

W. R. Grace & Co. Policy and Organization Guide

Policy Name: Political Contributions	Policy Number: 510
Issued By: Government Relations Group	Date Last Reviewed: September 2021

PURPOSE:

This policy is to advise that political contributions will not be made by the Company or its subsidiaries, either directly or indirectly, except where lawful and where such contributions have been approved by Grace's Senior Vice President, Public Affairs and EHS.

SCOPE:

All Officers and employees of W. R. Grace & Co. and its subsidiaries to the extent outlined in Policy No. 504.

STATEMENT OF POLICY:

The following activities are prohibited unless specifically authorized in writing by the Senior Vice President, Public Affairs and EHS: (1) the use, directly or indirectly, of any funds or other assets of the Company or any subsidiary for political contributions of any kind or in any form (whether cash, other property, services, the furnishing of facilities, or anything else of value given to influence an election); (2) the establishment or administration of any committee or other organization for the raising or making of political contributions; or (3) the making or financing by the Company or any subsidiary of media advertisements or other electioneering communications that are aired within a few months prior to an election and that identify a candidate for office.

PROCEDURES AND IMPLEMENTATION:

1. All requests for approval of a political contribution and questions regarding this policy should be sent to the Senior Vice President, Public Affairs and EHS.
2. The definition of a "candidate" is not limited to those who have formally declared as candidates. Virtually all incumbents are considered "candidates" whether or not they are declared candidates.
3. The definition of an "election" is not limited to a general election. Among other matters, the term includes a special, primary, or runoff election, a convention or caucus of a political party, a primary election held to select delegates to nominate candidates for election.