



Chemours™

Financial Conflicts of Interest Policy

1. INTRODUCTION

This Financial Conflict of Interest (“COI”) Policy (the “Policy”) outlines the steps that the Chemours Company (“Chemours” or the “Company”) will take to identify and mitigate any potential, actual, or perceived financial or organizational conflicts of interest related to projects for which financial assistance funding is sought or received from the U.S. Department of Energy (“DOE” or the “Agency”), including the requirements of the DOE Interim COI Policy.

2. DEFINITIONS

Financial conflict of interest or financial COI means a situation in which an Investigator or the Investigator’s spouse or dependent children has a significant financial interest or financial relationship that could directly and significantly affect the design, conduct, reporting or funding of a project for which financial assistance funding is sought or received from the DOE.

Investigator means the principal Investigator (PI) and any other person, regardless of title or position, who is responsible for the purpose, design, conduct, or reporting of a project funded by DOE or proposed for funding by DOE.¹

Organizational conflict of interest or organizational COI means a situation where because of relationships with a parent company, affiliate, or subsidiary organization, Chemours is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization.²

Significant financial interest will be defined in the project-specific conflicts of interest policy (the “Procedure”).

3. SCOPE

This Policy applies to all Chemours employees working on or supporting projects for which financial assistance funding is sought or received from the DOE.³

4. POLICY STATEMENTS

Chemours is committed to developing and enforcing an administrative process within the Company to identify and manage potential, perceived, or actual financial and organizational COIs arising from or related to projects for which financial assistance funding is sought or received from the DOE. Given that each project will be unique,

¹ DOE program offices have the discretion to expand the definition to include also any person who participates in the purpose, design, conduct, or reporting of a project funded by DOE or proposed for funding by DOE. Such expansion will be specified in the applicable funding opportunity announcement and/or terms and conditions of the financial assistance award. Any such expansion will be applied to Chemours projects as appropriate.

² 2 C.F.R. § 200.318(c)(2).

³ The Company’s Financial COI Policy does not apply to Office of Indian Energy and Phase 1 Small Business Innovation Research (“SBIR”)/Small Business Technology Transfer (“STTR”) funding opportunity announcements and financial assistance awards, which are specifically exempted from DOE’s Interim COI Policy. See U.S. Dep’t of Eng. Interim Policy at pdf 1; *id.* at Appx. 1, § II.

the business seeking and administering the project is responsible for developing the Procedure required to effectuate this Policy. In compliance with DOE's Interim COI Policy, each Procedure is required to, at a minimum:

- Provide an administrative process to identify, manage, resolve, and report (if applicable) any potential, perceived, or actual financial COI or organizational COI.
- Ensure that any subrecipient working on a DOE project administered by Chemours understands and abides by this Policy and the related Procedure for that project.
- Establish training programs to educate employees on how to prevent, identify and report any financial or organizational COIs that may violate this Policy.
- Provide an enforcement mechanism that affords for appropriate discipline for violations of this Policy or any underlying Procedure, up to, and including, termination.
- Ensure Investigators meet all requirements to disclose any Significant Financial Interests to ensure any perceived, possible, or actual financial COIs are identified, managed, resolved and/or reported (as required).

Chemours will adopt each Procedure within 20 business days of the Company receiving notification of selection of a proposed project for award negotiations under a DOE financial assistance program (and in any event prior to the execution of a DOE funding agreement).

Chemours will also provide training to its Ethics & Compliance team and other relevant stakeholders regarding this Policy and DOE requirements related to financial and organizational COIs.