



Code of Business Conduct



Contents

A Message From Our CEO	2
Our Commitment to This Code, Ethics and Compliance	3
Speaking Up	4
How to Report a Concern or Ask a Compliance Question	4
Policy of No Retaliation	5
Handling of Reports and Investigations	5
Cooperation and Confidentiality	5
Compliance With Applicable Laws and Ethical Standards	7
Anti-Bribery and Anti-Corruption	7
Gifts and Hospitality	9
Political Contributions and Lobbying Activities	10
Trade Practices and Controls	11
Antitrust and Competition	12
Legal Review of Contractual Obligations	13
Workplace Requirements	14
Health, Safety and the Environment	14
Employment Practices	16
Business Integrity	19
Conflicts of Interest	19
Financial Reporting and Internal Controls	22
Protection of Property, Assets, Data and Information	24
Human Rights	28
Additional Resources	28
Questions and Doubts	29



A MESSAGE FROM OUR CEO

At OxyChem, we are proud of the strong foundation we have built together, and we remain committed to upholding ethics, safety, and compliance in every task, every day—strengthening the culture that sets OxyChem apart.

Our commitment is clear:

- We demand integrity and personal accountability at every level of the company.
- We uphold an unwavering commitment to safety and environmental stewardship.



As a leader in essential chemistry, we know our work has a lasting impact on everyday life. OxyChem's products are vital, supporting clean water, lifesaving medicines, healthcare, advanced manufacturing, automotive performance, personal hygiene, and the growth of communities worldwide. Our chemistry is foundational to modern society and critical to building a safer, healthier, and more sustainable future. Every day, our actions reflect our dedication to protecting our employees, earning the confidence of our customers, supporting our communities, and contributing to economic growth.

The Code of Business Conduct embodies OxyChem's core principles and our unwavering commitment to responsible business practices. Our standards often go beyond legal requirements, reflecting the excellence and safety record we uphold. This dedication safeguards our employees, earns the trust of our customers, and strengthens the confidence of the communities we serve.

It is the responsibility of every OxyChem employee and representative to read, understand, and follow the Code, and report any concerns. The Code guarantees that anyone who raises a concern in good faith will be protected from retaliation. Your vigilance and commitment are critical to maintaining the high standards that define OxyChem.

Thank you for your commitment to OxyChem's Code of Business Conduct. Together, we will uphold a culture of integrity and safety that drives our success and reinforces OxyChem's reputation as a trusted leader in essential chemistry.

Wade Alleman

OUR COMMITMENT TO THIS CODE, ETHICS AND COMPLIANCE

OxyChem maintains and promotes a culture of ethics and compliance, where every employee is committed to doing the right thing – even if staying true to our values may be unpopular, different from what others are doing, or more than what is legally required. Every OxyChem employee is accountable for complying with this Code and for conducting the company's business and operations with honesty and integrity.

This Code cannot address every situation that may arise. When confronted with a difficult situation, it is appropriate to ask:

- Is the action legal, ethical and socially responsible?
- Does the action comply with both the spirit and the letter of the Code?
- Will the action appear appropriate when reviewed later by others?
- Would OxyChem's reputation remain protected if the action became publicly known?

If any of these questions could be reasonably answered as "no," no action should be taken before obtaining guidance from the OxyChem Legal Team.

EVERY OXYCHEM EMPLOYEE IS REQUIRED TO:

- Read and understand this Code, as well as any related policies
- Demonstrate high standards of ethical business conduct
- Comply with this Code, even if it requires more than what the applicable laws require
- Complete all assigned ethics and compliance training and acknowledgements when due

OXYCHEM LEADERS HAVE ADDITIONAL RESPONSIBILITIES, AS THEY ARE REQUIRED TO:

- Maintain a work environment in which ethical behavior is expected and celebrated
- Ensure all direct reports complete the assigned training and acknowledgments when due
- Encourage discussion of questions and seek assistance if the answers are not clear
- Immediately report possible violations of this Code
- Take appropriate action when a violation has occurred

THIRD-PARTY REPRESENTATIVES

Third-party representatives, including advisors, agents, consultants, and distributors engaged to act on OxyChem's behalf, must comply with the Code in their work for OxyChem.

“Sometimes your associates will say, ‘**Everybody else is doing it.**’ Whenever I hear that, I cringe. This rationale is almost always a bad one if it is the main justification for a business action. It is totally unacceptable when evaluating a moral decision. Whenever somebody offers that phrase as a rationale, in effect they are saying that they can’t come up with a good reason. If anyone gives this explanation, tell them to try using it with a reporter or a judge and see how far it gets them.”

– Warren Buffett



SPEAKING UP

OxyChem expects all employees to report any actual or suspected violation of this Code. A concern should be reported so long as there is a good faith belief that there may be a problem. “Good faith” means believing that the information being provided is true. That does not require certainty that the information is correct or that all the facts are known and understood prior to reporting a concern.

Another way to speak up is to seek guidance on an ethics or compliance topic, as asking a question or seeking training can prevent a problem from arising.

Do not conduct a preliminary investigation, as that could compromise the integrity of the company’s investigation and its ultimate findings.

