



UNITED BY INTEGRITY



HARSCO

Our Code of Business Conduct

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A Message from Our CEO



“Our Code underpins everything we do as a business, an employer and a responsible member of our communities.”

I am proud to present Harsco’s Code of Business Conduct to you. Our Code underpins everything we do as a business, an employer and a responsible member of our communities. It is our moral compass, pointing us in an ethical direction to help us make good decisions and good choices.

Our Code shows us how to turn our Harsco values into everyday behaviors. It is our guide to conducting business with integrity. Use it whenever you are faced with tough decisions in your day-to-day work, whether you are working in one of our facilities, on a job site or from some other location. Look to the Code when you want to make sure that an action is appropriate and complies with our policies.

If anything in our Code is unclear to you, or you are uncertain about what to do, talk to your manager, Global Compliance & Ethics or one of our other resources. If you see or suspect a violation of our Code, our policies, our procedures or the law, report it to the Harsco Integrity Line.

Knowing and doing what is right are the keys to preserving our heritage – a heritage that spans more than 160 years since our founding. Our Code connects us to our values and to each other. United by integrity, each of us continues to make important contributions to our success.

A handwritten signature in black ink that reads "Nick Grasberger". The signature is stylized and cursive.

Nick Grasberger
President & CEO

Our Values Matter

Harsco’s Business System and Values are interrelated. They are a set of core principles and practices that help define the character and focus of our worldwide Harsco enterprise. At the center is our Code of Business Conduct.

Harsco Business System (outer ring)

Acquisitions and Divestitures: Execution of a portfolio-based strategy in support of Harsco’s global growth objectives

Strategic Planning: Rigorous and consistent processes to constantly identify opportunities for business growth and competitive advantage

Environmental, Health and Safety: Disciplined programs and procedures that align with our organizational commitment to Zero Harm to people and planet

Continuous Improvement: The relentless pursuit of improvement in all aspects of our business

Talent Development: Structured approach throughout the employee life-cycle emphasizing individual growth and achievement in alignment with business strategy

Values (inner ring)

Integrity: Uncompromising commitment to ethical principles

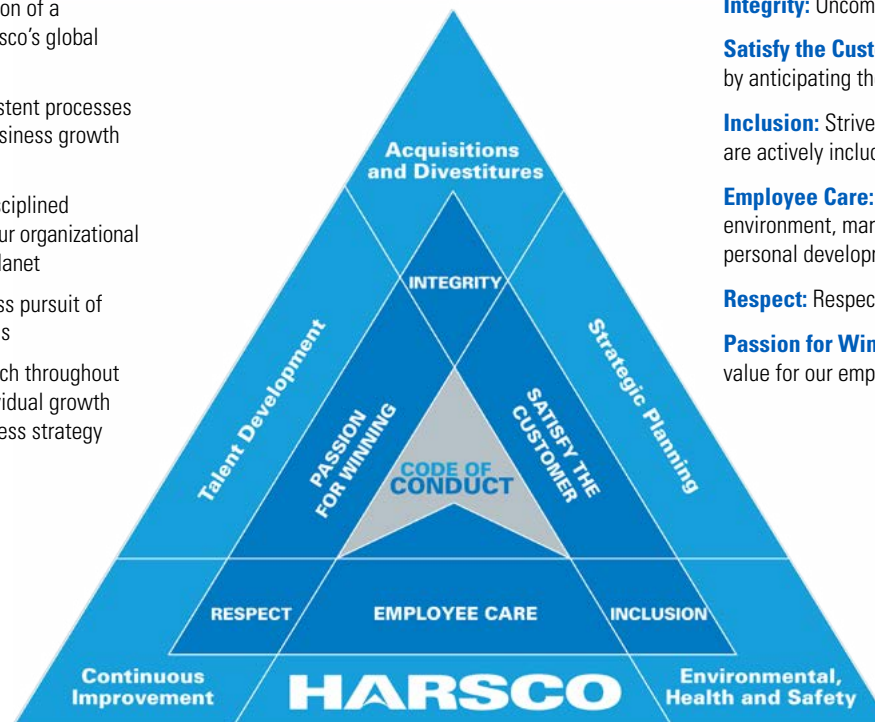
Satisfy the Customer: Win customer loyalty and satisfaction by anticipating their needs, and consistently delivering value

Inclusion: Strive to create an environment where all people are actively included

Employee Care: Commitment to a safe, appealing work environment, market-competitive benefits and investment in personal development

Respect: Respect for all individuals and their contributions

Passion for Winning: Winning through creating exceptional value for our employees, customers and shareholders





1. My Commitment to the Code

- [1.1 Purpose of the Code](#)
- [1.2 Speaking Up](#)
- [1.3 The Integrity Line](#)
- [1.4 Violations of Our Code](#)
- [1.5 Anti-Retaliation Policy](#)
- [1.6 Responsibility of Management](#)

Why It Matters

Our Code helps you transform our Harsco values into everyday action. When you apply the Code to the work you do, you bring out the best in yourself, your coworkers and others with whom you do business – you build a winning team.

1.1

Purpose of the Code



Fairness, honesty and ethical behavior are the basic characteristics of an ethical culture. And an ethical culture inspires passion for doing good work. As you comply with our Code, you become an important contributor to our culture. When you and your coworkers behave ethically at work – and understand the difference between what is acceptable and what is not – we become a stronger, more inspired team that is better prepared to achieve our goals.

The Code applies to all Harsco employees worldwide. We expect our contractors, consultants, representatives, suppliers and all third-party business partners to comply with applicable provisions of our Code when working with us. If you are responsible for relationships with any Harsco third parties, make sure that any contract or personal service agreement includes the appropriate requirements. For more information, contact the [Legal department](#) for advice.



It's My Job

- ✓ **Live our values: Integrity, Satisfy the Customer, Inclusion, Employee Care, Respect and Passion for Winning.**
- ✓ **Comply with the Code, our policies, our procedures and the law.**
- ✓ **Avoid even the appearance of misconduct.**
- ✓ **Be honest, fair and trustworthy.**
- ✓ **Ask questions.**
- ✓ **Seek help whenever you are not certain of what's right.**

Our Code is a global code. Because we do business in many countries, you are also responsible for following the laws that apply where you work – including U.S. regulations that apply outside of the United States. If a local law or custom conflicts with the Code, follow the stricter requirement or contact [Global Compliance & Ethics](#) or the [Legal department](#) for advice.

How to use our code. Our Code gives the basic legal guidelines and ethical principles you must follow to make the right decision. However, it

cannot address every ethical situation you might face on the job. If you encounter something that is not covered by our Code and the right path is not clear, ask your manager for help, or contact any of the groups listed in the Resources section. In every situation, always use common sense and sound judgment. You may also want to access our detailed policies, which are available online through our Harsco Information Exchange portal. If you do not have access to a company computer, your manager or local HR representative can provide the policies to you.

What If...?

Q. Some of the requirements at our location seem to differ from what's required by our Code.

A. You should follow the more stringent requirement. If you are uncertain or have a question, speak with your supervisor or consult Global Compliance & Ethics for advice.



1.2

Speaking Up

We all share an obligation to speak up when we suspect unethical behavior. This promotes a positive workplace and enhances our reputation as a Company. Discuss any concern any time. Don't tolerate misconduct. If you see or suspect a violation of our Code, our policies, our procedures or the law, speak up.

If you have a question or suspect a violation of our Code, talk with your immediate supervisor.

He or she is in the best position to understand your concern and take the appropriate action. If you are uncomfortable approaching your supervisor or have spoken to your supervisor and are not satisfied with the response, there are other resources available to help you. You may contact another member of management, [Global Compliance & Ethics](#) or the [Integrity Line](#). Contact information for these and other resources is available on the [Resources](#) page of this Code.

Don't Make Excuses. Speak Up!

Excuses like these can put us at risk.

"It's not my problem."

"I will wait until it happens again."

"For such a small thing, it's not worth it."

"It's not my job."

"It won't make any difference."

