



Performance by design.
Caring by choice.™

Supplier Principles of Conduct



A Message from Our President and Chief Executive Officer

At Chevron Phillips Chemical, our ability to operate safely, reliably, and ethically is strengthened by the relationships we build across our global supply chain. We are grateful for the important role our suppliers and service providers play in our operations.

To guide our shared success, the Supplier Principles of Conduct outlines the standards we expect from all suppliers and service providers. These principles reflect our unwavering commitment to legal compliance, ethical business practices, environmental stewardship and respect for human rights.

These principles are not just guidelines; they are part of the foundation for how we work and grow together. We seek to create long-term business relationships with suppliers and service providers who not only share our values but also extend them throughout the broader supply chain, contributing to a culture of transparency, accountability and continuous improvement.

By aligning with these principles, we can continue to earn the trust of our stakeholders, and help Chevron Phillips Chemical move toward its vision of becoming the world's premier chemical company. We value the integrity, mutual respect, and commitment to excellence that define our supplier and service provider relationships, and we look forward to continuing this journey together.

Steve Prusak
President & CEO

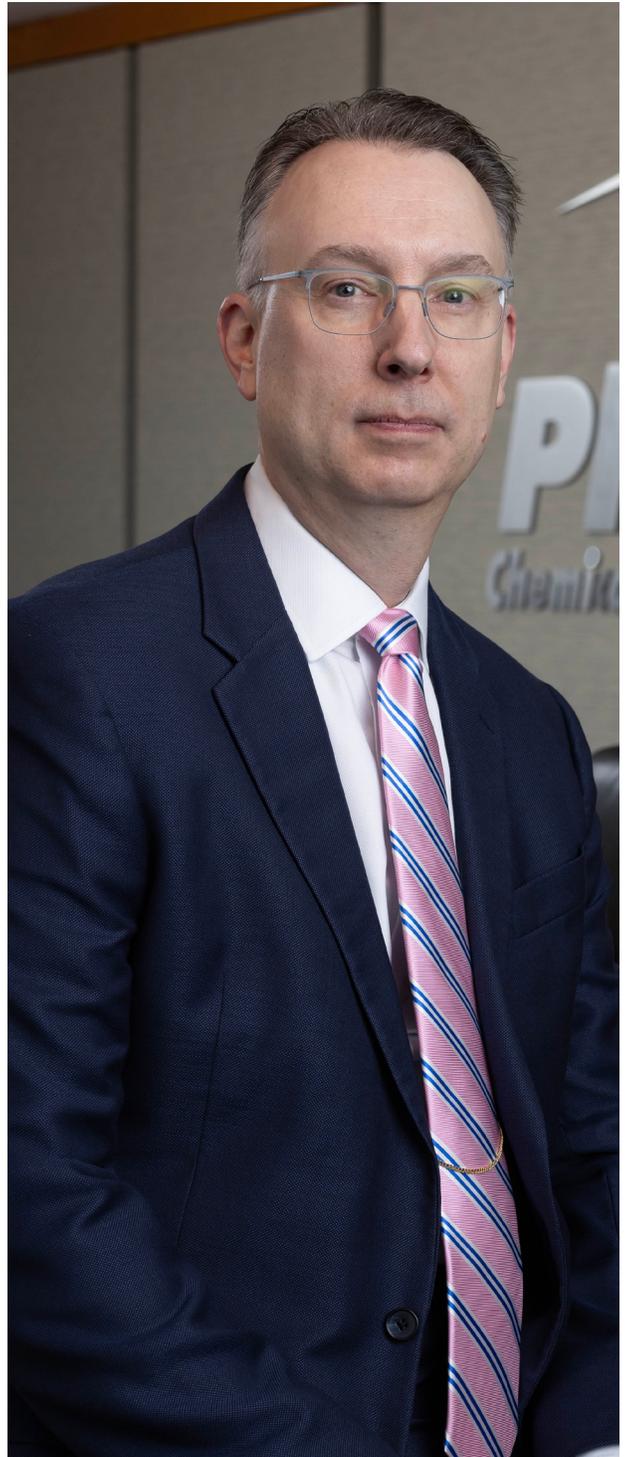


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I. Introduction

Chevron Phillips Chemical and our wholly owned subsidiaries around the world (together “CPChem”) take our legal and ethical standing in the business community very seriously and in turn, we choose to work with suppliers and service providers who share the same values and commitments. The Supplier Principles of Conduct (“SPOC”) is not a contract; its purpose is to clearly set out CPChem’s values and basic expectations regarding the standards of business conduct and social responsibility of our suppliers, services providers and third-party labor providers (collectively, “Suppliers”). By consistently following the guidelines outlined herein, CPChem and its Suppliers can each contribute to building a reputation as businesses that operate with the highest integrity.

The goal of the SPOC is to drive sustainable and socially responsible procurement practices throughout our global supply chain.

This document outlines the expectations we have for all Suppliers with whom we engage.

We do not make compromises in these areas, and we expect our Suppliers to always adhere to these expectations and values.

Suppliers may be invited periodically to provide supporting documentation and complete forms provided by CPChem demonstrating their efforts to adhere to the SPOC.

The SPOC should not be read to alter, amend or otherwise change the terms of any contract between CPChem and any Supplier. Likewise, it should not be read to create any other relationship beyond what is contained in any written agreement between CPChem and any Supplier.

We expect our Suppliers to:

- Read and adhere to the expectations herein.