HOW TO REPORT A CONCERN OR ASK A COMPLIANCE QUESTION

OxyChem has established several channels to report a concern, including through:

1. **Supervisors/Managers:** Your supervisor, manager, department head or any member of management
2. **Human Resources:** Your Human Resources representative
3. **Legal Team:** Any member of the OxyChem Legal Team
4. **Navex Hotline:** The Navex hotline is also available for reporting ethics and compliance concerns; The hotline processes reports anonymously and confidentially, and is available in multiple languages, 24 hours per day/7 days per week

The Navex web-based system is available at: <https://www.brk-hotline.com>

The Navex phone number: **1-800-261-8651 (U.S. and Canada)**

All other countries, use: <https://www.brk-hotline.com>

When using the hotline, the reporter should provide as many details about the concern as available. Providing the date when an incident occurred, specific details about the event, and the names of witnesses and other people who may have relevant information, will allow for a more thorough investigation. Even if anonymous, a reporter may receive updates on the investigation and respond to questions by logging into the Navex system periodically.

POLICY OF NO RETALIATION

OxyChem strictly prohibits any retaliation against any person who, in good faith, asks a question, reports a concern, or assists an ethics and compliance investigation. All forms of retaliation are prohibited, including any form of discipline, reprisal, intimidation, or reputational attack. Any person who believes that they have been the subject of retaliation should report it immediately. Any employee who engages in retaliation in violation of this Code will be the subject of disciplinary action, up to and including termination of employment.

HANDLING OF REPORTS AND INVESTIGATIONS

OxyChem will review and respond to all questions and concerns raised in good faith through a designated reporting channel, including conducting a thorough investigation as appropriate under the circumstances. Corrective action will be taken if it is determined that the Code has been violated.

Any employee who violates this Code or other OxyChem policies, misuses a position of authority, refuses to cooperate with an investigation, knowingly makes a false complaint, or retaliates against someone for reporting or providing information about a concern, may be subject to disciplinary action, up to and including termination of employment.

COOPERATION AND CONFIDENTIALITY

Since allegations regarding misconduct can be very sensitive, investigations are conducted carefully and with discretion. For instance, if an employee is interviewed as part of an ethics investigation, they may be given few details about the concern being investigated or the source of the report.

Every employee asked to assist with an investigation is required to cooperate fully, answer truthfully, and, consistent with applicable law, keep their knowledge of the investigation confidential. Intentionally providing false information or interfering with an investigation is a serious violation of the Code that may be subject to disciplinary action, up to and including termination of employment.

In connection with an investigation, an employee may be required to make any computers, phones, or other electronic devices that are used for OxyChem business and operations available for inspection and imaging. Any review or imaging of such devices and their data will comply with applicable law.

The person who reported a concern will be provided with feedback upon completion of the investigation, although the details and factual findings may be kept confidential.

FAQs



Q: Last month I reported a concern about a co-worker. Since the investigation, the co-worker has stopped inviting me to meetings that I used to attend. Is this retaliation?

A: Retaliation is any adverse action taken as a result of an employee's involvement in an investigation. If you believe your co-worker has stopped inviting you to meetings because of the concern you reported, you should report this change in behavior. OxyChem prohibits all forms of retaliation.

Q: I submitted an anonymous concern through the Navex hotline reporting system. How do I find out how OxyChem responded?

A: When you submit a report through Navex, the system will provide a numeric code assigned to your report. You can use that code to check back on the status. Please save the code when provided, as it cannot be recovered if lost.

COMPLIANCE WITH APPLICABLE LAWS AND ETHICAL STANDARDS

OxyChem conducts its business and operations in accordance with applicable laws, rules and regulations, and in a manner that reflects the highest ethical standards. Every employee and third party who works for or represents OxyChem must understand the legal and ethical requirements and comply accordingly.

OxyChem's Prohibited Business Practices Policy provides additional guidance regarding OxyChem's commitment to compliance, including as to anti-bribery and anti-corruption, trade restrictions, and other legal and ethical parameters. That Policy is available [here](#).

In the event of any question or doubt as to whether an action is compliant, the matter must immediately be reported to the OxyChem Legal Team for further guidance.

A failure to comply with these requirements could result in substantial fines and penalties, as well as the erosion of the company's reputation with customers and other stakeholders who rely on OxyChem's products and services. An employee's failure to comply with legal and ethical requirements may be subject to disciplinary action, up to and including termination of employment.

ANTI-BRIBERY AND ANTI-CORRUPTION

OxyChem forbids corruption in all forms. Every employee and third party who works for or represents OxyChem must understand and comply with the U.S. Foreign Corrupt Practices Act (FCPA) and other applicable anti-bribery laws corresponding to where the company conducts business and operations.

Bribery occurs when cash or "anything of value" is promised, offered or paid in exchange for an improper business or operational advantage, such as improperly obtaining or retaining a business opportunity or influencing the conduct of a government official. *Such government officials may include employees of state-owned or state-controlled enterprises and their relatives.*

"Anything of value" can potentially become a bribe, including, as examples:

- Offer of employment or internship
- Cash or cash equivalents (gift cards)
- Charitable contributions or donations
- Discounts on products or services
- Gifts
- Hospitality
- In-kind contributions
- Personal favors
- Scholarships

Bribes or corrupt payments to government officials can be direct or indirect, such as through a third party working for or representing OxyChem. Accordingly, OxyChem prohibits corrupt promises, offers or payments made through third parties who work for, represent, or otherwise act on behalf of OxyChem.

“Facilitation Payments” are relatively small unofficial payments, usually to a government official, for the purpose of expediting or securing the performance of a routine government action. Making a cash payment to a customs official to expedite clearance of merchandise is an example of a Facilitation Payment. Facilitation Payments are prohibited, even if lawful in the country where offered.

Kickbacks are another form of bribery and are prohibited. A kickback occurs when an employee receives “anything of value” in exchange for improper preferential treatment to a vendor or third party.