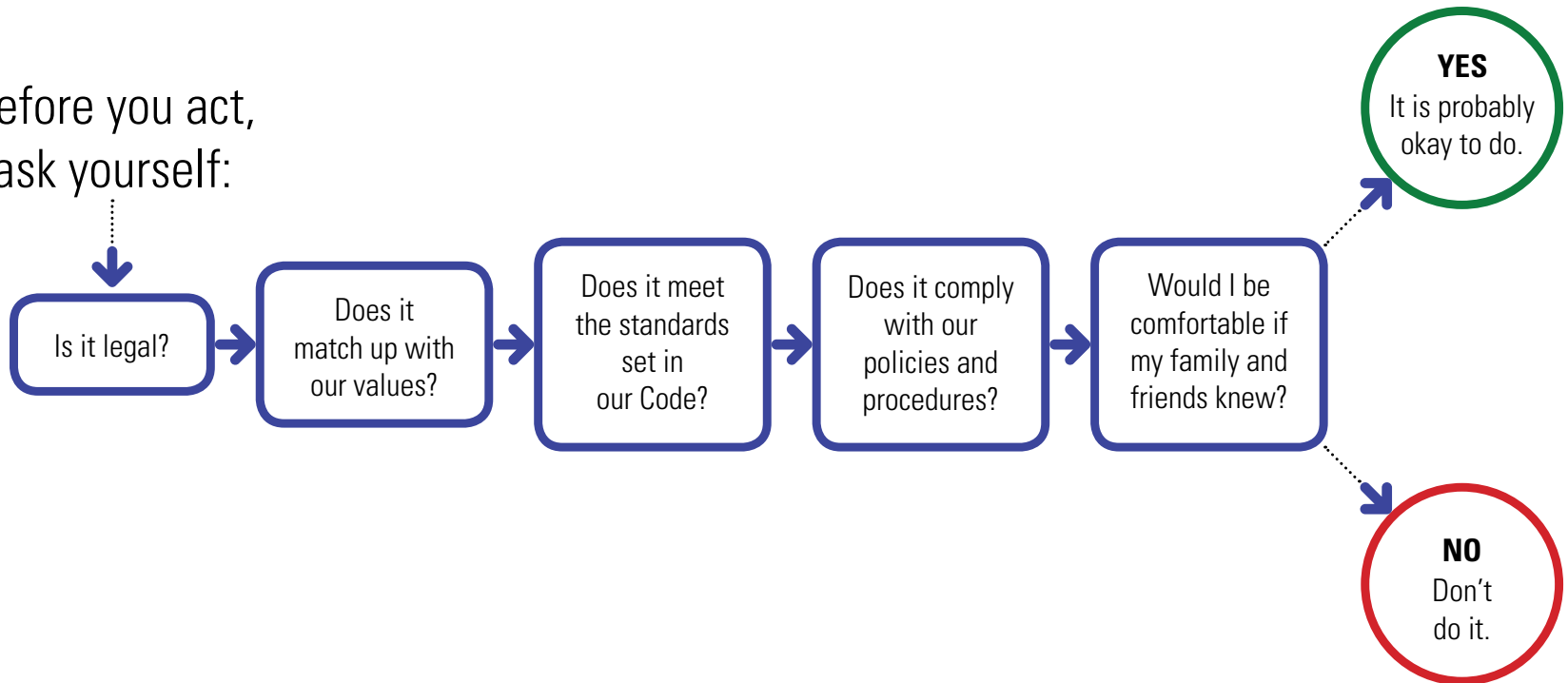
"Just this once, it can't hurt anyone."

"The Company can afford it."



Do What Is Right

Before you act,
ask yourself:



1.3

The Integrity Line

Report by phone:
In the U.S.:
866-203-4957
Outside the U.S.: [click here](#)
for local access numbers and
dialing instructions
Or report online: [click here](#)

You may report issues any hour of the day or night using the Harsco [Integrity Line](#). It's a resource you can use any time you suspect a violation of our Code, our policies, our procedures or the law.

Who operates the Integrity Line? The Integrity Line is operated by a third-party organization. No matter where you work, anywhere in the world, you may contact the Integrity Line, 24/7, via phone or online to confidentially share your concern. You may even remain anonymous, where permitted by law.

What happens next? Your information is confidentially relayed to Harsco for investigation and follow-up. After making a report, you can

check back to inquire about the status of the investigation and to provide clarification or further information, if needed – which is important if you have reported anonymously. As an employee, you have a responsibility to cooperate with any investigation.

In certain countries, the Integrity Line may only accept reports that relate to specific types of conduct (for example, financial, accounting, auditing or bribery matters). If you are calling about a matter that should be handled locally in accordance with local legal requirements, the Integrity Line specialists will direct you back to local management.

What If...?

Q. If I suspect misconduct, is it better to contact my supervisor, another member of management, Global Compliance & Ethics or the Integrity Line?

A. One isn't necessarily better than the other. Use the resource with which you feel most comfortable. The most important thing is that you share your concerns.

1.4

Violations of Our Code

After a thorough investigation, anyone discovered to be in violation of the Code, our policies, our procedures or the law may be subject to corrective action. Depending on the facts involved, violations of the Code may lead to termination of employment or criminal prosecution.

What If...?

Q. I believe a coworker is stealing from the Company, but she is a friend and I don't want to get her in trouble.

A. Unethical conduct has a negative effect on everyone and can affect the morale, reputation and well-being of the entire Company. If you know or suspect your coworker is stealing, you should say something. Speaking up when appropriate is an essential part of what personal integrity is all about.



It's My Job

- ✓ **Don't wait; if you suspect something is wrong, speak up right away.**
- ✓ **Be honest and complete in communicating the issue.**
- ✓ **Base reports on what you believe to be true at the time.**
- ✓ **If you are unsure of what action to take, get help from one of our Resources.**

1.5

Anti-Retaliation Policy

Compliance with our ethical standards is everyone's business. When you speak up, you're doing the right thing. As a Company, we do not tolerate retaliation against anyone who shares a concern in good faith. Good faith means you are

reporting something you honestly believe to be true and not making a malicious or false report. Never fear retaliation or let it discourage you from asking questions or sharing concerns. If you experience or see retaliation, report it.

**Learn More:**

[Anti-Retaliation Policy](#)


What If...?

- Q.** I want to contact the Integrity Line to report an incident, but I'm worried that everyone in my department will find out about it.
- A.** All questions and concerns are taken seriously and treated confidentially. During the

investigation process, we only share information on a need-to-know basis as permitted by law, in order to resolve the issue. If you feel that you have been retaliated against for reporting a possible violation or cooperating in an investigation, report the retaliation immediately.

1.6

Responsibility of Management

Harsco managers and supervisors and others who direct or guide our work are responsible for leading by example. They do this by honoring our Code and modeling the highest standards of integrity in their words and actions. If you are a manager, supervisor or similar leader, you are expected to live our values every day. Ensure that your team understands and uses the Code and is up to date on the policies, procedures and internal controls that apply to their roles.

Create a culture of compliance that encourages employees to feel comfortable raising concerns without fear of retaliation. Take a personal interest in ethical, lawful conduct and consider compliance efforts when evaluating and rewarding employees. Ensure that employees understand that business results are never more important than ethical conduct and compliance with Harsco policies.



Learn More:

[Internal Control Framework Policy](#)



What If...?

Q.

An employee came to me, her supervisor, to discuss a possible Code violation involving another supervisor.

A.

Listen carefully and encourage the employee to share all the information with you. Help clarify the problem and, if necessary assist the employee to report the incident to Global Compliance & Ethics, Human Resources or the Integrity Line.



It's My Job

If you are in a position of leadership, you are expected to...

- ✓ **Inspire excellence in your team members.**
- ✓ **Keep your door open for suggestions and ideas.**
- ✓ **Actively encourage your employees to read and follow the Code and to come to you with any questions or concerns.**
- ✓ **Follow the internal controls that apply to your area.**
- ✓ **Promptly report Code, policy or procedure violations to appropriate management, Global Compliance & Ethics or the Integrity Line.**



2. My Commitment to Coworkers

2.1 Inclusion

2.2 Non-Discrimination

2.3 Freedom from Harassment

2.4 Health and Safety

Why It Matters

As a global company, we work side by side with people from many nations and cultures. We respect the varied viewpoints of others. We recognize that despite our differences, we are guided by a common set of Harsco values and are united by our integrity.

2.1

Inclusion

Our diverse work force is a source of pride. We value our differences and welcome the unique contributions, perspectives and ideas of every employee. Wherever we do business, we work together in a spirit

of collaboration, respect and inclusion, and know that many perspectives can produce the best solutions.



