

## Corporate Compliance Position

### Our Commitment to Ethics in Business Practices

Nexeo Plastics, LLC and its subsidiaries and affiliates (“Nexeo Plastics”) are firmly committed to conducting business with the highest standard of ethics and corporate compliance. We believe in doing the right thing and thus setting an example of model corporate citizenship and sustainability for our employees, customers, suppliers and stakeholders. We have established a comprehensive Corporate Compliance Program, including formal governance, documented policies, grievance and reporting mechanisms, and required employee training to put this philosophy into practice.

A foundation of our Corporate Compliance Program are our [Global Standards of Business Conduct](#) (“GSBC”) available on our website. They serve as the cornerstone of our commitment to corporate compliance and set the principles for our actions. The GSBC define the expectations for all our employees with regard to legal, ethical, respectful and inclusive practices and behaviors.

#### Governance

Our Legal and Compliance team manages the Corporate Compliance Program, educating our employees, staying abreast of global compliance requirements set by various governments, constantly seeking to improve current compliance programs, and investigating compliance concerns. We maintain and manage formal grievance and confidential reporting mechanisms, including a 24/7 hotline, which enables any individual to report concerns, such as safety and compliance, without fear of retaliation, of association or other human or labor rights violations. We do not tolerate discrimination on the basis of race, color, religion, disability, national origin, age, sexual orientation, gender, gender identity and expression, marital status, citizenship status or any other characteristic of diversity.

#### Financial Ethics, Anti-Corruption and Anti-Bribery

All employees are expected and required to act ethically, honestly and with integrity when conducting business for Nexeo Plastics. This includes full and accurate disclosure of financial reports, acting in good faith and with due diligence, and avoiding potential conflicts of interest or relationships.

Under U.S. and foreign anti-corruption laws and regulations, it is prohibited for anyone (including contractors, consultants or distributors) to offer, pay, promise to pay, accept, agree to accept or authorize giving of any money or anything of value, directly or indirectly, to or from anyone, in order to secure or maintain a business or other advantage. Even an appearance of such behavior can be damaging to the organization and the individuals involved.

**Anti-Trust**

We are committed to compliance with the competition and anti-trust laws of the United States, the European Union and other countries where we conduct business. Under these laws, employees are restricted or prohibited to engage in bid rigging, price fixing, agreeing with competitor to restrict output, allocating markets, setting illegal vertical restrictions, engaging in resale price maintenance, boycotting, tying, creating below-cost and predatory pricing, etc. To accomplish compliance, we offer live and online training for our employees, as well as live support from our Legal and Compliance team to assist them in making the right decisions in the marketplace. We conduct a monthly review of competitor exposure activity to identify areas where ad-hoc training for the commercial team may be beneficial.

**Supplier Code of Ethics**

As a distributor, we believe that long-term, trusting partnerships and collaborative relationships with our suppliers are founded on a shared set of values and standards, enabling us to achieve sustainable business growth. Nexeo Plastics, therefore, aims to ensure that our direct and indirect suppliers, vendors, sub-contractors, distributors, consultants and advisors adhere to certain standards of ethical conduct in the business activities they perform on our behalf. We have collected this set of ethical and responsible expectations in our [Supplier Code of Conduct](#) which defines the standards, practices and behaviors we expect of each supplier.

Our public compliance policies and statements are available on [nexeoplastics.com](http://nexeoplastics.com).

Approved by:



Carrie A. Rutherford  
Executive Vice President &  
Chief Administrative Officer

*This policy has been approved by the Board of Directors of Nexeo Plastics UK Limited in compliance with the UK Modern Slavery Act 2015.*