Engaging in any form of bribery or corrupt activity, including Facilitation Payments and kickbacks, exposes OxyChem, as well as any individuals involved, to criminal and civil penalties under the laws of the U.S. and other countries.

FAQs



Q: From time to time, OxyChem enters into license agreements with foreign state-owned enterprises that are engaged in the manufacture of basic chemicals in their home countries. My department would like to invite employees from these licensees to the United States for a know-how conference. Do I need to obtain internal approvals for the conference?

A: Because these individuals work for a governmental entity, in accordance with the OxyChem Gift and Hospitality Policy, please obtain prior approval from the OxyChem Legal Team.

GIFTS AND HOSPITALITY

OxyChem employees must exercise good judgment and moderation when giving or accepting “gifts” or “hospitality” in business or operational settings. Every gift and hospitality must have a legitimate purpose and be reasonable and appropriate, given openly and transparently, and properly recorded in OxyChem’s books and records. A legitimate business or operational purpose can include advancing a professional relationship or expressing gratitude.



“Gifts” refer to any item or token of esteem or gratitude, and any entertainment without the attendance or participation of the giving party. For example, a gift would be a bottle of wine, gift card, or tickets to an event (without the giving party at the event). Gifts can also include personal favors or discounts. However, “gifts” do not include nominal promotional items, such as a low-cost pen, hat, or coffee mug.

“**Hospitality**” includes a meal or entertainment that is attended with a supplier, customer or other business or operational counterparty. It also includes travel or lodging that is offered to, or received from, a supplier, customer or other counterparty in connection with a business meeting or similar event attended with them.

Non-Officials

Consult OxyChem’s Gifts and Hospitality Policy when giving gifts or hospitality to, or receiving gifts or hospitality from, non-officials.

Government Officials

There are special concerns involving offering or giving gifts or hospitality to Government Officials. The U.S. and most other countries have strict limitations on the value and nature of gifts and hospitality Government Officials can legally receive. ***Approval from the OxyChem Legal Team is required prior to providing any gifts or entertainment to a Government Official.***

“Government Officials” include:

- Official or employee of a governmental entity, department, agency, ministry or instrumentality (including personnel at executive, administrative, regulatory, legislative, and judicial government functions)
- Officer or employee of a company owned or controlled by a government (such as state-owned oil companies)
- Candidate for political office or elected official (even prior to taking office)
- Employee of a political party
- Officer or employee of a public international organization (such as the United Nations or World Bank)
- Royal family member
- Any person employed by or acting on behalf of any of the foregoing

FAQs



Q: A supplier gave me 4 tickets to an upcoming sports event, but the supplier is not attending. Can I accept the tickets?

A: Since the supplier is not attending the event, the tickets may be accepted only if they meet the criteria for a gift. In determining the tickets' value, you must consider the market value of the tickets, which may be higher than their face value. If such value exceeds the monetary threshold set forth in OxyChem's Gifts and Hospitality Policy, you must seek approval from OxyChem's Legal Team to accept the tickets. The OxyChem Gifts and Hospitality Policy is available on the OxyChem Ethics and Compliance intranet site.

Q: Is a Visa gift card an appropriate gift?

A: No. Since a Visa gift card can be used without restriction, it is equivalent to cash, which is not a permitted gift.

Q: My daughter applied to work with an OxyChem supplier with whom I work. Can I call the supplier to put in a good word for my daughter's application?

A: No. You calling the supplier about your daughter's application could be interpreted as seeking that her job application receive preferential treatment because of the supplier's relationship with OxyChem. Requesting a personal favor from a commercial counterparty, such as the hiring of a family member, violates the Code's prohibition against solicitations.

POLITICAL CONTRIBUTIONS AND LOBBYING ACTIVITIES

Political Contributions

Since most countries regulate the process and restrict the amount a company may contribute to a political candidate or campaign, ***approval from the OxyChem Legal and Government Affairs teams is required prior to the company making any such political contribution.*** The company must also comply with requirements as to registration, reporting and recordkeeping regarding such donations. Communications regarding public interest issues important to OxyChem's business and operations may be published to employees.

Employees are encouraged to participate in the political process outside work hours, including making political contributions from their personal funds. Employee contributions of personal time or funds to any such political or community activities, including any OxyChem-approved political action committees, are permissible but entirely voluntary.

Lobbying Activities

Most countries regulate government relations or “**Lobbying Activities**,” including the registration, reporting, and recordkeeping of such activities. ***Approval from the OxyChem Legal and Government Affairs teams is required prior to contacting or otherwise engaging a Government Official (as defined above) or agency on behalf of OxyChem*** for the purpose of advocacy or otherwise influencing any governmental legislation, regulation, or any other official government action.

TRADE PRACTICES AND CONTROLS

OxyChem employees and third parties who engage in import/export and other trade activities on behalf of OxyChem must understand and comply with all applicable legal requirements and restrictions. Serious penalties, fines, and even criminal prosecution, as well as the loss of the company’s import and export privileges, can result if the company fails to comply with the legal trade requirements and restrictions outlined below.

Import and Export Controls

OxyChem complies with all import and export laws and regulations involving the movement (including re-exportation and transshipment) of goods, products, technology, services, software, and data across international borders. The transmission of certain technical information and data may also require a special export license or equivalent, even for oral, written or electronic disclosure within the U.S.