2.2

Non-Discrimination

We are an equal opportunity employer. Our policies prohibit unlawful discrimination. All employment-related matters (e.g. hiring, promotion) are based on an individual's performance and job qualifications.

Harsco operates in many countries, each with its own laws, requirements and restrictions. The best way to comply with the law – regardless of your location – is to keep all of your interactions professional and respectful.

What If...?

Q. My supervisor seems to ignore me when I ask for more responsibilities, and I feel it may be because of my race.

A. If you feel you are being discriminated against, we need to investigate the matter. Report it to one of our many resources – such as Human Resources, Global Compliance & Ethics or our Integrity Line. Managers who receive reports will escalate them appropriately.

Learn More:

[Equal Employment Opportunity and Affirmative Action Policy](#)

2.3

Freedom from Harassment

We also believe that individuals should be able to work in an environment free of harassment, bullying and abusive conduct. Our policies prohibit any unwelcome conduct – whether physical, verbal or visual – that creates an offensive, hostile or intimidating environment.

We do not tolerate harassment, whether sexual or non-sexual in nature, and whether committed by a Harsco employee or someone else with whom we do business. If you see or experience harassment, report it to [Human Resources](#), [Global Compliance & Ethics](#) or our [Integrity Line](#) immediately.



Learn More:

[Policy Against Discriminatory Harassment](#)



You Should Know

Harassment can take many forms, including but not limited to:

- Spreading malicious rumors or insults about someone
- Telling jokes that are offensive or obscene
- Belittling or ridiculing someone for their beliefs, opinions, background or appearance
- Unwelcome touching or asking for sexual favors
- Threatening violence, harm or revenge

What If...?

Q. One of my supervisors has repeatedly asked me out on a date. I have said no and that I am not interested. Now when he sees me he winks at me and makes me very uncomfortable.

A. You are entitled to a workplace where you feel valued and respected, and free from harassment. Report this behavior to Human Resources, Global Compliance & Ethics or our Integrity Line.

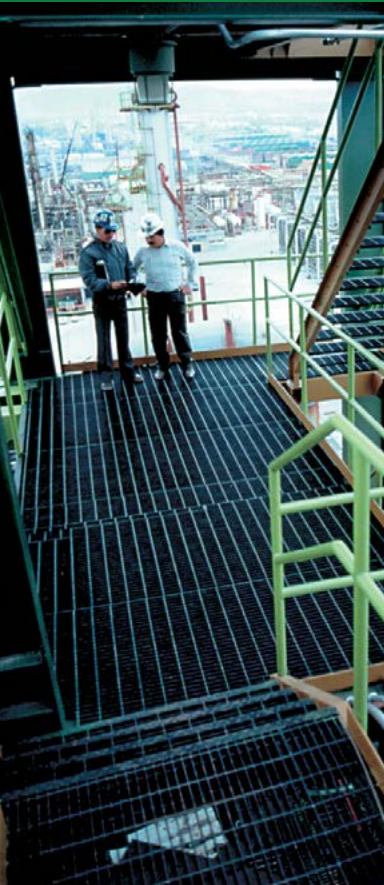
Q. In a recent meeting, a supplier began reading jokes from his cell phone that degraded a certain religious group. I found the jokes offensive but everyone else in the meeting was laughing.

A. We do not tolerate this kind of disrespectful conduct from Harsco employees or any Harsco business partner, including our suppliers. Report the incident to Global Compliance & Ethics or our Integrity Line.



2.4

Health and Safety



We promote safe work practices and take steps to eliminate injuries. The work we do carries risks, but all injuries are preventable. Comply with Harsco's health and safety policies and always follow the safety procedures and standards that apply to your job. Take precautions, for yourself and your coworkers, to prevent accidents. Our Zero Harm commitment and our Environmental Health and Safety (EH&S) Framework provide a clear path to identify and eliminate risks from our daily work.

In all of our workplaces, behavior by any individual that involves the threat of violence or damage to property is strictly prohibited. Immediately report any threatening incident to a manager.



Learn More:

[Harsco Employee Safety Commitments](#)



It's My Job

- ✓ **Make safety your first priority – never compromise safety in order to meet a business goal.**
- ✓ **Report any potential hazard, accident or injury immediately.**
- ✓ **Cooperate with all risk analyses, audits and accident and injury investigations conducted by Harsco.**
- ✓ **Don't attempt any task for which you are not properly trained.**
- ✓ **Always do things the safest way – even if there is an easier or faster way.**
- ✓ **Watch out for the safety and welfare of coworkers and urge them to immediately address unnecessary risks.**

Fitness for duty is a basic requirement for everyone who works for Harsco. All Harsco workplaces have a strict policy against the use of alcohol, illegal drugs, or improper or unsafe use of any drug or medication that could impair your ability to do your job. This is to protect your safety and that of your coworkers.

We reserve the right to test employees for drug and alcohol use when consistent with applicable law.



Learn More:

[Drug and Alcohol policies](#)



What If...?

Q. One of my coworkers sometimes smells of alcohol and acts strangely at work. He may be drinking on the job and I am concerned.

A. Employees who drink on the job – or before coming to the job – put everyone in danger. If you suspect that someone is unfit for duty, immediately report it to your supervisor, EH&S, Human Resources, Global Compliance & Ethics or our Integrity Line.

Q. I noticed someone performing a task in an unsafe way, but the person involved works in another department.

A. We are all responsible for a safe work environment – regardless of the job we do. Immediately report your concerns to your supervisor or another resource. Taking action could help prevent an accident or injury. Always take the opportunity to speak with a coworker directly if you believe his or her safety is at risk.

Q. A coworker injured himself on the job and doesn't want to report it.

A. Tell your coworker that all injuries, no matter how small, must be reported. Immediately reporting the incident helps us to ensure that your coworker receives necessary medical attention and helps our company address possible future hazards. An unreported minor injury for one person may result in a major injury to someone else simply because it was not reported, investigated and the root cause eliminated.



3. My Commitment to the Company

- 3.1** Confidential Information
- 3.2** Intellectual Property
- 3.3** Company Assets
- 3.4** Business Records
- 3.5** External Communications
- 3.6** Social Media
- 3.7** Conflicts of Interest
- 3.8** Gifts and Entertainment

Why It Matters

We work together to protect the company. This means protecting what we can see and touch, such as our buildings, equipment and other physical assets. We also protect ideas, strategies and processes. We keep our assets safe from theft, damage, waste, abuse and misuse.

3.1

Confidential Information

Confidential information includes information about our Company or our customers, competitors, suppliers or even former employers. We keep it to ourselves because it includes specialized knowledge about our business practices, sales activities, production and manufacturing processes and financial standing.

Confidential information also includes private, personal or business data that employees, customers, prospects, suppliers and business partners share with us. They trust us to collect, store, use and share personal data and confidential business data responsibly. We honor that trust by gathering, using and disclosing this information only when needed to do our jobs.

Be especially careful with personally identifiable information (PII) that can be traced to a person's identity. As a company,

we have an obligation to collect, store, process and transfer personal data in accordance with applicable data protection laws and regulations. Safeguard the PII that is entrusted to us. We do not release personal information except as permitted by applicable law.

If you handle PII as part of your job, share it only with those who are authorized and need it for legitimate business purposes. Limit the amount of information you share to what is required to accomplish the task.



You Should Know

PII could pertain to a coworker or anyone we deal with in our work and includes such information as:

- Medical records
- Compensation and benefit data
- Banking information
- Tax records



It's My Job

- ✓ **Collect and store confidential information in a secure manner.**
- ✓ **Disclose confidential information only to those who are authorized to receive it.**
- ✓ **Never discuss confidential information in public places where your conversation may be overheard or paperwork can be seen.**
- ✓ **Never share confidential information on social media or send it on non-secure networks.**
- ✓ **Protect confidential information from theft and improper use by providing the appropriate safeguards, including locked or protected storage.**

What If...?

Q. I used to work for one of our biggest competitors, and I think Harsco could benefit from knowing some of the specialized engineering knowledge from my former employer.

A. Just as you must protect Harsco's confidential information, you are obligated to protect confidential information from a previous employer. You should keep this knowledge to yourself.

