QUAKER CHEMICAL CORPORATION

POLICY RELATING TO CONFIDENTIALITY OF INFORMATION AND INSIDER TRADING IN SECURITIES

April 2016

Quaker Chemical Corporation ("Quaker" or the "Company") has adopted the following Policy relating to trading in Quaker securities consistent with the legal and ethical responsibilities that we have as a result of Quaker's status as a public company. The Policy applies to all associates (including directors and officers) of Quaker Chemical Corporation and its subsidiaries with the exception of Section 2 which <u>currently</u> applies only to (i) the Management Executive Committee ("MEC") members, (ii) each associate who has been informed by an e-mail from Robert T. Traub (or his successor as General Counsel) that he or she is subject to Section 2 of the Policy (each a "Section 2 Restricted Associate"), and (iii) Quaker's directors. Each associate who becomes a Section 2 Restricted Associate shall continue to have the status of a Section 2 Restricted Associate (and be obligated to comply with the provisions of Section 2 of this Policy) until he or she has been informed by a subsequent e-mail from Robert T. Traub (or his successor as General Counsel) that he or she is no longer subject to Section 2 of this Policy. We reserve the right at any time to expand the application of Section 2 to any individual associate, group of associates, or all associates.

1. **Prohibition Against Trading on Undisclosed Material Information:** If you are aware of material information relating to Quaker which has not yet been made available to the public (often called "inside information"), you are prohibited from trading in Quaker's securities, directly or indirectly, and from disclosing such information to any other persons who may trade in Quaker's securities. As used in this Section 1, the phrase "trading in Quaker's securities" means any acquisition or disposition of Quaker securities including, without limitation, any increase or decrease of your investment in the Quaker Stock Fund offered as one of the investment options in Quaker's 401(k) plan. Any information, positive or negative, is "material" if it might be of significance to an investor in determining whether to purchase, sell or hold Quaker's securities. Information may be significant for this purpose even if it would not alone determine the investor's decision. Examples include, but are not limited to, a potential business acquisition, internal information about revenues, earnings or other aspects of our financial performance which departs in any way from market expectation based upon prior disclosures, or an important transaction or development. We emphasize that this list is merely illustrative.

Once material information is announced, trading can occur after a lapse of two full trading days. Therefore, if an announcement is made before the commencement of trading on a Monday, an associate may trade in Quaker stock starting on the Wednesday of that week, because two full trading days would have elapsed by then (all of Monday and Tuesday). If the announcement is made on Monday after trading begins, associates may not trade in Quaker stock until Thursday. Please consult Robert T. Traub (or his successor as General Counsel) if you are uncertain when trading may commence following an announcement.

The prohibition against trading on inside information described above generally reflects the requirements of law as well as our Policy. As more fully discussed below, a breach of this Policy could constitute a serious legal violation.

2. Restricted Periods: In addition to the prohibition described in Section 1, which is applicable only when you are aware of material insider information, MEC members, Section 2 Restricted Associates and Quaker's directors are prohibited from trading in any securities of Quaker during a "restricted period." A "restricted period" begins on the first day of the last month of each calendar quarter (i.e., on each March 1, June 1, September 1 and December 1) and continues through the second full trading day following Quaker's public announcement by press release of our results of operations for the calendar quarter during which the restricted period commenced.

Caution: Please note that the prohibitions in Section 1 and this Section 2 apply independently. Accordingly, the prohibition in Section 1 relating to material insider information is applicable even during periods when trading is permitted by this Section 2, and the prohibition in this Section 2 is applicable to all MEC members, Section 2 Restricted Associates and Quaker directors, notwithstanding the fact that they may not be in possession of material insider information.

3. Notification by MEC Members: Each MEC member must inform the CEO and Assistant Corporate Secretary of their intent to buy or sell Quaker securities, including the exercise of options, before executing the transaction. Each executive should be mindful of the Quaker Stock Ownership Policy and guidelines and ensure they continue to meet their ownership requirements following any transaction.

4. Confidentiality of Information: Serious problems could be caused for Quaker by the unauthorized disclosure of internal information about the Company (or confidential information about our customers or vendors), whether or not it is for the purpose of facilitating improper trading in Quaker stock. The Company's associates should not discuss the Company's internal matters or developments with anyone outside of the Company, except as required in the performance of regular corporate duties.

This prohibition applies specifically (but not exclusively) to inquiries about the Company which may be made by the financial press, investment analysts or others in the financial community. It is important that all of these communications be made only through an appropriately designated officer under carefully controlled circumstances. Unless you are expressly authorized to the contrary, if you receive any inquiries of this nature, you should decline comment and refer the inquiry to Mary Dean Hall or Robert T. Traub (or their respective successors as Chief Financial Officer and General Counsel).

5. **Information About Other Companies:** In the course of your employment, you may become aware of material non-public information about other public companies. For example, you may become aware of material non-public information about other companies with which we have business dealings. You are prohibited from trading in the securities of any other public company at a time when you are in possession of material non-public information about that company.

6. **Tipping:** Improper disclosure of non-public information to another person who trades in the stock (so–called "tipping") is also a serious legal offense by the tipper and a violation of the terms of this Policy. If you disclose information about Quaker, or information about any other public company which you acquire in connection with your employment with the Company, you may be fully responsible legally for the trading of the person receiving the information from you (your "tippee") and even persons who receive the information directly or indirectly from your tippee. Accordingly, in addition to your general obligations to maintain confidentiality of information obtained through your employment and to refrain from trading while in possession of such information, you must take utmost care not to discuss confidential or non-public information with family members, friends or others who might abuse the information by trading in securities.

7. **Prohibition on Wash Trading:** Section 9 of the Securities Exchange Act of 1934 expressly prohibits certain manipulative trading practices, including "wash" trades. A wash trade is an illegal form of stock manipulation in which an investor simultaneously sells and buys shares of stock not for a profit motive, but in order to artificially increase or manipulate trading volume and the stock price. You are prohibited from engaging in any such activity by law and this Policy.

8. **Limitation on Certain Trading Activities:** We encourage interested associates to own Quaker securities as a long-term investment at levels consistent with their individual financial circumstances and risk-bearing abilities (since ownership of any security entails risk). However, Company associates may not participate in hedging type activities in Quaker stock, including trading in puts, calls or similar options on Quaker stock or selling Quaker stock "short." (You may, of course, receive and exercise any stock options granted to you by Quaker.)

9. **Consequence of Violation:** The Company considers strict compliance with this Policy to be a matter of utmost importance. We would consider any violation of this Policy by an associate as a threat to our reputation. Your violation of this Policy could cause extreme embarrassment and possible legal liability to you and the Company. Knowing or willful violations of the letter or spirit of this Policy will be grounds for immediate dismissal. Violation of the Policy might expose the violator to severe criminal penalties as well as civil liability to any person injured by the violation. The monetary damages flowing from a violation could be three times the profit realized by the violator, as well as the attorney's fees of the persons injured.

10. **Resolving Doubts:** If you have any doubt as to your responsibilities under this Policy, seek clarification and guidance from Robert T. Traub (or his successor as General Counsel) before you act. Do not try to resolve uncertainties on your own.

11. A Caution About Possible Inability to Sell: Although the Company encourages associates to own Company securities as a long-term investment, all associates must recognize that trading in securities may be prohibited at a particular time because that time may fall within a "restricted period" (see Section 2) or because of the awareness of material non-public information (see Section 1). Anyone purchasing Quaker securities must consider the inherent risk that a sale of the securities could be prohibited at a time he or she might desire to sell them. The next opportunity to sell might not occur until after an extended period of time, during which the market price of the securities might decline.