates and volume discounts paid to Univar by its suppliers or by Univar to the person or entity that made the purchase are not illegal bribes or kickbacks.

Univar employees should conduct their business affairs in such a manner that the Company's reputation will not be damaged if the details of the dealings should become a matter of public discussion. To illustrate the strict ethical standard Univar expects of every employee, the following conduct is expressly prohibited:

- Payment or receipt of money, gifts, loans or other favors that may tend to influence business decisions or compromise independent judgment
- Payment or receipt of rebates or "kickbacks" for obtaining business for or from Univar
- Payment of bribes to government officials to obtain favorable rulings
- Any other activity that would similarly degrade the reputation or integrity of Univar

Any employee found to be receiving, accepting or condoning a bribe, kickback, or other unlawful payment, or attempting to initiate such activities, will be subject to discharge and possible criminal proceedings. Any employee found to be attempting fraud or engaging in fraud will be subject to discharge and possible criminal proceedings against them. All employees have a responsibility to report any actual or attempted bribery, kickback or fraud to Univar.

Safety, Health and Environmental Policy

Safe practices, healthy working conditions and conservation of our environment are essential to achieve sustainable profitability and continuity for our company and for our employees.

- We are committed to protecting the environment, the safety and health of our employees, our customers, our contractors, the community and other third parties in relation to all our activities.
- We are committed to continuous improvement in our processes to manage safety, health and environmental performance.
- We are committed to contributing to the continuity of our company through the recognition, evaluation and control of hazards. We aim for zero incidents.
- Our environmental policies and objectives will strictly adhere to all governing regulations, as a minimum.
- We consider safety, health and the environment a line management responsibility. We require every Univar manager to give visible commitment to provide the resources of personnel, time and money necessary to support the implementation of our safety, health and environmental policy.
- Every employee contributes to the prevention of accidents by identifying, analyzing, and controlling safety, health and environmental hazards, supported by training programs adapted to their function.

Reporting of Suspected Non-Compliance

General Policy

As part of its commitment to ethical and legal conduct, Univar expects its employees to bring to the attention of their supervisors or the Compliance Officer any information about suspected violations of this Code of Conduct or of law by any Univar employee or agent. Employees who have information about suspected improper accounting or auditing matters should bring it to the attention of their supervisors and/or a member of the audit committee, or submit an anonymous complaint. Employees are required to come forward with any such information, without regard to the identity or position of the suspected offender. Univar will treat the information in a confidential manner (consistent with appropriate evaluation and investigation) and will seek to ensure that no acts of retribution or retaliation are taken against anyone for making a report.

Because failure to report criminal activity can itself be understood to condone the crime, we emphasize the importance of reporting. Failure to report knowledge of wrongdoing may result in disciplinary action against those who fail to report.

Complaint Procedure

Information about known or suspected violations by any employee or agent should be reported promptly. When practical, an employee should do so in writing.

- Investigation - Reports of violations will be investigated under the Compliance Officer's supervision, as he or she finds appropriate. Employees are expected to cooperate fully in the investigation of reported violations.
- Confidentiality - The Compliance Officer will not, to the extent practical and appropriate under the circumstances to protect the privacy of the persons involved, disclose the identity of anyone who reports a suspected violation or who participates in the investigation. Employees should be aware that the Compliance Officer and those assisting him or her are obligated to act in the best interests of Univar, and do not act as personal representatives or lawyers for employees.
- Protection Against Retaliation - Retaliation in any form against an individual who reports a violation of this Code of Conduct or of law, even if the report is mistaken, or who assists in the investigation of a reported violation, is itself a serious violation of this policy. Acts of retaliation should be reported immediately and will be disciplined appropriately.