Q. A supervisor from another department asked me for the personal email addresses and work start dates of several coworkers. She said it is for personal reasons.

A. We respect employee privacy and only share employee information when it is required for a legitimate business purpose. This example does not meet our standard. Tell the supervisor you are not allowed to disclose the information.



3.2

Intellectual Property

Intellectual property (IP) is in some ways even more valuable than physical property. Our intellectual property includes patents, trademarks, copyrights, designs, inventions and trade secrets. It represents the specialized knowledge and teamwork of many people and many years of work. Our IP is one of the critical elements that give us a competitive advantage in the marketplace. Be aware that any work or inventions you create during your employment at Harsco belong to Harsco.



Learn More:

[Unsolicited Ideas Policy](#)



It's My Job

- ✓ **Protect our Intellectual Property (IP).**
- ✓ **Respect the IP of other companies. Don't share it with anyone without permission.**
- ✓ **Share IP only with those who need it for a business reason.**
- ✓ **If you leave Harsco, don't share our IP with anyone.**



You Should Know

IP includes:

- Pricing plans, forecasts and sales figures
- Detailed product information
- Marketing, sales and distribution strategies
- Supplier and customer lists
- Manufacturing methods and techniques



What If...?

Q. A supplier told me about a new manufacturing process that is being researched by one of our competitors. He said plans are still secret but the discovery may affect our industry in a big way.

A. We respect the trade secrets of any third parties, which includes our competitors. Tell the supplier that you are not interested, and that sharing confidential information such as this is unacceptable. Report the incident to our Legal department.

3.3

Company Assets



Anything we use to do our jobs is a company asset. Physical assets include the places where we work, the property, equipment and supplies we use and the company vehicles we operate. We share a responsibility to protect our assets. Use our physical assets only for the purposes for which they are intended, and report any suspected theft, damage, misuse or abuse.

Physical assets also include our electronic devices such as computers, laptops, cell phones and mobile devices. It is important to maintain the safe use and security of these devices, as well as the systems, networks and software that we use to store, retrieve and transmit information and communications. Safeguard our technology from theft and unauthorized use. If you take electronic devices with you to a job site or other remote location, keep them in your possession at all times.

It's My Job

To take responsibility for protecting our electronic assets...

- ✓ **Never let anyone borrow, use or access the Company's electronic devices without permission.**
- ✓ **Never install or download unauthorized software applications onto any Company device.**
- ✓ **Never access our network through an unauthorized network or device.**
- ✓ **Never share your passwords.**

Learn More:

[Electronic Communications Policies](#)

It's My Job

- ✓ **Care for Company assets as if they were your own.**
- ✓ **Use our assets for Harsco-related business only.**
- ✓ **Never lend, sell or give assets away unless authorized to do so.**
- ✓ **Understand that anything you create, store, send, share or download on our systems belongs to Harsco and that we may monitor systems without notifying you, to the extent permitted by law.**
- ✓ **Never use Harsco computers or systems to send, receive, view or download unlawful, offensive, discriminatory or threatening content; to harass anyone; or to reveal confidential information.**



You Should Know

Occasional, reasonable personal use of Company assets, such as telephones, are permitted as long as:

- The cost to Harsco is insignificant.
- It doesn't interfere with your work or the work of others.
- It is not for purposes of personal gain for you or your family members.



What If...?

Q. While operating some equipment I accidentally made a small dent on a component, but it is barely visible.

A. Each of us has a responsibility to take care of our assets and report any damages, regardless of how small. Promptly tell your supervisor what happened.

Q. I would like to borrow a Harsco vehicle to move some large items at home over the weekend. The vehicle is not needed by anyone until Monday.

A. Our assets are meant for business purposes. You may not borrow them for your personal use without prior written consent of your manager.

3.4

Business Records



Our books and records are a reflection of our financial position and are the basis upon which we make important business decisions. Accurate recordkeeping is key to maintaining the successful operation of our business, while also maintaining the trust of our stakeholders and compliance with the law and our policies. These obligations require that we be timely, accurate and complete, and never falsify, mislead or guess when entering data into our books and records.

If you are involved in preparing disclosure documents for regulatory filings, make sure you are familiar with what's required and never misrepresent or omit material facts. Always comply with applicable legal requirements and generally accepted accounting principles as well as the Harsco internal and financial controls, policies and procedures we have in place.

Manage, store, retain and dispose of records in compliance with our records retention policies and the law.



Learn More:

[Internal Control Framework Policy](#) and [Records Retention Policy](#)



What If...?

Q.

I want to record a sales transaction for the current quarter even though the contract will not be finalized until the next quarter.

A.

Entries made to our books and records must be timely. You should not record a sale until the agreement is complete.

Q.

I accidentally entered the wrong amount on an expense report.

A.

We all make mistakes. Be proactive, advise your supervisor of the error and take the necessary steps, as directed, to ensure our books and records are accurate.

It's My Job

- ✓ **Follow our internal controls and provide all supporting documentation, where required.**
- ✓ **Record transactions in the proper account, department and accounting period.**
- ✓ **Accurately document all supplier and third-party contracts.**
- ✓ **Cooperate with internal and external audits. Never dispose of information that may be relevant to an audit, an investigation or litigation.**
- ✓ **Immediately report any inaccuracy or suspected act of financial misconduct.**

What If...?

Q. There is a file cabinet in my department filled with some old tax records. I would like to empty the cabinet to make room for new files.

A. Check our records retention policy to see if the documents may be disposed of. Also check to make sure the documents are not subject to a legal hold and relevant to a lawsuit, investigation or audit.

You Should Know

The term, “books and records” includes:

- Invoices
- Purchase orders
- Expense reports
- Payroll records
- Time cards
- Benefit claims
- Safety and quality reports

3.5

External Communications

We take care when communicating about Harsco. In order to ensure that accurate, timely and complete information about our business is communicated to the investing public, regulatory authorities and others, we have designated individuals to serve as our official Company spokespersons.

That means, if you receive an information request from the media, you should not respond unless you are authorized to speak on behalf of Harsco. Refer all media inquiries to the [Corporate Communications department](#). Refer

all questions from the investment community, such as analysts and financial advisors, to the [Investor Relations department](#).

If you receive an inquiry from a government official or agency, promptly contact the [Legal department](#). Do not provide information to any government representative before obtaining permission to do so. If you are questioned as part of an investigation or audit, cooperate fully and provide truthful, accurate and complete information.

3.6

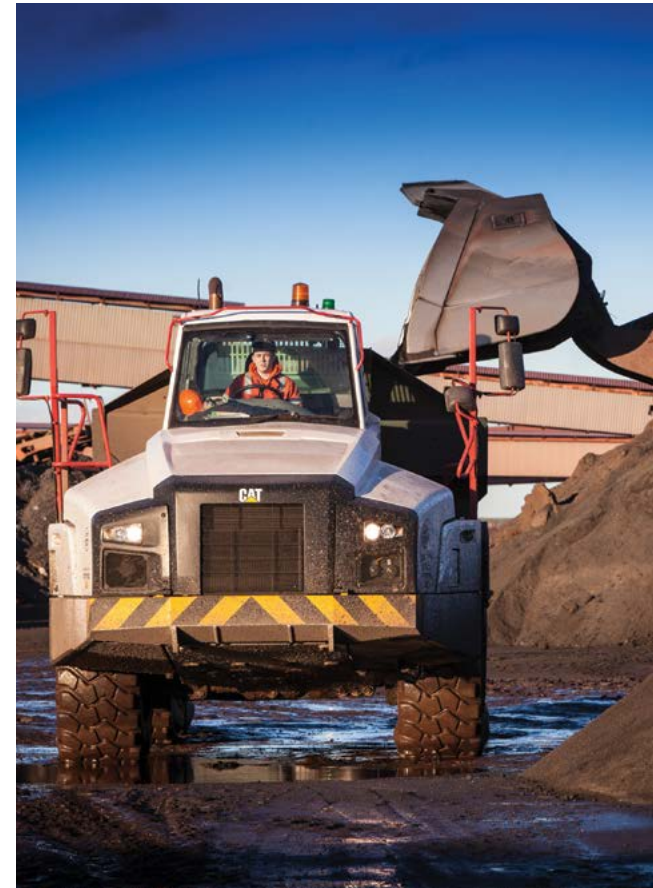
Social Media

The advent of online social media introduces new ways for us to engage and inform, but carries with it the same responsibilities for integrity, transparency and mature judgment that we require in all of our activities. It is Harsco's policy to engage in and encourage the use of social media for appropriate, business-related purposes. These business-related purposes, along with other relevant guidelines related to social media, including participation in personal social media, are described in our [Social Media Policy](#). If social media is an approved part of your job, you will be informed in writing by your supervisor or department manager, and Corporate Communications.



