

Statement Regarding California Transparency in Supply Chains Act

The California Transparency in Supply Chains Act of 2010 requires manufacturers that do business in California to disclose their efforts to eradicate slavery and human trafficking from their supply chains.

Occidental Chemical Corporation (OxyChem) seeks to build relationships with suppliers that are committed to compliance with OxyChem's policies relating to human rights and ethical business conduct. We expect—and our standard contracts require—suppliers to operate ethically and to comply with all contract terms, laws and OxyChem's policies.

While we believe the risk of slavery or human trafficking in our supply chain is low, we nonetheless have a variety of mechanisms in place to assess and reduce risks in our supply chain, including:

Verification

OxyChem has a number of policies and systems in place that help to ensure OxyChem's business practices are consistently effective and highly principled. Our Code of Business Conduct, which includes a section on Human Rights, delineates our commitment to promoting those rights universally recognized in international as well as national law, including freedom from forced or compulsory labor and child labor, and provides clear procedural guidelines that minimize the risk of human rights violations. OxyChem periodically verifies that the processes are in place

Expectations for Suppliers

OxyChem's standard purchasing terms require suppliers to comply with all applicable labor laws and with OxyChem's policies on health and safety. OxyChem operates under a Code of Business Conduct, and expects that its suppliers will abide by OxyChem's Supplier Code of Conduct, which requires compliance with OxyChem's policies regarding ethical conduct and human rights. In addition, with limited exceptions, all contracts concerning our activities in a foreign jurisdiction contain provisions relating to the observance of human rights. A separate certification of compliance with these contractual expectations currently is not required.

Employee Training

Human rights training is provided to all new OxyChem employees and periodically to managers and designated employees who receive Code of Business Conduct training, including those with supply chain responsibilities. OxyChem's human rights training reinforces our company-wide commitment to operate in accordance with those rights and freedoms that have been universally recognized in international as well as national law and that are described in the following guidelines and principles: Universal Declaration of Human Rights, United Nations Declaration on the Rights of Indigenous Peoples, United Nations Guiding Principles on Business and Human Rights, International Labour Organization Convention 169, International Labour Organization Declaration on Fundamental Principles and Rights at Work, and the Voluntary Principles on Security and Human Rights.

Supplier Audits

OxyChem's standard supplier contracts allow OxyChem to conduct internal and external compliance audits. We apply a risk-based approach to determine which suppliers are subject to audit by our internal procurement or audit resources. Human trafficking and slavery have not been expressly covered in the scope of supplier audits because we believe the commodity nature of OxyChem's business and its supply chain presents a low risk of these activities. However, we regularly evaluate our risk profile and adjust the audit requirements to reflect perceived changes in the level of risk.

Accountability

OxyChem's standard supplier agreements require our suppliers to commit that they will comply with applicable laws, including laws relating to human rights. A supplier's failure to comply with this provision would constitute a breach of contract and may be subject to appropriate remedies, including termination of the supplier relationship. Employees who fail to comply with OxyChem's Code of Business Conduct are subject to disciplinary action, up to and including termination of employment.