Trade Sanctions

OxyChem complies with all U.S. economic and trade sanctions and restrictions involving designated countries, individuals, entities, vessels and activities. Trade sanctions imposed by other governments or organizations, such as the European Union or United Nations, also may restrict where and how OxyChem can conduct business. ***Any suspected violations of these legal restrictions must be reported immediately to the OxyChem Legal Team.***

Anti-boycott Compliance

OxyChem complies with all U.S. anti-boycott laws, meaning that OxyChem will not directly or indirectly engage in any activity that could support a foreign boycott not endorsed by the U.S. government. Prohibited boycotts may include requests to refuse to do business with a person or company based on race, religion, sex, national origin or nationality. Such “refusal to deal” provisions can appear on the terms of sale and other documents for commercial transactions. U.S. law requires that any request to participate in an illegal boycott be reported to the U.S. Government within 30 days of the end of the quarter in which the request was received. ***Immediately seek guidance from the OxyChem Legal Team prior to accepting or taking any action regarding a boycott request.***

ANTITRUST AND COMPETITION

OxyChem conducts business and operations in full compliance with applicable antitrust and competition laws, meaning that any agreement or collusion with a competitor to restrain trade is presumed illegal and therefore strictly prohibited. As indicated below, an illegal agreement may involve price fixing, allocation of customers or territory, bid rigging, group boycotts, and any other coordination among competitors to restrict competition. Such an agreement could be inferred from informal discussions or even just the exchange of competitively sensitive information. This risk necessitates heightened care to ensure any interactions with a competitor are handled appropriately and are undertaken for a legitimate purpose. Violations of the antitrust and competition laws can result in serious penalties, fines, and even criminal prosecution for OxyChem and any individuals involved.

Activities prohibited by the antitrust and competition laws include:

- Market and customer allocation
- Group boycott/refusal to deal
- Resale price maintenance
- Tying and exclusivity arrangement (presumed unlawful)
- Abuse of a dominant market position
- Price discrimination or predatory pricing

Pursuant to antitrust and competition law requirements, competitively sensitive information should never be exchanged with a competitor, even in a social setting or in passing, including as to:

- Pricing (including pricing policy and strategy)
- Customers
- Costs or inventories
- Territories
- Market surveys and studies
- Terms and conditions of sale or credit
- Product research and development
- Production plans and capabilities
- Marketing and product plans
- Strategic business plans
- Employee compensation or benefits

Under some limited circumstances, competitors may have a legitimate business purpose for sharing what otherwise would be competitively sensitive information, such as for a joint venture and selling/buying product from each other. The OxyChem Legal Team will provide guidance for the meeting agenda, limiting the meeting attendees, and what information can be exchanged.

FAQs



Q: I am OxyChem employee attending an industry meeting. In a breakout session, the employee of an OxyChem competitor asks the group attendees to agree that our products should all cost the same price in a certain geographic area. What should I do?

A: If a competitor raises a competitively sensitive topic (such as product pricing or allocation of customers), the OxyChem personnel (and third parties acting on behalf of the company) should stop the discussion immediately and inform the competitor that such topics cannot be discussed for antitrust reasons. If the competitor insists on continuing on the topic, the OxyChem personnel should leave the meeting and report the incident to the OxyChem Legal Team.

LEGAL REVIEW OF CONTRACTUAL OBLIGATIONS

Contractual obligations must accurately reflect the intention of the contracting parties as to all material terms. No “secret,” unwritten or “side” contracts, agreements, amendments or modifications, settlements, arrangements, or waivers are permitted. ***The OxyChem Legal Team should be consulted prior to entering into a contractual obligation on behalf of the company.***

WORKPLACE REQUIREMENTS

Keeping our workforce healthy and safe, while protecting the environment, are OxyChem's highest priorities.

HEALTH, SAFETY AND THE ENVIRONMENT

OSHA's Voluntary Protection Programs have recognized OxyChem's sites as among the safest in the U.S. All OxyChem personnel are expected to proactively identify, assess, and manage risk with a mindset of continuously improving safety and eliminating hazards and unsafe conditions. Moreover, OxyChem conducts its business and operations according to the principles of Responsible Care®.

All OxyChem personnel must serve as stewards of safety by:

- Following safety rules, eliminating unsafe conditions, completing all required training, and asking questions if any requirement is unclear
- Paying attention to surroundings and looking for hazards
- Never taking shortcuts or bypassing safeguards
- Ensuring contractors and visitors receive required safety training and follow OxyChem's safety rules
- Being mindful of health and safety risks and immediately reporting any accidents or unsafe practices or conditions



OxyChem is also committed to protecting the environment by operating with the highest health, environmental, safety, process risk and security standards, and complying with applicable laws. OxyChem is dedicated to continuously improving environmental performance and participating in internal and external audits to evaluate progress and ensure compliance.

All OxyChem personnel must serve as stewards of the environment by:

- Complying with policies and procedures related to the operation of OxyChem facilities and the proper identification and disposal of waste
- Providing accurate and complete information for environmental permits, reports and other regulatory submittals
- Being mindful of risks to the environment and immediately reporting any leaks, spills or releases to management

Failure to comply with OxyChem's health, safety, and environmental policies and procedures could place OxyChem's personnel and contractors, the neighboring communities, the environment, and the company's assets at risk. Such failure to comply could constitute misconduct and carry serious penalties, fines, and even criminal prosecution, as well as disciplinary action, up to and including termination of employment pursuant to applicable laws.

FAQs



Q: I see a contractor not wearing fall protection while preparing to access an unprotected elevated surface. I have no responsibility for the contractor. What should I do?