Learn More:

[Social Media Policy](#)



What If...?

Q. A coworker often communicates strong opinions about government officials and current legislative issues on a social networking site, some of which might impact Harsco.

A. Your colleague is free to express her personal political views on social media as long as she does not disclose confidential business information and she makes it clear that her views are her own and not those of Harsco.

Q. An official of a local government agency contacts me and asks for some financial records.

A. Verify the identity of the official as to name, title and the agency represented and immediately contact the Legal department. If you are directed by Harsco to provide the requested information, cooperate fully.

It's My Job

- ✓ **Engage in social media on behalf of the company only if social media is an approved part of your job.**
- ✓ **Never post material that is obscene, defamatory, profane, libelous, threatening, harassing, abusive, hateful or embarrassing to another person or entity.**
- ✓ **Never disparage our customers, vendors, business partners or competitors on social media.**
- ✓ **Contact our Corporate Communications department if you discover a social media post that relates to the business of Harsco; misrepresents our business, services or products; or is potentially damaging to Harsco's business, reputation or public image.**

3.7

Conflicts of Interest

We must never let personal interests or relationships interfere with business decisions we make on behalf of Harsco. A conflict of interest happens when what you do (or what your family members or close friends do) outside of Harsco interferes with the job you do as an employee of Harsco. While it's not possible to list every situation that could present a conflict,

there are certain instances where conflicts typically arise. You have an obligation to recognize these situations and avoid even the appearance of a conflict. If and when they do arise, you have a responsibility to disclose them. If you have questions about the right thing to do in any situation, [speak up](#).



Learn More:

[Conflict of Interest Policy](#)



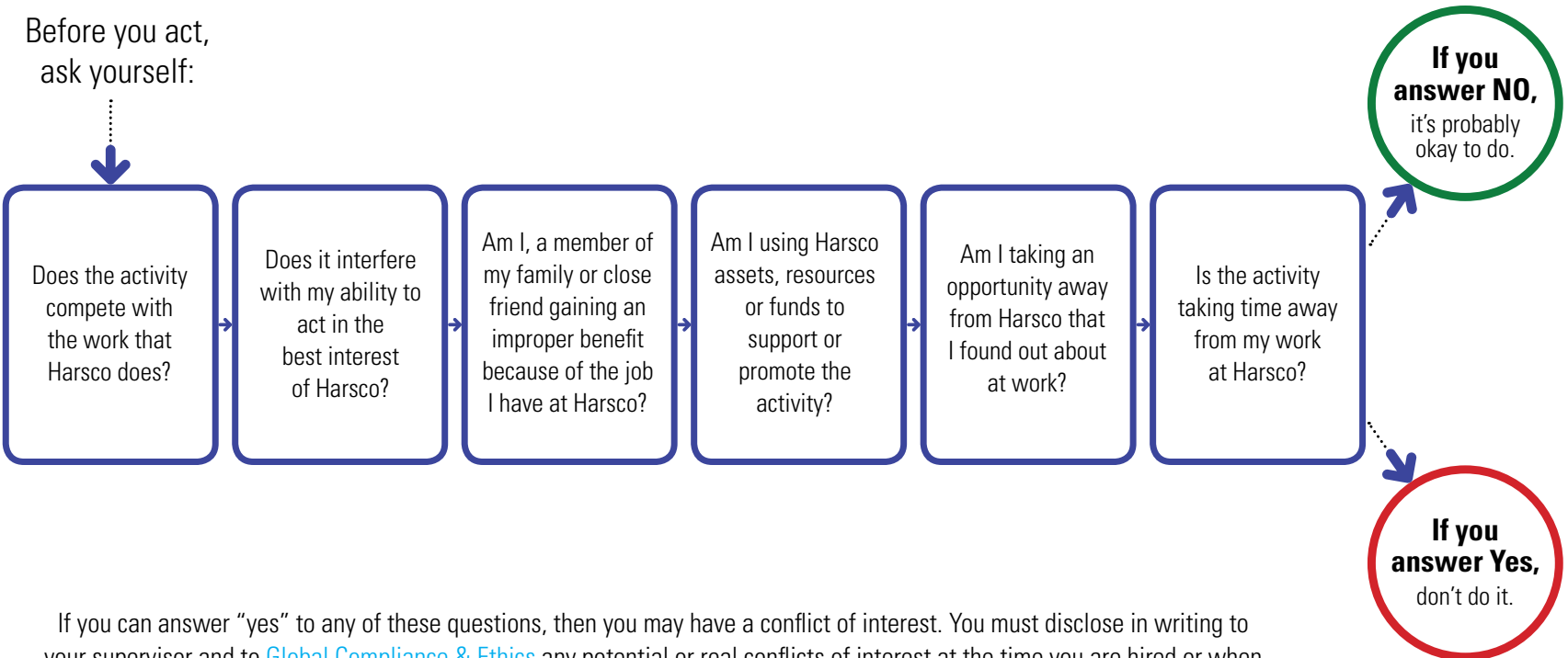
You Should Know

Conflicts of interest may occur when you:

- Hire, supervise or report to a relative or someone with whom you have a romantic relationship.
- Do business or influence Harsco's decision to do business with a company that is owned by or controlled by you or a relative, friend, etc.
- Work for, provide services to or receive personal benefits from a company that competes, does business with or wants to do business with Harsco.
- Own or invest in a company that does business with Harsco, unless your ownership is in a publicly held corporation and your interest is less than one percent.
- Take a business opportunity for yourself or for a relative that is meant for Harsco.
- Serve on the board of directors for a company if the decisions you make for them affect decisions you make for Harsco.
- Accept a second job (if allowed by local law or employment contract) if it affects the time, talent or energy you bring to Harsco.
- Use Harsco assets of any kind for your own personal or political purposes.



Do What Is Right



If you can answer “yes” to any of these questions, then you may have a conflict of interest. You must disclose in writing to your supervisor and to [Global Compliance & Ethics](#) any potential or real conflicts of interest at the time you are hired or when a potential conflict arises. Business partners doing business on behalf of Harsco are required to disclose in writing to their Harsco contact any potential or real conflicts of interest upon employment or when a potential conflict arises.

What If...?

Q. I am reviewing bids from several potential subcontractors and one of the bidders is a company owned by a close relative.

A. Although it is possible for you to be unbiased in your review, your involvement may be perceived as a conflict of interest. Let your supervisor know and remove yourself from the bidding review process.

Q. My daughter is looking for work and I think she would be an ideal candidate for an open position in my department.

A. As long as you are not involved in the hiring process, and do not try to use your relationship to improperly influence an employment decision, it is fine to let your daughter apply for work at Harsco through our normal application channels. It would be appropriate to disclose your relationship and, if your daughter is hired, she should not be placed in a position where either of you would supervise the other's work.

Q. A Harsco competitor asked if I would provide consulting services for them. I would not be their employee, but would work for them as an independent contractor on certain projects.

A. Working for a business that offers products or services that directly compete with Harsco creates a conflict of interest. In addition, it may open the door to the exchange of confidential business information. You should decline the offer.



3.8

Gifts and Entertainment

It is common to exchange business gifts or other courtesies to express goodwill. However, we don't use special favors or gifts to persuade someone to make a business decision or give us special treatment. And we don't offer or accept business courtesies hoping to receive anything in return or to encourage anyone to do business with us. Follow our policies and be sure that any expenditures are authorized and documented.



Learn More:

[Travel and Entertainment Expense Policy](#)



You Should Know

In general, you may:

- Pay for meals and refreshments for others in connection with business discussions.
- Provide reasonable entertainment and modest hospitality.
- Accept meals and refreshments from others in connection with business discussions.
- Accept offers of reasonable entertainment and modest hospitality.
- Accept business gifts which aren't lavish or extravagant.
- Not offer or accept cash or its equivalent in any form, no matter how small the amount.
- Not offer or accept anything of value if it could be perceived as a bribe.



