

Policy to Combat Slavery and Human Trafficking

I. Purpose

Nexeo Plastics, LLC and its subsidiaries and affiliates (“Nexeo Plastics” or “Company”) are committed to high standards of ethical, honest and legal business conduct. In an effort to achieve these high standards, Nexeo Plastics is committed to ensuring that its business partners, including consultants, agents, distributors, customers and vendors, do not use slave labor or engage in human trafficking or human trafficking activities, including but not limited to the use of forced labor. Nexeo Plastics realizes that slavery and human trafficking can occur in many forms, and we encourage our business partners and our employees to promptly raise any concern related to these types of activities.

II. Policy Statement

We will adhere to ethical practices in our business and will not tolerate or condone any form or practice that constitutes human trafficking or slavery in any part of our global organization. We expect and require compliance with all applicable laws and regulations, including the applicable laws of the U.S. Government, and our policies, which are designed to protect each employee, business partner and the Company from potential liabilities and penalties.

Furthermore, we expect that each of our business partners conduct their business with the same commitment to ethical business practices as Nexeo Plastics. The workplace practices that we expect from our business partners include but are not limited to:

- Ensuring that they do not use slave labor, illegal child labor, or forced labor
- Ensuring that overall terms of employment are voluntary
- Ensuring that all local applicable laws and regulations are being followed, including but not limited to as it relates to minimum age requirements, wages, and the number of hours worked in a given week
- Promptly identifying and reporting to Nexeo Plastics any suspected or actual violation of this policy

Nexeo Plastics may conduct an internal verification of its supply chains to evaluate and address the risks of human trafficking and slavery as appropriate.

Failing to follow these laws and policies may result in any number of serious consequences, including probation, suspension without pay, reduction in salary, termination of employment and restitution, as well as civil and criminal fines and imprisonment. Nexeo Plastics will enforce this policy with appropriate disciplinary measures, up to and including termination of any contracts with Nexeo Plastics’ business partners.



III. Reporting

If you have any questions or concerns, please contact the Legal Department directly at compliance@nexeoplastics.com. In addition, the Company has established a Hotline (1-844-473-0068) for reporting of any actual or suspected violations of this policy. Employees based outside the United States should report online at nexeoplastics.ethicspoint.com. Nexeo Plastics will promptly and thoroughly investigate any claim or indication that a business partner or employee is engaged in human trafficking or slave labor activities. If any party is found to be in violation of this policy, Nexeo Plastics will take prompt, remedial measures to address the violation.

IV. Training

Company employees are required to complete periodic Code of Conduct training conducted by Legal Department that includes a review of these topics. The Legal Department will maintain training attendance and training completion records.

V. Effective Date

Effective April 1, 2019; last updated May 1, 2020.

Approved by:

A handwritten signature in dark ink that reads 'Carrie Rutherford'.

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.