A: At OxyChem, safety is every employee's responsibility. If you see anyone at an OxyChem facility not following a safety rule, you must take immediate action to stop the non-compliant activity (if you can do so safely). In this situation, you should politely tell the contractor to wear the required fall protection equipment prior to accessing the elevated surface. You should also inform your supervisor and/or the safety personnel at the facility.

Q: There are signs on the walls of the plant stating that safety glasses must be worn in all operating areas. But an employee who works in the office never wears safety glasses when walking through the operating areas. I have asked the employee to wear the glasses, but the employee claims that since he is not actually working in the operating area, just passing through quickly, he does not have to wear safety glasses. Is that acceptable?

A: That is not acceptable. Next time the employee walks through the operating areas without wearing safety glasses, please remind him that there are no exceptions when it comes to wearing the required personal protective equipment (PPE). If he refuses to wear the safety glasses as required, you should raise that as a concern with your supervisor and the safety personnel at the plant, for them to ensure that the unsafe behavior is prevented.

Q: While walking through the operating unit, I notice a leak from a pipe flange dripping to the concrete below. It has a sweet-smelling odor like an organic. I assume the local operator is aware of it, but I don't see anyone nearby. What do I do?

A: Any unaddressed leak in a production unit is a cause for concern. Always report those to a nearby operator or the appropriate control room. A leak to the environment needs to be addressed immediately – even when it is to concrete – so that it can be evaluated against the applicable requirements. It's always better to over-report than under-report these conditions.

YOU HAVE STOP-WORK RESPONSIBILITY IF CONDITIONS OR BEHAVIORS ARE UNSAFE.

If someone is violating a safety or environmental policy or procedure, you must:

- Tell the person to stop the unsafe activity immediately (if you can do so without putting yourself in personal jeopardy); and
- Notify the leadership and safety or environmental personnel at the site, so they can address the situation and maintain safe conditions at the site.

EMPLOYMENT PRACTICES

OxyChem is committed to all having a safe, respectful and inclusive experience at work, where differences are embraced and collegiality is appreciated. The conduct of all OxyChem personnel must be professional, with respect for all.

Equal Employment Opportunity

The diversity of OxyChem employees is an extraordinary asset. OxyChem provides equal opportunity in all aspects of employment without regard to race, religion, color, national origin, disability, genetic information, marital status, sex, age, veteran status, sexual orientation, gender, gender identity, protected leave status or any other protected classes under applicable law. Equal employment practices are integral to all aspects of employment at OxyChem, including recruitment, hiring, job assignment, compensation, promotion, demotion, transfers, discipline, termination, layoff and recalls, and access to employee benefits, training, facilities and social and recreational activities.

Harassment Prevention

OxyChem is committed to providing a workplace free from harassment. OxyChem prohibits the discrimination or harassment against any employee on the basis of any legally-protected class, whether the harassment is perpetrated by an employee or non-employee. Prohibited harassment includes unwelcome verbal, visual or physical conduct that creates an intimidating, offensive or hostile work environment.

Examples of prohibited harassment in the workplace include:

- Unwelcome sexual flirtations, advances or propositions
- Obscene jokes
- Lewd comments
- Racial slurs
- Repeated requests for dates
- Inappropriate touching, staring or other sexual conduct
- Verbal abuse of a sexual, racial, ethnic, religious, physical or mental limitation, or other protected category
- Graphic verbal comments about an individual's body
- Sexually degrading words used to describe an individual
- Displays of sexually suggestive objects or pictures, or other material derogatory to racial, ethnic, religious or other protected categories
- Any other unwelcome or unwanted conduct based on an individual's sex or other protected category

No supervisor or manager may threaten or insinuate, explicitly or implicitly, that an employee's refusal to submit to any form of harassment will adversely affect the employee's position, compensation, pay, benefits, job duties, work schedule, career development or any other condition of employment.

Prohibited discrimination or harassment is a serious violation of this Code and is not tolerated at OxyChem. Suspected violations should be reported immediately through one of the available reporting channels.

Workplace Violence

OxyChem prohibits violence and threats of violence of any kind in the workplace. OxyChem employees are expected to resolve their differences through collegial discussion and, if necessary, with the assistance of their Human Resources representative. Employees who have been threatened with, or subjected to, physical violence by anyone in the workplace should report it immediately to their Human Resources representative, OxyChem Security, or the OxyChem Legal Team. Also, an employee who is being threatened by someone outside OxyChem should promptly report such a threat.

Substance Abuse (Drugs and Alcohol)

The use or abuse of any substance that adversely affects safety, good judgment or job performance is a violation of this Code. Employees' use, possession, sale, purchase or transfer of alcohol or illegal drugs while on the job or on OxyChem premises is prohibited. Reporting to work or working while under the influence of alcohol or illegal drugs is also prohibited. The use of a legal drug may also be prohibited if it creates a safety concern regarding OxyChem employees or the public, or if job performance is significantly impaired. More information is available in the Drug and Alcohol Policy adopted by each OxyChem location.

Information Systems Monitoring

OxyChem monitors the use of information systems to ensure compliance with this Code, company policy, and applicable law. Electronic devices (such as computers, phones and tablets) must be used professionally, respectfully, and responsibly. Communications through OxyChem's systems, an OxyChem-issued device, or a personal device while working on OxyChem's behalf, must not involve offensive, obscene, sexually-themed or threatening content.



