

Ethics and Compliance Statement

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, corporate compliance and sustainability. We believe in doing the right thing and thus setting an example of model corporate citizenship and sustainability for our employees, officers, directors, customers, suppliers and stakeholders. We have established a comprehensive Ethics and 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 Ethics and Corporate Compliance Program are our Global Standards of Business Conduct (“GSBC”) available on our website. This ethics policy reflects not only the essence of corporate compliance, but also the ethical standards Nexeo Plastics uphold, and defines the expectations for all our employees, officers and directors with regard to legal, ethical, respectful and inclusive practices and behaviors.

Governance

Our Legal Team manages the 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.

Respect for others

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.

Workplace Violence

Workplace violence is a global issue that requires comprehensive prevention and response measures to ensure safety and compliance with international standards and laws. We have implemented policies, conduct risk assessments, provide training, and established reporting systems to prevent all forms of workplace violence, including harassment. Nexeo Plastics is committed to fostering a culture of mutual respect and addressing both physical and psychological safety, ensuring protection for all employees from violence and harassment in the workplace.

Diversity

We strive to build a diverse workforce of employees with different backgrounds, experiences, and perspectives. Since the markets in which Nexeo Plastics compete are increasingly diverse, we must have a diverse workforce and fully utilize the talents and ideas of all employees. Therefore, we recruit, develop, and retain talented people, as well as respect and value the diversity of their contributions.

Safety and Security

For the safety and security of everyone, Nexeo Plastics prohibits firearms and other weapons on any of our premises or while engaged in our business. We also prohibit any form of violence, even the threat of violence, in the workplace. Employees are encouraged to report any threats to the Legal Team or Hotline. We reserve the right to inspect personal and work areas as well as conduct background investigations and drug screenings as part of employment procedures, adhering to all applicable laws that may restrict these practices.

Financial Ethics

We aim to create value by achieving superior financial results. To fulfill this goal, we must always produce honest, accurate, and complete financial information. Our commitment includes adhering to strict accounting principles and standards and have appropriate internal controls and processes. The Chief Executive Officer and Chief Financial Officer are responsible for implementing and maintaining a system of internal accounting controls sufficient to provide reasonable assurances of, for instance, transactions are authorized and properly recorded.

Artificial Intelligence

We are dedicated to the ethical development and use of artificial intelligence (AI), prioritizing transparency, fairness, and accountability of any AI system Nexeo Plastics uses, with the goal to prevent bias and discrimination while protecting data privacy and confidential information. We monitor and evaluate AI technologies to prevent harm, support sustainability, and achieve positive societal outcomes. Additionally, we regularly update our AI approach in collaboration with stakeholders to address emerging trends and challenges.

Data Privacy

We are committed to adhering to laws protecting personal data privacy and confidentiality, ensuring that all personal information is managed according to legal requirements and data processing protocols. We require that company-provided technology only be used for authorized business purposes. Nexeo Plastics reserves the right to monitor network activity, including data transmission and storage, to ensure compliance with policies and laws, always respecting privacy within legal boundaries. Nexeo Plastics implements robust data security measures to protect personal data from unauthorized access, alteration, or disclosure. Our commitment to data privacy is integral to maintaining the trust of our employees, customers, suppliers, and other partners.

Conflict of interests

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

Anti- Corruption

We strictly prohibit anyone acting on behalf of Nexeo Plastics, whether directly or indirectly, from making or receiving bribes, improper payments, or making promises of any benefit to influence another party. Wherever we do business, we must comply with all applicable anticorruption laws. It is prohibited for any employee, third-party representative, or agent (including contractors, consultants, or distributors) to offer, pay, promise to pay, accept, agree to accept, or authorize payment of any money or anything of value, directly or indirectly, to or from anyone, to secure or maintain an improper advantage, or to induce conduct that amounts to a breach of the expectation that a person will act in good faith, impartially, or by a position of trust.

Anti-Trust and Competition

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, engaging in resale price maintenance, and creating below-cost. To accomplish compliance, we offer online training for our employees, as well as 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.

Sustainability

Nexeo Plastics emphasizes the importance of sustainability and its vital role in environmental protection. We have committed to minimizing our environmental impact, promoting social responsibility, and implementing sustainable practices across our operations. We are committed to comply all relevant laws and regulations, exceeding basic requirements, by continuously evaluating ways for reducing waste, and promoting sustainable transportation. Nexeo Plastics aims to foster a culture of sustainability among its employees, customers, suppliers, and the communities it operates in, while delivering high-quality products and services.

Protecting Human Health And The Environment

Ensuring the safety and health of individuals and the environment is part of our business strategy. We are committed to maintaining a secure and responsible workplace through regular safety training, inspections, and protective measures.

Our efforts extend to minimizing our environmental impact by reducing or preventing waste, emissions, and developing processes for safely managing our products. We aim to foster awareness and responsibility among employees and partners in using our products sustainably, actively promoting environmental care and continuous improvement in safety practices. Compliance with laws and policies, proactive environmental stewardship, and prompt reporting of potential issues are components of our approach.

Modern Slavery & Human Trafficking

Modern slavery, including forced labor, child labor, and human trafficking, is a global issue that particularly affects vulnerable groups. International laws provide comprehensive guidelines to combat these practices. Nexeo Plastics we do not tolerate any type of forced labor or human trafficking in our operations. We are committed to proactively respecting human rights and preventing any involvement in such abuses. We prioritize working with suppliers and service providers sharing our commitment to comply with laws addressing modern slavery and human trafficking.

Training and Communication

To ensure all employees are well-equipped to uphold our standards, we have implemented a mandatory training program on our Global Standard Business Conduct. This program educates employees on our code of conduct, related policies, and the practical application of ethical guidelines in daily work. Regular participation helps employees understand our ethical expectations and manage potential workplace situations. The Global Standard Business Conduct and related policies are accessible via our digital platforms for easy reference, and we hold periodic refresher sessions to keep the information relevant and prominent.

Our public compliance policies and statements are available on nexeoplastics.com.