- Share our commitment to socially responsible and sustainable operations and practices.
- Conduct business in full compliance with applicable laws, rules and regulations of the locations in which they operate.
- Maintain robust compliance systems and a proven record of legal and regulatory adherence.
- Communicate these requirements to subcontractors and the supply chain, and promote accountability to adhere to the same standards.
- Participate in CPChem’s requests for Supplier trainings, self-audits, and formal audits (whether corporate or operational locations) or provide specific data regarding performance of any element.
- Develop a corrective action plan to bring operations into SPOC conformance so that our companies can maintain a business relationship.



II. Labor and Human Rights



We expect Suppliers to uphold fair employment practices that reflect a shared commitment to dignity, inclusion, and ethical conduct in the workplace. This includes maintaining a work environment free from discrimination, harassment, and exploitation, respecting human rights, and ensuring compliance with all applicable labor laws and regulations.

CPChem commits to respect human rights as set out in our [Human Rights Commitment Statement](#)

Suppliers should also align with internationally recognized standards such as the International Labour Organization (ILO) Core Conventions, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises. We expect our Suppliers to:

Anti-discrimination and Anti-human Trafficking

- Act professionally and treat employees with respect without regard to race, color, religion, gender (including pregnancy), sexual orientation, gender identity, age, national origin, disability, veteran status, genetic information, family medical history, or any other basis prohibited by law.
- Respect internationally proclaimed human rights throughout the value chain, do not directly or indirectly use forced, bonded, involuntary labor (including modern slavery and human trafficking), child labor of any kind, or inputs produced using such labor.
- Ensure that all recruitment processes are fair and ethical and that all recruitment fees or related costs are borne by the employer, not the worker.

Working Conditions

- Commit to a workplace free of harassment, discrimination, physical or mental punishment, and any other form of abuse or coercion, or unreasonable restrictions on entering or exiting company-provided facilities.

- Provide facilities for basic hygiene needs, access to potable water and sanitary food preparation and storage facilities. Dormitories or other housing provided by a supplier directly or through an agency should be clean, safe, and of adequate size per person, and equipped with emergency egress, heat and ventilation, and reasonable entry and exit privileges.
- Respect the right of your employees to freely associate, and engage in collective bargaining in accordance with applicable laws and regulations. Ensure that workers can exercise these rights without fear of discrimination, retaliation, or harassment.



Wage and Hour Practices

- Comply with all applicable wage and hour laws, rules and regulations, including adequate wage, overtime and maximum hours per work period, along with all legally mandated benefits.