Communications through OxyChem's systems, an OxyChem-issued device, or a personal device while working on OxyChem's behalf, are not private and do not create an expectation of privacy. Subject to applicable law, OxyChem reserves the right to access, monitor, log, archive and disclose information contained in the company's information systems and devices.

OxyChem reserves the right to block offensive, illegal or non-business-related web sites and, in accordance with applicable law, review the entire content of any messages or data transmitted, stored on or deleted from OxyChem's systems or devices.

Employees must cooperate with any request by the OxyChem Legal Team to preserve and search for OxyChem information on mobile devices in connection with investigations and other legal purposes.

FAQs



Q: A co-worker has been making inappropriate remarks and jokes that make me uncomfortable. His behavior is common knowledge, but people ignore it, saying it is just his personality. What should I do?

A: Offensive and inappropriate behavior has no place at OxyChem and is not tolerated. You should raise this concern with your Human Resources representative or submit a report through Navex. Please provide details, including what was said, when the comments were made, and the names of others who heard the comments.

BUSINESS INTEGRITY

CONFLICTS OF INTEREST

A conflict of interest arises when an employee has a personal activity or financial interest that may interfere with their ability to act in OxyChem's best interest. Any person who is working for OxyChem must avoid activities that could conflict or appear to conflict with their responsibilities to OxyChem.

All actual, apparent, or potential conflicts of interest must be disclosed as set forth in this Code. Having a conflict of interest is not necessarily a Code violation but failing to disclose it contravenes the Code. Actual, apparent or potential conflicts of interest must be disclosed by filling out the Conflict of Interest form available [here](#).

Personal Relationships

Within OxyChem:

Close family relationships could improperly influence or appear to improperly influence business decisions. For this reason, close family relationships with another OxyChem employee or someone applying to work at OxyChem as an employee must be disclosed.

When a personal friendship or romantic relationship develops in the workplace, it can cause conflicts of interest. Such relationships must never cause other employees to feel uncomfortable, unwelcome or disfavored. Supervisors may not have a romantic relationship with a subordinate or another employee in their management chain, even when the relationship is voluntary and welcome. Any personal or romantic relationships must be disclosed in accordance with this Code of Conduct. In the case of a relationship between a supervisor and an employee in their chain of command, the supervisor is responsible for reporting the conflict.

Outside of OxyChem:

In some circumstances, the relationships that employees have outside of work can conflict with OxyChem's interests. These may arise if a family member or close friend works for or owns a OxyChem customer, supplier, or competitor. Therefore, close personal relationships with a current or potential OxyChem counterparty or competitor must be disclosed. Unless disclosed and approved in compliance with this Code, an employee must not:

- Engage a family member or close friend to provide services to OxyChem
- Review or approve work involving a family member or close friend
- Make or influence decisions that may benefit a family member or close friend

If a family member or close friend works for a competitor, care must be taken to not disclose confidential information to them.

Side businesses and other outside employment

Conflicts may arise if an employee owns a side business or has employment outside of OxyChem. This includes working as a consultant, contractor, or employee for another business, serving on the board of directors of another business, or having a government position, whether paid or unpaid. Outside employment does not automatically amount to a conflict of interest, but prior approval is required in the following circumstances:

- Before accepting outside employment with:
 - A competitor, customer or supplier of OxyChem
 - Another company in the chemical industry
 - A company engaged in a business related to goods or services sold or purchased by OxyChem
 - A company that is seeking to hire an employee for the same specialized knowledge or skill that they use in their work for OxyChem
- Before engaging in a side business that might compete with OxyChem or an OxyChem customer or supplier, or that is related to goods or services sold by OxyChem
- Before accepting a position as a government official, whether elected or appointed
- Before agreeing to serve as a consulting or testifying expert witness

If approved or otherwise permitted, any side business or other outside employment must be kept separate from the work done for OxyChem by not:

- Doing work for any other employment during OxyChem work hours
- Disclosing OxyChem confidential information
- Using OxyChem computer systems or other assets for any other employment
- Promoting products or services of any other employment to OxyChem or OxyChem employees, customers or suppliers
- Not leveraging a position at OxyChem to promote any other employment

Financial Interests or Business Opportunities

Having ownership or a financial interest in a firm that does or seeks to do business with, or is in competition with, OxyChem, may also create an actual or perceived conflict of interest. Prior approval is required before making a material financial investment in such business. A “material financial investment” is one that would cause the employee to have a significant stake in the success of the business. Stock ownership in a publicly traded company or a mutual fund typically does not create a conflict, but if you believe it could be a concern due to a particular situation (former employment with a competitor resulting in large ownership of its stock), please consult the OxyChem Legal Team.

Through working for OxyChem, an employee may learn of a business or investment opportunity of potential interest to OxyChem. Such information is considered an OxyChem asset. Approval from the OxyChem Legal Team is required before an employee may act on the opportunity privately or through any outside employment they may have.

FAQs



Q: When is a relationship with a family member or a personal friend who works for an OxyChem vendor so close as to cause a conflict of interest under the Code?

A: If it reasonably appears that your relationship with a family member or friend could cause you to make decisions or take actions that are not in OxyChem’s best interest, the relationship presents at least the appearance of a conflict of interest and must be disclosed to the OxyChem Legal Team.

Q: A market research firm has asked me to be a consultant on a project that relates to my work for OxyChem. They will pay me on an hourly basis for my services. Can I accept the offer?

A: You should decline. The market research firm may be collecting competitive intelligence for an OxyChem competitor. Also, despite assurances that you will not be asked to disclose confidential information of OxyChem, it may be difficult for you to fulfill your obligations to the market research firm without sharing more information that you should.

