

Afton Chemical Corporation EHS³ and Responsible Care[®] Policy

In support of our Vision and Values and corporate goals, Afton Chemical Corporation will conduct all operations in a manner that protects our employees, the community and the environment.

We will comply with all laws and regulations concerning environmental protection, health, safety (including process safety), security, and stewardship (EHS³), which affect our operations. We are also committed to the principles of preventing pollution, conserving energy, minimizing waste, using sustainable resources, and minimizing our impact on the environment. In addition, as a member of the American Chemistry Council, we are committed to fulfilling the Responsible Care[®] requirements, including the Guiding Principles, designed to improve the performance of our industry in the area of EHS³. Further, we will maintain a system to continually determine what laws, regulations, and other requirements to which we may subscribe or be subject. We will cooperate with governments and organizations in the development of these. Through consultation and employee participation, we will work to eliminate hazards and reduce risk.

Every employee at Afton Chemical Corporation is responsible for ensuring that the company's high standards in the area of EHS³ are upheld at all times. The senior management of Afton Chemical Corporation will ensure that this policy, any changes to it, and all relevant legal requirements are effectively communicated to employees and other interested parties.

In keeping with Afton Chemical Corporation's overarching "vision of zero" EHS³ incidents, we will work with our employees and other interested parties to establish appropriate goals, objectives and targets in order to periodically evaluate our EHS³ performance. Results from these evaluations will be used to take corrective actions as required. We will achieve continual improvement in the area of EHS³ performance through the establishment of an effective Responsible Care[®] RC14001 management system.

We will promote a spirit of openness with interested parties, including partners in our supply chain, so that hazards and risks associated with our products, processes and operations are available to them. We will address concerns of interested parties promptly and seriously.

With a view to ensuring the continued relevance of this policy to the nature, scale and impact of our company's operations, products, and processes, we will review this policy annually and whenever a significant change is considered.

Signed

A handwritten signature in black ink that reads "Regina Harm".

Regina Harm, President

March 17, 2020, Rev-7