



Non-Discrimination and Anti-Harassment Policy

This policy applies to all employees of NewMarket Corporation and its subsidiaries.

I. PURPOSE

NewMarket is committed to providing and maintaining a work environment that is free of unlawful discrimination, harassment and retaliation and that fosters respect for all employees, customers, suppliers and contractors. In keeping with this commitment, the Company will not tolerate discrimination or harassment on the basis of an individual's race, color, sex, sexual orientation, gender identity, national origin, religion, age, disability, genetic information, status as a military veteran or any other characteristic protected by applicable law. Anyone found to be engaging in any type of unlawful discrimination, harassment or retaliation will be subject to disciplinary action up to and including termination of employment.

II. POLICY

The basic employment policy of NewMarket Corporation and all of its subsidiary operations is as follows:

- A. Our employment practices will conform with the Company's Code of Conduct and Our Values as well as to both the letter and the spirit of applicable federal, state and local laws and regulations prohibiting unlawful discrimination, harassment and retaliation in the workplace.
- B. There shall be no discrimination or harassment with regard to an individual's race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, genetic information, status as a military veteran or any other characteristic protected by applicable law in any matters relating to the terms or conditions of an individual's employment including, but not limited to, recruiting, hiring, placement, promotions, demotions, transfers, layoff or termination, rates of pay or other forms of compensation, use of facilities and selection for training and Company- sponsored programs.
- C. The Company firmly supports equal employment opportunity and maintains a program of affirmative action to promote this activity. The affirmative action program calls for positive and affirmative action to ensure that minority group individuals, females, disabled veterans, recently separated veterans, other protected veterans, Armed Forces service medal veterans and qualified disabled persons are introduced into our workforce and considered for promotional opportunities.
- D. NewMarket has designated the Human Resources Manager to be responsible for the maintenance of the Company's Equal Employment Opportunity programs. Such responsibilities include, but are not limited to, establishing and implementing Affirmative Action Plans and related systems for monitoring and auditing the Company's Equal Opportunity practices.



Policy and Procedures

It is the obligation of every employee of NewMarket Corporation and its subsidiaries to adhere to this policy.

III. UNLAWFUL DISCRIMINATION AND HARASSMENT, AS WELL AS INAPPROPRIATE AND/OR UNPROFESSIONAL CONDUCT, IS STRICTLY PROHIBITED

NewMarket prohibits unlawful discrimination and harassment of any kind in the workplace. Additionally, any inappropriate and/or unprofessional conduct will not be tolerated. Examples of prohibited discrimination, harassment and inappropriate and/or unprofessional conduct includes, but is not limited to, derogatory remarks or slurs, circulation of written materials, jokes, cartoons, pictures, e-mail messages, text messages or computer transmissions, and certain gestures that demean, ridicule or torment an individual because of her/her personal characteristics or beliefs. Additionally, unlawful discrimination and harassment, as well as inappropriate and/or unprofessional conduct, includes discriminatory or harassing intimidation, insult, ridicule or comments where the conduct:

- Has the purpose or effect of creating an intimidating, hostile or offensive work environment;
- Has the purpose or effect of unreasonably interfering with an individual's work performance;
- Adversely affects an individual's employment opportunities; or
- Is deemed not to be in the best interests of NewMarket or its subsidiaries.

The Company will not tolerate unlawful discrimination or harassment, or any inappropriate and/or unprofessional conduct, that affects an individual's tangible job benefits, interferes with an individual's job performance, or that creates an intimidating, hostile or offensive work environment for employees, visitors or anyone conducting business with the Company.

IV. SEXUAL HARASSMENT IS STRICTLY PROHIBITED

Sexual harassment is one specific type of harassment that is prohibited. Unwelcome or unwanted sexual advances, requests for sexual favors, and other physical, verbal or visual conduct, when based on sex, constitutes sexual harassment. It is sexual harassment when:

- Submission to the conduct is an explicit or implicit term or condition of employment;
- Submission to or rejection of the conduct is used as the basis for an employment decision; or
- The conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive



working environment.

Sexual harassment may include sexual propositions, sexual innuendoes, suggestive comments, excessive flattery, questioning of a personal nature, repeated requests for dates, sexually-oriented practical jokes, teasing or “kidding,” jokes about gender-specific traits, offensive or obscene language or gestures, leering or staring, whistling or hooting, offensive or obscene printed materials, pictures, posters, cartoons, graffiti, calendars, e-mail messages, text messages, other electronic communications or computer transmissions, and inappropriate physical contact or touching of a sexual nature (e.g., brushing, patting, hugging, pinching or shoulder rubs).

V. RESPONSIBILITIES

All employees, consultants and other individuals employed by or associated with the Company are responsible for maintaining a workplace free of unlawful discrimination, harassment and retaliation as well as any inappropriate and/or unprofessional conduct. Any person may file a discrimination or harassment complaint regarding any incident experienced personally or observed in the workplace. It is the responsibility of all personnel to bring complaints to the Company’s attention. Never assume that the Company is aware of prohibited or inappropriate conduct that you may have experienced or witnessed.

Any individual found to have violated this policy shall be subjected to appropriate disciplinary action up to and including termination of employment. If you believe you have been the subject of conduct prohibited by this policy, or have witnessed conduct prohibited by this policy, you should notify the Company immediately using the Complaint Procedure described below.

VI. COMPLAINT PROCEDURE

Any employee who is the victim of unlawful discrimination or harassment, or who witnesses what he or she believes to be unlawful discrimination or harassment, should use the following procedure.

If you believe you are being discriminated against or subjected to unlawful harassment, or you believe you have witnessed such behavior, and you are comfortable speaking to the offending employee, you are encouraged to speak to that individual about his/her offensive conduct and explain that you do not like it. The offensive conduct may have been thoughtless or based on a mistaken belief that it was welcome. In any event, respond immediately; do not ignore the problem.

If you believe you have been discriminated against or subjected to unlawful harassment, or have witnessed such behavior and you are uncomfortable approaching the offender, or have done so without success, or if you simply want the Company to know, you should report such facts immediately to your supervisor so that the Company can take appropriate action.

If for any reason you are uncomfortable approaching your supervisor (for example, if your supervisor is the person you feel is engaging in unlawful discrimination or harassment), or you feel that the matter is not being adequately addressed, you should bring the matter to the attention of the next level of management or to Human Resources as soon as possible.



Policy and Procedures

It is important to inform the Company immediately if you experience or observe unlawful discrimination or harassment. Nothing can be done to remedy the problem if the Company does not know it exists. If a complaint is made, the Company will conduct an investigation and take appropriate action. Confidentiality will be maintained to the extent possible without jeopardizing a full investigation.

Employees should also use this procedure with regard to any work-related harassment or discrimination by non-employees, such as customers or vendors. The Company cannot always control the conduct of all non-employees, but will do its best to remedy any such situations that arise.

The Company prohibits retaliation against any individual who, in good faith, makes a complaint under this policy or participates in an investigation under this policy. Retaliation is itself a violation of this policy and should be reported in the same manner as a complaint of unlawful discrimination or harassment. Any attempt to coerce, intimidate or retaliate against anyone who in good faith complains of a violation of this policy or who in good faith participates in an investigation under this policy will not be tolerated.

If it is determined that a violation of this policy has occurred, prompt and appropriate action will be taken, which may result in discipline of the person engaging in the prohibited conduct up to and including termination of employment.