Subcontractor Compliance

- Ensure that any workers supplied by subcontractors will be treated in a manner consistent with the labor and human rights principles set forth herein.
- Enable your employees and other stakeholders to anonymously report concerns or potentially unlawful practices at the workplace.
- Implement due diligence measures to identify, prevent, and mitigate adverse human rights and labor rights impacts within your supply chain and to provide evidence of compliance upon request.

Equal Opportunities

- Demonstrate evidence of your commitment to advancing equal opportunity, merit-based decision making, and compliance with all applicable anti-discrimination laws within your value chain.

III. Environmental

At CPChem, we believe the chemical industry and its supply chain should practice good stewardship of the environment and our natural resources. We expect our Suppliers to:



Environmental Permits and Reporting

- Obtain and maintain all required environmental permits and adhere to reporting requirements.

Hazardous Materials & Waste Management

- As and where applicable, provide Safety Data Sheets (SDS) and have procedures for responsible disposal or recycling.
- Commit to Operation Clean Sweep® principles. Conserve natural resources and document efforts.

Transportation

- Comply with laws for transporting goods, especially hazardous materials. Suppliers are encouraged to take steps to improve their transportation environmental footprint and to share data on such efforts upon request.

Materials Restrictions

- Adhere to all applicable laws, regulations and CPChem requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.
- Provide data regarding substances in any materials supplied to CPChem that may require disclosure to governmental bodies, suppliers or customers.
- As and where applicable, disclose the presence of these materials along with your policies and practices for management of the supply chain for these materials.

Responsible Sourcing of Agricultural Materials

- Ensure agricultural materials are legally sourced.

Energy Consumption and Air Emissions

- Monitor and seek to minimize pollutant air emissions.
- Share GHG emission data, targets and reduction plans upon request.
- Implement initiatives that seek to enhance energy efficiency and lower GHG emissions and/or emissions intensity. If requested, Supplier data and reduction plans should be provided.



IV. Health and Safety

CPChem's priority is the health, safety, and wellbeing of all individuals involved in its operations and supply chain, whose talents and hard work help us produce and deliver our products and services. We expect our Suppliers to:



Occupational Safety and Health

- Conduct all activities conforming to environmental, safety, and health laws and regulations.
- Identify, evaluate, and mitigate safety and health hazards using design, engineering, administrative controls, and safe work practices.
- Provide or require equipment with appropriate safeguards to minimize worker exposure to potential hazards.
- Provide and use Personal Protective Equipment (PPE) when necessary.
- Provide health and safety information and training in a

language workers understand.

- Publish safety information visibly.
- Provide training to all workers prior to the beginning of work and regularly thereafter.
- Encourage workers to raise safety concerns and have documented methods in place to capture and address all concerns brought forward.

Emergency Preparedness

- Establish and document comprehensive emergency plans and response procedures, including training, evacuation protocols, hazard detection, and mitigation systems. These plans should demonstrate preparedness

for emergencies and outline measures to reduce or eliminate potential harm to people, equipment, facilities, and the surrounding community.

Drug and Alcohol Policies

- Ensure employees do not work under the influence of alcohol, illegal drugs, or misused medications.
- Prohibit possession, transfer, or sale of these substances at work.



v. Ethics and Compliance



The CPChem Ethics & Compliance (E&C) Office reinforces CPChem’s commitment to honesty and integrity and seeks to continuously improve CPChem’s policies, practices, and training to adapt to the ever-changing regulatory and compliance environment. We expect our Suppliers to:

Anticorruption Compliance

- Conduct appropriate risk-based diligence prior to engaging service providers or other suppliers to ensure that all parties comply with the SPOC and applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act.
- Never engage in bribery, kickbacks, corruption, extortion, money laundering, embezzlement, or any other corrupt practices to gain an undue or improper advantage.
- Refrain from making or soliciting social or charitable contributions on behalf of CPChem without prior approval from CPChem’s E&C Office and the CPChem Corporate Communications Manager.
- Exercise heightened caution when interacting with government officials, including employees of state-owned enterprises, political party officials, including candidates for public office, and officials of public international organizations.
- Obtain prior written approval from CPChem’s E&C Office before making any payment or offering anything of value—such as gifts, entertainment, or travel—on behalf of CPChem for any reason.

