

## CALIFORNIA TRANSPARENCY ACT DISCLOSURE

### DISCLOSURES REQUIRED PURSUANT TO THE CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT OF 2010

On January 1, 2012, the California Transparency in Supply Chains Act of 2010 (SB 657) went into effect in California. On March 26, 2015, Modern Slavery Act 2015 was signed into law. The laws are designed to increase the amount of information made available by manufacturers and retailers regarding their efforts to address the issue of slavery and human trafficking.

In 2013, INEOS Styrolution introduced its Code of Conduct setting forth, among other things, our own internal principal that INEOS Styrolution will not engage in child or forced labor or human trafficking of any kind. Since then, we have upgraded our Code of Conduct based on our corporate values and societal expectations, significantly expanding our announced policies with respect to the prevention of forced labor and human trafficking, the prevention of child/underage labor and freedom of association and collective bargaining. All of our employees receive periodic training with respect to our Code of Conduct, including our policies regarding forced labor and human trafficking. In addition, all of our new hires are required to certify that they have read and understand our Code of Conduct as a condition to their employment. Employees and contractors who violate the spirit or letter of our policies or our Code of Conduct are subject to disciplinary action up to and including termination of their employment. The current policy is available at: <http://www.ineos-styrolution.com/portal/corporate-governance>.

INEOS Styrolution is committed to conducting its business in an ethical and responsible manner that supports and respects the protection of human rights. We work to identify and do business with suppliers and contractors who aspire to conduct their business in a similar manner. During 2015, we announced our Supplier Code of Conduct and sent our Supplier Code of Conduct to all of our existing suppliers, noting our expectation that each supplier would adhere to our Supplier Code of Conduct. Our Supplier Code of Conduct sets forth our belief that all employees deserve a fair, hygienic and ethical workplace and that employees must be treated with dignity and respect. Our Supplier Code of Conduct also requires our suppliers to sustain the highest standards of human rights, including

- prohibiting discrimination based on gender, age, disability, marital status, sexual orientation, race, ethnicity, national origin, social origin or status, indigenous status, religion, caste, political affiliation or union membership
- requiring that our suppliers provide a workplace free of harassment, coercion and abuse
- prohibiting any threats or other forms of intimidation
- requiring that our suppliers ensure that all work is voluntary
- prohibiting trafficking in persons or using any form of forced, bonded, slave or prison labor
- prohibiting the employment of anyone under the age of 15 or the applicable minimum legal age, whichever is higher

- requiring adherence to all applicable laws and regulations with respect to working hours and days of rest
- requiring that fair and reasonable pay and working conditions be provided in accordance with all applicable laws
- requiring that suppliers freely allow employees to associate with others, form and join (or refrain from joining) organizations of their choice and seek representation to bargain collectively, without undue interference, retaliation, discrimination or harassment.

As of the end of 2016, all of INEOS Styrolution's standard purchase orders and contract templates have been updated to include new provisions that require suppliers' compliance with our Supplier Code of Conduct, with the intent that all new suppliers must abide by our Supplier Code of Conduct. When supplier supplied forms are used, we endeavor to include adherence with our Supplier Code of Conduct within the terms of the contract.

INEOS Styrolution does not currently require our suppliers to provide us with compliance certifications or self-assessments related to slavery or human trafficking and does not currently perform compliance audits on our suppliers related to these issues. However, INEOS Styrolution continuously reviews and reassesses our supplier qualification processes, including consideration of requiring actions on the part of our suppliers related to these issues, and may, in the future, impose additional requirements.