What If...?

Q. A prospective supplier wants to meet me at his headquarters in another city and has offered to pay for my travel and a weekend stay in a hotel for me and my family.

A. We conduct business honestly and fairly. Accepting the supplier's offer would not only violate our policies, but send a message to others that we make decisions about business partners based on factors other than quality, price and performance. Always follow our policies and think about how your actions might appear to an objective observer. You should decline the offer.

Q. One of our subcontractors always offers us tickets to big sporting events when he visits our facility.

A. If the subcontractor attends the event with you and the tickets are modest in price and offered infrequently, it's possible that accepting the tickets might be permitted. However, the words "always offers" and "big sporting events" suggest something otherwise. Check our policies and ask your supervisor for written permission in advance to determine whether this offer is acceptable. If you still have a question, you should contact Global Compliance & Ethics.

Q. A potential supplier promises to give me a portion of his commission if Harsco accepts the company's bid.

A. This offer is a form of bribery. Let the supplier know that you cannot accept the offer and that this is not the way Harsco does business. It violates our Code and may even be illegal. Report the incident to Global Compliance & Ethics or our Legal department.





4. My Commitment to Customers, Suppliers and Other Third Parties

- 4.1 Sales and Marketing Activities
- 4.2 Responsible Contracting
- 4.3 Supplier Relationships
- 4.4 Engaging Third Parties

Why It Matters

Trust can't be bought or sold, only earned. For more than 160 years, people have put their trust in us and in our services and products. They count on us to be fair and honest and to deliver what we say we're going to deliver. Every day, every person in every Harsco location is responsible for maintaining that trust.

4.1

Sales and Marketing Activities

Satisfying our customers is our number-one job. Because we are “United by Integrity,” every employee – even those whose job responsibilities don’t involve customer contact – should be mindful that the work each of us is doing and the decisions each of us is making have an impact on our customers.

We are honest about our products, services and capabilities and never make promises that we know we can’t keep. Our honesty carries over to our marketing, advertising and promotions – we never take unfair advantage by misrepresenting or concealing the facts. We strive to provide customers with the information they need to make an informed decision, and to always be truthful and accurate in our communications.

What If...?

Q. I overheard one of my coworkers talking to a customer on the phone about features and functionality that our product doesn’t have.

It’s My Job

- ✓ **Provide fair and balanced information.**
- ✓ **Never market our products or services in a misleading way.**
- ✓ **Make sure our claims are backed up by solid facts.**
- ✓ **Make sure that any written or visual representations accurately reflect the products we offer.**

A. Any time our products or services are marketed in a misleading way, we are violating our high standards and may be violating the law. Point out your concerns to your coworker. If the behavior continues, report it to your supervisor or the Integrity Line.

4.2

Responsible Contracting

As a Company that wins much of its business through formal bid and contract processes, we understand that honesty, transparency and accountability are important, not only in winning – but also in retaining – contract accounts. These principles apply equally to our commercial contracts as well as contracts with government-related agencies.

If your work involves bid and contract preparation or management, make sure you comply with all applicable procurement laws and regulations and our policies. Do not participate in any activity that could be perceived as a kickback, bribe or effort to improperly influence a contract outcome.

We understand that the requirements under government-related contracts can sometimes be much stricter than those governing general commercial

contracts, so we must be careful to comply with all relevant statutory, regulatory and contractual provisions and avoid even the appearance of anything improper. Comply with our policies and local laws and seek guidance from [Global Compliance & Ethics](#) before offering anything of value – including a gift, a meal or an offer of entertainment – to a government official.

What If...?

Q. We are currently under contract with an agency that is under government jurisdiction in our region. A government representative is coming to visit our facility and we would like to treat him to a nice dinner with our team.

A. There are very strict rules when it comes to providing meals – or anything of value – to a government official. Check our Anti-Corruption Policy before making plans or extending an offer. If you're still not sure of what is permitted – and what isn't – speak with your supervisor or Global Compliance & Ethics.



Learn More:

[Anti-Corruption Policy](#)

It's My Job

- ✓ Be accurate, truthful and complete in preparing bids and proposals for contracts.
- ✓ Comply with all specifications, terms and conditions of our contracts.
- ✓ Create clear, correct invoices reflecting actual charges for work.
- ✓ Cooperate with authorized inspections, investigations and audits.
- ✓ Protect confidential information and property.
- ✓ Be mindful of any particular requirements applicable to government-related contracts.



4.3

Supplier Relationships



We work to ensure our dealings with suppliers are fair, open and transparent. We select suppliers based on their ability to provide the best value to Harsco, evaluating them on the basis of cost, quality, delivery, service, administration and reputation.

We do business only with suppliers that comply with local and other applicable legal requirements and Harsco guidelines relating to labor, the environment, health and safety. In addition, we expect our suppliers to abide by the same ethical and legal standards applicable to Harsco employees, such as conflicts of interest, confidentiality, anti-bribery and antitrust, among others.

Suppliers should be furnished with a copy of our Code of Conduct and encouraged to comply with its applicable provisions.

What If...?

Q. A prospective supplier has quoted a very low price and fast delivery, but requires that we bypass a stated requirement in the contracting process.

A. Tell the supplier that all prospective suppliers must follow our processes and meet our requirements. If you feel you are being pressured to do something improper, report it to your supervisor, Global Compliance & Ethics or the Integrity Line.

Q. I suspect one of our suppliers of violating wage and hour requirements.

A. Speak up. If you suspect unfair labor practices, report your concerns to your supervisor, Global Compliance & Ethics, our Legal department, Human Resources or the Integrity Line. We expect our suppliers to meet the same high standards that we expect of ourselves.

4.4

Engaging Third Parties

We are careful in choosing sales representatives, consultants and others to work on our behalf. Make sure prospective “third-party” business partners are reputable, qualified and able to meet our requirements. As such, we have stringent policies that require thorough due diligence on any third party prior to engagement. You should also provide third parties with a copy of our Code and hold them accountable to our high standards.

 **What If...?**

Q. We work with an agent whose company is suspected of paying off government officials to complete required inspection paperwork.

A. Harsco prohibits this kind of conduct. Report what you know to Global Compliance & Ethics or our Legal department so we can investigate the matter.

Q. A customer contacted me to complain about a Harsco supplier who is constantly offering to take her to sporting events, concerts and dinner outings. The customer has never accepted the offers but is wondering if this is appropriate.

A. If this supplier is trying to influence the customer’s decision to continue to do business with us, it may be an attempt at bribery. Because Harsco may be liable for the conduct of our agents, this is a serious matter. Report it to Global Compliance & Ethics or our Integrity Line.

Q. A coworker on one of our projects says that a Harsco subcontractor uses child labor.

A. We prohibit child labor in any circumstance. Encourage your coworker to immediately report this to his or her manager or our Integrity Line.

**Learn More:**

[Anti-Corruption Policy](#)
[Due Diligence Policy](#) and
[Consultants, Business Advisors and International Representatives Policy](#)





5. My Commitment to the Marketplace

- 5.1 Anti-Bribery
- 5.2 Anti-Money Laundering
- 5.3 Anti-Fraud
- 5.4 International Trade
- 5.5 Insider Trading
- 5.6 Antitrust
- 5.7 Fair Dealing

Why It Matters

Compliance with applicable laws and regulations doesn't just ensure that we meet our legal obligations – it ensures that we are permitted to continue to support the safe, reliable delivery of Harsco products and services throughout the global marketplace.

5.1

Anti-Bribery

We win and retain business fairly. We understand that bribery and corruption create unfair competition, give rise to inferior products and, ultimately, weaken the global marketplace. We therefore follow the laws and regulatory requirements in the countries where we do business.

Never offer or accept anything of value to influence a business decision or to gain an improper advantage. Be aware that a bribe can be something other than cash: a gift, a favor, a job, even a charitable contribution can be considered bribes if they are offered to influence a decision on our behalf. Regardless of local practice or the practices of other companies, make sure you avoid even the appearance of anything improper.

In addition to our own acts, we are responsible for the acts of those who conduct business for us, and we can be liable for any bribes they offer on our behalf. That is why it is critical that we know who we are working with, the business practices they employ and the reputation they have for operating honestly and ethically.