- Maintain adequate internal controls over accounting practices and assets.
- Ensure that all invoices and documentation submitted to CPChem accurately reflect the true nature and amount of the transaction.
- Use payments received from CPChem solely for legitimate business purposes and never to make or reimburse improper payments.
- Avoid using personal or third-party funds to make payments prohibited by the SPOC in connection with CPChem’s business.

Antitrust and Competition

- Respect the principles of fair competition and comply with applicable antitrust and competition laws.

- Avoid any activities that may limit a business’ independent judgment or restrain free trade, including price fixing.
- Avoid tying arrangements and agreements with competitors that allocate or restrict customers, suppliers, markets, products, purchases, services, or sales territories.
- Refrain from sharing confidential information about other clients, particularly those who are direct competitors of CPChem.

Conflicts of Interest and Gifts, Entertainment and Travel

- Avoid actual or perceived conflicts of interest where the interests or relationships could exert, or appear to exert, an inappropriate influence on decisions made by CPChem employees.
- Refrain from offering gifts, entertainment, or travel that could influence, or appear to influence, CPChem decisions in relation to the supplier.
- Never offer cash or cash equivalents.

Fraud and Internal Controls

- Avoid fraudulent conduct, including acts of deception or dishonesty, false representations, collusion, or concealment of material facts.



Global Trade and Regulatory Compliance

- Ensure supply chain security and comply with global trade regulations and import/export laws.
- Abide by U.S. and other applicable (to the extent the U.S. may not impose a penalty) sanctions and embargoes.
- Demonstrate incorporation of guidelines from programs establishing secure global trade. Examples of these programs include WCO SAFE Framework of Standards, the U.S. Customs-Trade Partnership Against Terrorism, the European Authorized Economic Operator programs, and Singapore's Secure Trade Partner program.

Information Protection

- Refrain from misappropriating or misusing the intellectual property, confidential information, or any personally identifiable information exposed to or shared by CPChem and safeguard against the

unauthorized disclosure of such information.

- Use CPChem information only for business purposes and not for personal financial gain or that of friends, relatives or others.
- Refrain from making any public disclosures, statements, or releases of documents on behalf of CPChem unless specifically authorized to do so in advance in writing by CPChem.
- Avoid using for publicity, promotion or otherwise, any logo, name, trade name, service mark, or trademark of CPChem or its affiliates, including the terms and the red and blue boomerang logo, or any simulation, abbreviation or adaptation of the same, or the name of any CPChem employee or agent, without CPChem's prior approval.
- Protect and respect the personally identifiable information of employees of the businesses in your value chain.

- Comply with all applicable data privacy and security laws and regulations, including, as applicable, the European Union General Data Protection Regulation ("GDPR") (EU 2016/679) and any other similar laws enacted by applicable jurisdictions (collectively, the "Privacy Laws").



VI. Management System

Suppliers are encouraged to implement an effective management system to comply with the principles set forth in this document. At a high level, an effective management system should ensure:

Supplier's Commitment and Management Responsibility

- Identify representatives accountable for management systems.
- Apply appropriate controls for safe, reliable operations.

Training

- Provide training for new and existing employees to comply with policies, procedures, and legal requirements.

Communication

- Develop documented processes for communicating policies and expectations within the organization.

Audits and Corrective Actions

- Conduct periodic evaluations to assess compliance with legal requirements and the SPOC.
- Develop corrective action plans based on assessment outcomes.