Q: I have been offered an opportunity to serve as an Advisory Expert for a University. Can I accept this position?

A: OxyChem encourages its employees to pursue their development and build industry relationships through opportunities of this sort. If you decide to accept the position, you will need to keep it separate from your work for OxyChem and take care not to use or share any confidential information of OxyChem.

FINANCIAL REPORTING AND INTERNAL CONTROLS

Maintaining Accurate Books and Records

Fair and accurate books and records are essential for compliance with anti-bribery laws, the management of company business, as well as the integrity of financial reporting. OxyChem maintains its books, records and accounts in reasonable detail, to accurately and fairly reflect the company's transactions and the purchase or disposition of assets.

Examples of business records include:

- Supply Chain and Commercial — Records of procurement, sales and supply chain activity
- Finance — Records of income, expenses and taxes
- HSES — Records of environmental monitoring inspections, security, and occupational health operations, product data sheets and placarding
- Human Resources — Records of employee compensation, time worked and vacation
- Operations — Records of equipment function, maintenance and other plant operations, lab and testing data, and research and development records

Any attempt at or actual concealment or misstatement of information in OxyChem's records is strictly prohibited. Every employee is responsible for reporting any suspected or actual irregularity, discrepancy or inaccuracy with respect to records or corporate reporting, to the OxyChem Legal Team.

Concealment or misstatement could include:

- Signing a document without the appropriate authorization
- Misreporting hours on a timesheet
- Falsifying expense reports
- Creating secret or off-balance sheet accounts
- Establishing offshore accounts for illegitimate reasons
- Not including important information in a record or report

FAQs



Q: My supervisor told me to sign off on a batch sheet confirming that all required tests were done, even though I know some of the tests were not completed. Is it OK to take this action if directed by a supervisor?

A: No. You should not sign or approve a business record that you know is incorrect. It is also a violation of this Code for your supervisor to direct you to approve a record that is known to be inaccurate.

Q: We found a new distributor for a territory where we have struggled to find a reliable business partner. We would like to begin the relationship on a “trial basis,” by setting up the distributor as a customer in SAP. If that works out, we will later request approval to appoint them as a distributor. Is this permissible?

A: No. All sales intermediaries engaged by OxyChem—including distributors—must complete the review process before OxyChem does any business with them. This is extremely important because a distributor is representing OxyChem (acting on OxyChem’s behalf) in the marketplace, and we need to ensure that the distributor does not have a history of ethical or legal misconduct; and verify that the distributor understands its obligations. Knowingly classifying a distributor as a customer, even for expediency, is a falsification and a violation of this Code.

Preventing and Detecting Fraud

OxyChem prohibits all forms of fraud, including any deception to secure an unfair advantage or any scheme to defraud someone out of money, property or services.

To prevent fraud on OxyChem, employees are responsible for understanding approval limits and other internal controls relevant to their job responsibilities, and for following the policies and procedures related to such controls. Employees are also responsible for understanding what expenses they are approving and for ensuring that the transactions and supporting documentation accurately reflect the nature, timing, and value of the event. Employees must therefore be alert to detect suspicious activity and report any suspicion of fraud or other wrongdoing.

Fraud can appear in many different forms, such as:

- An employee taking scrap metal or obsolete equipment for personal use without proper authorization
- Spoofing a legitimate OxyChem customer or supplier to misdirect payments to fraudulent bank accounts
- Overstating goods or services on an invoice
- Falsifying expense reports or timesheets

Audits performed by OxyChem's Controller help to ensure compliance with established policies, procedures and controls. Audits also help identify potential areas of weakness, so that such may be remedied. Cooperation with all internal and external audits is required under this Code, including providing clear and truthful information during the audit and investigation process.

Anti-Money Laundering

OxyChem prohibits any activity that facilitates money laundering, referring to the disguising of earnings or assets obtained through criminal activity, so that such earnings and assets appear to have been obtained through lawful means. OxyChem employees are responsible for conducting reasonable due diligence on persons or entities doing business with OxyChem, to ensure that such are engaged in legitimate business activity and their funds have been sourced legally.

Suspicious activity that might indicate money laundering includes:

- Payments for services or goods that do not seem to have been performed or delivered
- Requests for a single payment to be split into multiple transactions
- Complicated payment arrangements with no obvious business purpose
- Requests for payments to/from third parties not otherwise involved with OxyChem
- Payments for purposes that are not accurately or transparently described in related documentation

PROTECTION OF PROPERTY, ASSETS, DATA AND INFORMATION

Company Property and Assets

OxyChem's assets, including real property, facilities, capital equipment, tools and machinery, supplies, computer hardware and software, parts, raw materials, products and other inventory, and goodwill are critical to OxyChem's success. Every employee must ensure that OxyChem property and assets, as well as the property of other businesses for which OxyChem may be responsible, are protected and used appropriately. OxyChem property should not be removed from a company site without proper authorization or used for personal reasons. Incidental or occasional personal use of OxyChem office equipment, such as phones, computers, tablets or copy machines may be permitted within reason. However, excessive use of such company equipment is prohibited.

