

## INTRODUCTION

Occidental Chemical Corporation, including its wholly-owned subsidiaries, (OxyChem) expects its suppliers to act ethically and follow all applicable laws, rules, and regulations and to conduct business in a manner that reflects the highest ethical standards. This Supplier Code of Conduct sets forth OxyChem's specific Ethics & Compliance expectations for its suppliers. OxyChem has zero tolerance for the disregard or circumvention of OxyChem policies or engaging in unethical dealings in connection with OxyChem's business.

## NO BRIBES OR KICKBACKS

Do not give, offer, or accept bribes of any kind, whether directly or indirectly through someone else. A bribe can be anything of value intended to wrongly influence another person – whether that other person is in the government or in the private sector. Kickbacks are also a form of bribery and are strictly prohibited. A kickback occurs when an individual receives anything of value in exchange for improper preferential treatment. "Anything of value" includes cash or cash equivalents (such as gift cards), gifts, hospitality, charitable contributions or donations, discounts on products or services, or other personal favors. OxyChem employees are strictly prohibited from receiving commissions in exchange for doing business with a supplier.

## GIFTS & HOSPITALITY

OxyChem requires the use of good judgment and moderation when giving or accepting gifts & hospitality in business settings. Gifts & hospitality can include meals, hotels, lodging, travel, and entertainment. All gifts & hospitality must have a legitimate business purpose, be given openly and transparently, and approved in accordance with OxyChem policy. OxyChem employees may not accept any gift or hospitality over \$150 without prior approval from the Legal Department. Gifts or hospitality given in exchange for an improper business advantage (such as sending work to a certain supplier) are considered bribes and are strictly prohibited. Additionally, gift cards are considered to be cash equivalents and OxyChem does not permit employees to accept gift cards from suppliers – regardless of the amount.

## NO SOLICITATION

OxyChem employees are prohibited from directly or indirectly soliciting gifts, entertainment, hospitality, or favors of ANY value from OxyChem's suppliers. This includes solicitation for a charity or fundraiser that benefits an OxyChem employee or an employee's relative.

## ACCOUNTING RECORDS & CONTROLS

OxyChem requires its suppliers to keep accurate and transparent records of expenses, payments, services or equipment provided, and other transactions in reasonable detail. OxyChem may audit suppliers or otherwise objectively verify that suppliers are in compliance with this Supplier Code of Conduct.

## HUMAN RIGHTS

OxyChem expects its suppliers to respect universally accepted human rights and related applicable laws. Do not rely on forced labor or underage labor in your operations and be mindful of red flags related to human trafficking. OxyChem expects its suppliers to maintain robust policies and procedures designed to prevent human rights violations. OxyChem suppliers are also expected to treat their workers with dignity and respect and to comply with all applicable employment and workplace safety laws.

## SUBCONTRACTORS & DUE DILIGENCE

If a supplier uses subcontractors, OxyChem expects its suppliers will conduct proper due diligence to ensure the subcontractors are qualified to conduct business in the relevant location. OxyChem suppliers are expected to have a robust risk-based system of internal controls for authorizing payments to subcontractors and to prevent and detect violations of law. OxyChem also expects its suppliers' subcontractors to be reputable, obey all applicable laws, and respect human rights.

## HEALTH, ENVIRONMENT & SAFETY

Protecting the health and safety of OxyChem's employees and contractors and protecting the environment are among OxyChem's highest priorities. These objectives are considered in every aspect of OxyChem's operations, and OxyChem expects its suppliers to comply with applicable laws, regulations, policies and procedures regarding health, safety, process risk management, and environmental protection. While on OxyChem's premises, all suppliers must abide by all applicable safety regulations and OxyChem's safety procedures and practices, take necessary precautions to protect themselves, their co-workers, and all other persons on the premises, and immediately report accidents and unsafe practices or conditions to OxyChem.

As a proud member of the American Chemistry Council, OxyChem adheres to the Responsible Care® Guiding Principles and expects our suppliers to adhere to these same principles, as well as internationally recognized environmental, social, and corporate governance standards. The Responsible Care® Guiding Principles drive member companies to focus on improving the environmental, health, safety and security performance of facilities, processes and products throughout their life cycles. Suppliers are expected to accept these principles or develop similar programs to support their own operations.

## SUSTAINABILITY

OxyChem is committed to making a positive social impact – today and for future generations – through the safe development and sustainable manufacturing of indispensable chemicals that make modern life possible. Suppliers are expected to work with the highest integrity, in a culture of compliance and with respect for the communities where we live and operate, and implement programs aimed at reducing their environmental footprint. In addition, suppliers should implement procedures to track achievements in the reduction of greenhouse emissions, management of water use, improved energy efficiency and waste reduction.

## SPEAK UP WITH NO RETALIATION

OxyChem suppliers are expected to report suspected or actual violations of law, this Supplier Code of Conduct, our policies, or any other ethical concerns related to OxyChem employees, contractors, or other suppliers. Suppliers should contact their OxyChem business representative with any questions or to obtain more information about our expectations concerning ethical behavior.

Any concerns or misconduct noted by suppliers should be reported directly to the Ethics Hotline, available at <https://www.brk-hotline.com> or 1-800-261-8651 (U.S. and Canada). Reports can be made anonymously.

We prohibit retaliation against anyone raising concerns or reporting misconduct in good faith. OxyChem expects its suppliers to also prohibit retaliation. To read more about our values and Code of Business Conduct, visit our website: [www.oxychem.com](http://www.oxychem.com)