Learn More:

[Anti-Corruption Policy](#)



It's My Job

- ✓ **Never offer or accept a bribe.**
- ✓ **Never allow anyone to offer or accept a bribe on behalf of Harsco.**
- ✓ **Be accurate and complete when recording all transactions in our books and records.**
- ✓ **Report any actual or suspected acts of bribery.**



You Should Know

Harsco prohibits “facilitation payments,” which are:

- Small payments
- Demanded by low-level foreign government officials to perform routine functions such as inspecting goods or securing shipping permits
- Permitted in some countries but can be serious violations in others

If you are asked to make a payment such as this, no matter how small, discuss the matter with Global Compliance & Ethics in advance.



What If...?

Q.

A supplier who wants to do business with us told us that he can help us speed up our shipments because he often “slips a little something extra” to a local government official to get things done.

A.

Tell the supplier that this is not the way Harsco conducts business. You should report the incident to your supervisor, Global Compliance & Ethics or the Integrity Line.

Q.

A long-time trusted supplier offers a commission in exchange for securing an annual contract for his company.

A.

In this instance, a “commission” for doing business is another word for a kickback or a bribe, both of which are unethical and potentially illegal. Advise the supplier that you are not permitted to accept the commission and report the incident to your supervisor, Global Compliance & Ethics or the Integrity Line.

Q.

A contracted sales agent offers to split her commission with me if Harsco extends her contract.

A.

This is a kickback scheme. Reject the offer and report the incident to your supervisor, Global Compliance & Ethics or the Integrity Line.

Q.

A local government official said he would approve and certify our required facility inspections ahead of schedule if we give him a small amount of money.

A.

This kind of payment he is requesting is typically called a facilitation payment and is not permitted by our Company. Do not pay it. Report the incident to Global Compliance & Ethics or our Integrity Line.

5.2

Anti-Money Laundering

We never knowingly conduct business with individuals involved in money laundering, in which funds generated through criminal activity are moved through legitimate businesses to hide their criminal origin.



You Should Know

Be aware of transactions that involve:

- Large cash payments
- Fund transfers between countries where the customer or supplier does not do business
- Requests to make a payment from or to a source that is not associated with the customer's or supplier's business



What If...?

Q.

A prospective customer whose company is based in one country asks if payment can be made to us from a different company that is based in another country.

A.

This sounds suspicious. Report what you know about the prospective customer to the Legal department. Know your customers and partners, understand their use of our products and services and be alert for any financial transactions that may suggest anything illegal.

Q.

A customer requested that we begin sending invoices to a private individual rather than his accounting department.

A.

This is an unusual request. Report what you know to the Legal department.

5.3

Anti-Fraud

As individuals, we recognize that our Company trusts us to do the right thing. We protect Company assets and work to prevent fraud. We don't tolerate cheating, stealing or misrepresentation, and we never deceive others, directly or indirectly, for personal or financial gain. We each play a part in protecting Harsco's business from any dishonest activity.



You Should Know

Some activities where there is a higher risk of fraudulent activity include:

- Processing of cash disbursements
- Receiving cash
- Payroll processing
- Maintaining check stocks



What If...?

Q.

I heard a coworker bragging about adding some personal expenses to his Company expense report.

A.

Each of us has a responsibility to be fair, honest and accurate. Encourage your coworker to do the right thing and correct the expense report. If you suspect that the behavior is continuing, report your concerns to your supervisor, Global Compliance & Ethics or the Integrity Line.



5.4

International Trade



As a U.S.-based company doing business all over the world, we understand the importance of complying with laws and regulations that relate to imports, exports, customs and other trade compliance issues. If you are involved in the movement of products, services, information or technology across international borders, comply not only with U.S. laws, but also with the trade laws and regulations associated with the countries in which you do business.

We don't conduct business with sanctioned countries or restricted parties, and lists of prohibited shipments and products can change frequently. As an employee, you aren't expected to be an expert in this area, but you are expected to consult with those who *are* experts for help. Seek help from the [Legal department](#) or [Global Compliance & Ethics](#).

We also don't participate in any boycott that is not approved by the U.S. Government. If you receive a request to comply with a foreign boycott (or a request to supply boycott-related information), seek guidance from the Legal department.



It's My Job

- ✓ **Make sure that anything intended for import or export is properly classified in advance.**
- ✓ **Be aware that the laws of more than one country may apply in cross-border transactions.**
- ✓ **Communicate our trade compliance policies to third parties who do business on our behalf.**
- ✓ **When in doubt about requirements, ask.**

 **What If...?**

Q. A customer has asked if I can modify our shipping process so that a shipment won't have to pass through a particular country.

A. This kind of request suggests an attempt to bypass our processes and procedures. Follow our policies to ensure compliance with the law. If you feel pressured to do otherwise, discuss it with the Legal department.

Q. I need to expedite processing of several purchase orders and don't have time to manually screen every customer against our lists of prohibited shipments and products.

A. You must not skip this step. Each customer and supplier must be systematically checked against the relevant government lists of entities prohibited from engaging in business according to Harsco's due diligence policy.



5.5

Insider Trading



In our work we may have access to material, non-public (“inside”) information about our Company – information that a reasonable investor would consider important in making a decision to buy, sell or hold our stock. We may also work with inside information about our suppliers, our business partners and our customers. We are obligated to protect this information. Never trade on inside information or tip off others so that they may trade.

Some employees (“Designated Employees”) of the Company are subject to higher restrictions and should only trade with pre-approval during approved periods. If you have any questions about whether or not you can trade our stock, contact the [Legal department](#).

**Learn More:**

[Insider Trading Policy](#)

**You Should Know**

Examples of inside information:

- Estimates of future earnings or profits
- Awards or cancellations of major contracts
- Planned mergers or acquisitions
- Changes in executive management
- Lawsuits or legal activities



What If...?

Q. There is a press release on a subcontractor's website announcing that it is merging with a larger, public company.

A. Because this information has already been publicly released, it is not considered material, non-public information. You may trade based on this information.

Q. I found out that we have a pending deal with a large, major customer. I'm fairly sure it will go through. My mom wants to know how Harsco is doing and it would be nice to at least reveal the customer's name.

A. You cannot share what you know because it is material, non-public information. If she uses it for a stock trade, or tells someone else who makes a stock trade, you and she would be violating our policy and the law.

Q. A supplier told me his company is preparing to introduce a new product that could be very profitable. It has not been publicized yet, but I would like to buy stock based on what I know.

A. The supplier has revealed what appears to be material, non-public information that could influence an investment decision. Even though the information is about a company other than Harsco, it would be illegal for you to trade based on the information.



5.6

Antitrust

We compete fairly and comply with laws that promote competition and free trade. Never engage in any activities that may limit competition, and don't enter into any agreement – whether formal or informal – with a competitor, customer or supplier that would restrict trade or exclude others from competing. If you find yourself in a situation where a competitor starts discussing such matters, stop the conversation immediately and report the incident to the [Legal department](#).

 **What If...?**

Q. At a recent trade conference, one of our competitors pulls me aside and asks me what our bid price was on a recent proposal. I told him that was confidential, and walked away.

A. You did the right thing. Discussing anything related to prices or billing with a competitor, even in a casual situation, would be a violation of our policy and the law. Immediately report the incident to the Legal department.

**You Should Know**

Talking with a competitor? These topics are off-limits:

- Pricing, costs or terms or conditions of sale
- Manipulating bids in a competitive bidding process
- Dividing markets, territories, products or customers
- Restricting production, sales or output
- Preventing others from entering the market
- Refusing to work with a client or supplier

5.7

Fair Dealing

We treat our business partners fairly. Gathering information about competitors is a standard practice in any industry. However, we are committed to doing it legally and ethically. Market research, product evaluation and review of public documents are all acceptable methods for obtaining information; fraud, misrepresentation and deception are not. Never ask for a competitor's confidential information from current or former employees or from any third-party partners, customers or suppliers. If you receive competitor information that you believe to be confidential or obtained through improper means, report it to the [Legal department](#).