Confidential and Proprietary Information

OxyChem's property includes confidential and proprietary information that has not been released publicly. To ensure the confidentiality of such information, OxyChem employees must:

- Keep confidential information in a secure location, to prevent accidental or unauthorized access
- Allow access to confidential information only to OxyChem employees with a need to know
- Not discuss confidential information in public areas or where persons not authorized to receive the information may overhear
- Not disclose confidential information to anyone outside OxyChem unless a confidentiality/non-disclosure agreement is in place or otherwise approved by the OxyChem Legal Team

Downloading, printing, or otherwise retaining OxyChem's confidential or proprietary information for personal use (including when leaving OxyChem's employment) is strictly prohibited. The obligation not to use or disclose OxyChem's information survives the termination of employment. Such information could include:

- Pricing data
- Financial data
- Trade secrets & know-how
- Acquisition or divestiture opportunities
- Marketing & sales strategies
- Business plans
- Inventions
- Research & development information
- Development projects
- Customer or supplier information
- Personnel information
- Information labeled "Confidential"

Intellectual Property

OxyChem's intellectual property is a valuable asset, including OxyChem's trade name, inventions, improvements and ideas — whether or not eligible for patent, trade secret, know-how, copyright, trademark or other legal protection. Any idea or invention that is originated or developed by an OxyChem employee in the course of working for the company is the sole property of OxyChem. Unauthorized disclosure or use of OxyChem's intellectual property is prohibited.

OxyChem also requires that employees fulfill any contractual obligations that they may have to former employers with respect to the use of intellectual property, including any secrecy obligations.

Data Privacy

OxyChem is committed to respecting and protecting the personal data and privacy of all persons, including employees or applicants, directors, contractors, shareholders, customers, suppliers, vendors and other third parties that do business with OxyChem or on its behalf. Personal data should only be collected and used for legitimate business purposes, in compliance with applicable law. Employees should take reasonable steps to safeguard personal data from unauthorized access, disclosure, or misuse, and must not share personal data with third parties unless required for legitimate business purposes and in compliance with applicable law and company policy. Any actual or suspected breach of personal data access must be reported to the OxyChem Information Technology Team or the OxyChem Legal Team immediately.

Personal data is any information relating to an identified or identifiable natural person, including names, email addresses, phone numbers, physical residence addresses, identification numbers, photographs, employment details, and financial information.

Cybersecurity

Protecting OxyChem's information systems is a shared responsibility of all employees. It follows that all employees who use the OxyChem information systems must comply with all account and password standards and all company policies and procedures to protect the security and integrity of OxyChem's information systems and digital assets.

Users can help protect OxyChem's information systems by:

- Not clicking on hyperlinks in emails from unknown or suspicious sources or opening suspicious files
- Keeping computers and other devices current with updates issued by the OxyChem Information Technology Team
- Never attempting to disable or circumvent any software or technology that protects OxyChem's information systems
- Keeping computers and other devices safe and secure from theft
- Using unique and strong passwords that are not shared with others

Any potential theft, loss or unauthorized disclosure must be reported to the OxyChem Information Technology Team immediately.

External Communications

Employees must direct all inquiries from the media or similar organizations to the OxyChem Communications Team. OxyChem personnel at all times must comply with OxyChem's Confidential Company Information Policy and External Communications Policy when communicating externally.

FAQs



Q: One of my co-workers told me that she moved OxyChem documents and records to her personal cloud storage for more convenient access from the external site. Is that allowed?

A: Saving OxyChem documents, records, or files outside of the company's network and firewall protections is not allowed. If your co-worker is having trouble accessing such files from OxyChem's network, he should contact OxyChem's Information Technology Team for assistance.

Q: I work in OxyChem's procurement group. A potential new supplier is requesting that we provide OxyChem financial information as part of the qualification process. Can I provide this financial information?

A: OxyChem's financial information is confidential. If there is a legitimate business reason to share such financial information, Finance Team approval and a non-disclosure agreement would be required.

HUMAN RIGHTS

OxyChem upholds that every person is entitled to fundamental human rights. The company supports the right to a safe work environment; not to be discriminated against or harassed on the basis of race, religion, color, national origin, disability, genetic information, marital status, sex, age, veteran status, sexual orientation, gender, gender identity, protected leave status or any other protected classes under applicable law; and to receive compensation that meets basic needs; as well as the right to a workplace free of child labor and slave labor.

OxyChem is therefore committed to:

- Not hiring any person under the age of 15
- Forbidding human trafficking, slavery or servitude of any kind within our sites and operations
- Complying with applicable labor laws, including restrictions on working hours and rights of association
- Providing wages and benefits that meet or exceed legal requirements (with overtime pay as applicable)
- Providing full-time employees with a living wage
- Providing a safe and healthy workplace for all individuals working at or visiting our facilities

OxyChem's commitment to human rights extends to the countries and communities where it conducts business and has operations, their corresponding cultural values, and the rights of indigenous peoples as recognized by applicable law, giving appropriate regard to self-sufficiency, sustainability, health, safety, and the environment.

OxyChem strives to ensure that its supply chain reflects the company's respect for human rights. To that purpose, OxyChem has adopted a Supplier Code of Conduct, which is available [here](#).

ADDITIONAL RESOURCES

OxyChem is in the portfolio of companies owned by Berkshire Hathaway Inc. As such, OxyChem is responsible for complying with the Prohibited Business Practices Policy available [here](#) and applicable laws and regulations.

“We must continue to measure every act against not only what is legal but also what we would be happy to have written about on the front page of a national newspaper in an article written by an unfriendly but intelligent reporter.”

– Warren Buffett



QUESTIONS AND DOUBTS

Please raise any question, doubt or need for further information regarding this Code and its requirements to OxyChem’s Legal Team or the Navex Hotline (available at: <https://www.brk-hotline.com> or call **1-800-261-8651** in U.S. and Canada).

OxyChem[®]