It's My Job

- ✓ **Gather competitive information legally and ethically.**
- ✓ **Keep confidential information – ours and our competitors' – confidential.**
- ✓ **Make sure that third parties acting on our behalf live up to our standards.**



6. My Commitment to Communities

- 6.1 Civic, Charitable and Political Activities
- 6.2 Human Rights
- 6.3 Environmental Protection

Why It Matters

Serving and supporting the communities where we live and work is an important expression of our values. We strive to be a good neighbor and a model company by giving our time, talent and energy to making the world a better place.

6.1

Civic, Charitable and Political Activities

We encourage you to volunteer your contributions of time, talent and money to support causes that are important to you. This includes political candidates and campaigns where applicable. Take care, however, never to use Harsco funds, assets, resources, time or the Harsco name to support your activities. Make it clear that your personal views and actions do not represent those of the Company.



You Should Know

- Occasionally, Harsco may communicate about political issues that could affect our business.
- Lobbying activities on behalf of Harsco must first be approved by the Harsco General Counsel.
- Harsco never tells employees how to vote.

6.2

Human Rights



We believe every human being has the right to safe, healthy working conditions and to be treated with dignity and respect.

We expect suppliers throughout our global supply chain to share our commitment to the same high standards.

We are also committed to the responsible sourcing of conflict minerals. We comply with laws that require disclosure of their use, and we encourage our suppliers to adopt similar policies and systems.



Learn More:

[Conflict Minerals Policy](#)



You Should Know

We prohibit:

- Child labor
- Forced labor
- Physical punishment or abuse
- Slavery
- Human trafficking



6.3

Environmental Protection

We are committed to preserving the earth's natural resources. We protect the quality of our air and water and minimize the environmental impact on the communities where we operate. Your business decisions should always incorporate sound environmental practices. Whenever possible, choose environmentally safe and sustainable energy sources and do your part to preserve natural resources. Treat and dispose of hazardous and nonhazardous waste in an environmentally responsible manner.

 What If...?

Q. There is an unusual discharge with an unpleasant odor coming from a pipe on a project site.

A. Raise your concern with your supervisor. If you are not satisfied with the answer, report the issue to Harsco Environmental Health and Safety.

 It's My Job

- ✓ **Comply with local environmental laws and regulations.**
- ✓ **Aim for continuous improvement in environmental performance.**
- ✓ **Cooperate with environmental audits to ensure we meet acceptable standards.**
- ✓ **Choose technologies, processes and treatment alternatives that reduce or eliminate facility wastes and emissions.**

Q. At my facility I have noticed that some electrical equipment is left running while not being used.

A. Discuss it with your supervisor. Raising the issue could lead to a solution that helps save financial as well as natural resources. You may also contact Harsco Environmental Health and Safety.

Resources

You may contact any of the following Resources for advice and help any time or consult the Policy References that follow. If you have trouble locating a policy or discover a broken link to an online policy, get help from a manager or supervisor or contact your local HR representative so they can provide the policy to you.

Resource:	For help with:	Contact:
Harsco Integrity Line	Any Code of Conduct issue	Any member of Global Compliance & Ethics (GC&E) Phone: http://info.harsco.com/Lists/HarscoHotLine/AllItems.aspx Email: harscointegrityline@tnwinc.com Web: http://compliance.harsco.com/
Harsco Global Compliance & Ethics	Any Code of Conduct issue or question in reference to Company policies, Values and business ethics	Any member of Global Compliance & Ethics (GC&E) Email: compliance@harsco.com Web: http://info.harsco.com/Compliance/Pages/Home.aspx
Harsco Corporate Legal department	Any Code of Conduct issue, including questions about laws and inquiries from any government official and approval of lobbying activities	Your regional Office of General Counsel (OGC) resource or divisional counsel Email: legaldepartment@harsco.com
Harsco Corporate Communications department	Questions from the media	The Corporate Communications Department Email: corporatecommunications@harsco.com
Harsco Environmental Health and Safety (EH&S)	Health, safety, security and workplace violence	Vice President, Global Environmental, Health, Safety (EH&S) & Security Department. Contact information can be found in the Harsco Global Address book online or from your supervisor. Web: http://info.harsco.com/Safety/Pages/Home.aspx
Harsco Investor Relations department	Questions from the investment community	Director of Investor Relations Email: ir@harsco.com Web: http://investors.harsco.com/phoenix.zhtml?c=108575&p=irol-irhome
Harsco Internal Audit	Questions about internal controls	Any member of the Internal Audit department. Department contact information can be found in the Harsco Global Address book online or from your supervisor.
Harsco Human Resources	Questions about employment, benefits, pay, workplace behaviors and performance and HR policies, and Company Values	Your local Human Resources representative. Names can be accessed via the Harsco Global Address book online or from your supervisor. Web: http://info.harsco.com/Human_Resources/Pages/Home.aspx

Policy References

The following is an alphabetical list of policies referenced in the Code. For a full list of policies, check the Company intranet or contact your local HR representative.

[Anti-Corruption Policy](#)

[Anti-Retaliation Policy](#)

[Consultants, Business Advisors and International Representatives Policy](#)

[Conflict of Interest Policy](#)

[Conflict Minerals Policy](#)

[Drug and Alcohol policies](#)

[Due Diligence Policy](#)

[Electronic Communications Policies](#)

[Equal Employment Opportunity and Affirmative Action Policy](#)

[Harsco Employee Safety Commitments](#)

[Insider Trading Policy](#)

[Internal Control Framework Policy](#)

[Policy Against Discriminatory Harassment](#)

[Records Retention Policy](#)

[Social Media Policy](#)

[Travel and Entertainment Expense Policy](#)

[Unsolicited Ideas Policy](#)

Glossary

This Glossary defines some of the basic concepts and terms used in our Code.

Abuse. To treat something badly, use it improperly or inappropriately, or to take advantage of that use in a way that can cause injury or damage. Cruel or violent verbal or physical treatment of an individual.

Bribery. Offering, promising, giving or receiving anything of value to gain an improper advantage or favorable business decision.

Child labor. Work done by young children that interferes with their health, education or general well-being, or where young children are exploited or their work involves criminal or dangerous activity.

Company assets. Anything our Company uses to conduct business, including equipment, supplies, vehicles, furnishings, computer systems, software, phones and

wired and wireless devices. Also includes information, trade secrets and personnel.

Conflict of interest. A situation of divided loyalty, where an individual's personal interests interfere with the business interests of the Company.

Discrimination. Unfair or unequal treatment of a person or group based on characteristics protected by law.

Electronic assets. Digital files, information, databases, software, accounts and passwords, and the devices, tools and equipment used to store, send, receive and retrieve them.

Facilitation payment. A small payment made to a government official or a representative of a government agency in order to advance a routine action or service.

Fraud. Falsifying, lying or misrepresenting the facts in order to obtain an unfair advantage.

Gift. Anything of value, including cash, tickets, travel and lodging.

Government official. An employee or appointee of a government or government-controlled company, organization, agency or committee. May also include employees or representatives of a political party, political candidates and employees and members of international organizations that represent governments.

Harassment. Unwelcome physical, verbal or visual conduct that is based on a person's protected status.

Glossary

Human trafficking. Recruiting, harboring, transferring or receiving individuals by force, fraud or abduction for an improper purpose such as forced labor or sexual exploitation.

Insider trading. Buying, selling or holding securities – or tipping others to do so – based on material nonpublic information.

Intellectual property. Knowledge, ideas, discoveries, formulas, inventions and other intangible assets that have commercial value and are protected under copyright, patent, service mark and trademark laws.

International trade. The exchange of capital, goods and services between two or more countries or territories.

Management. Leaders, managers, supervisors and others who have some level of authority.

Material nonpublic information.

Information that has not yet been disclosed to the public that would be reasonably expected to influence an investor’s decision to buy, sell or hold the securities of a company.

Money laundering. The process by which criminals disguise the original source and control of funds acquired through criminal conduct, by making the funds appear to have come from a legitimate source.

Personnel. People employed by the Company or working for us.

Social media. Online communications channels that provide an opportunity for content sharing, individual input of information and interaction – includes websites, chat rooms, blogs, news feeds, social networking sites and special applications dedicated to posting and sharing comments, articles, opinions, ideas, information and images.

Supplier. Any person, representative of a company or company that sells or intends to sell a product or service to the Company – includes consultants, contractors and agents.

Third party. A buyer, seller, agent or other individual or company that is involved in a transaction, contract or business deal and is not an employee, director or officer of our Company.

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