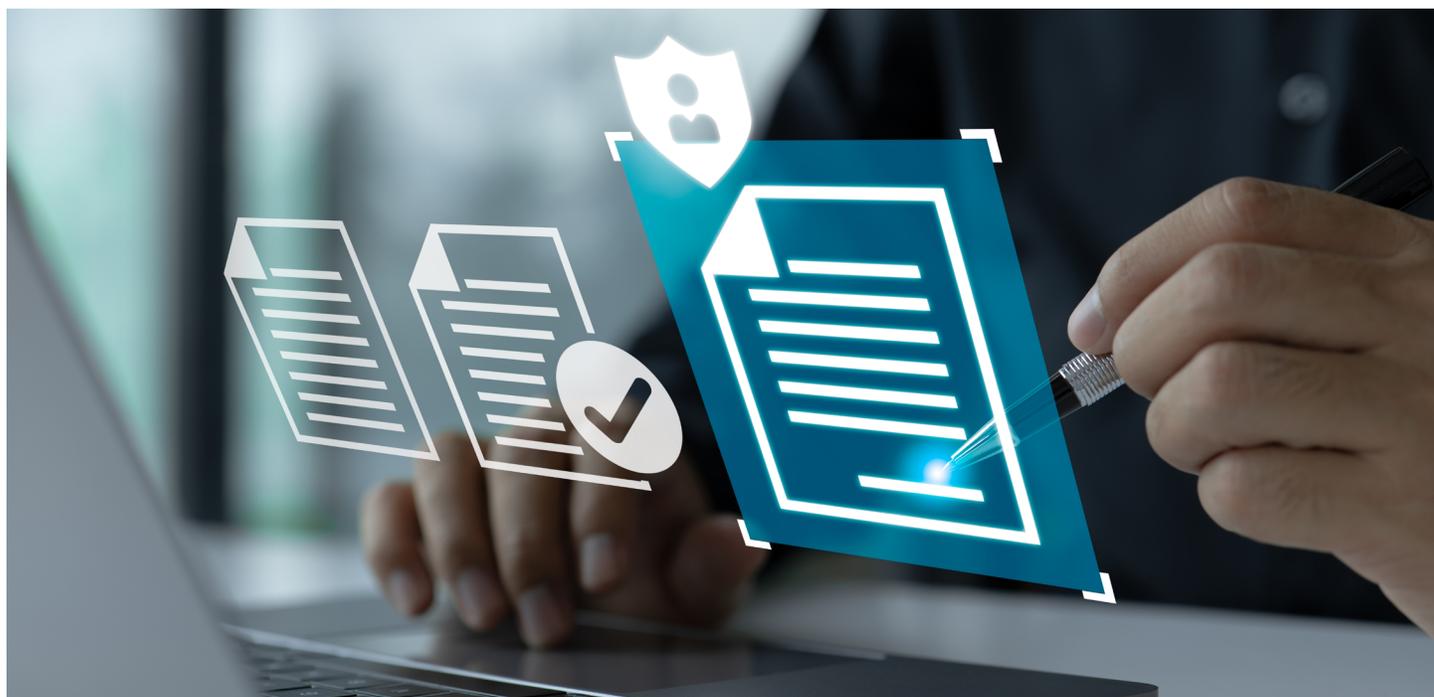
Documentation and Records

- Document processes and controls to ensure a record of accuracy and compliance.
- Maintain confidentiality and protect privacy of CPChem.

Supplier Responsibility

- Communicate CPChem SPOC throughout the supply chain.

- Encourage suppliers to adopt similar management systems and practices.
- Provide analysis and mitigation plans.



CPChem's Hotline:



CPChem is committed to appropriate conduct by its employees, suppliers, and contractors, and requires potential and questionable conduct to be reported. If you are aware or suspect that one of our employees, suppliers, contractors, or agents is acting inappropriately, we ask that you inform a member of CPChem management or report your concern through the CPChem Hotline. The CPChem Hotline provides a direct, effective, and risk-free way to anonymously report such suspected violations.

CPChem does not tolerate any form of retaliation for reports made in good faith to the Hotline.

Consistent with international standards, our Hotline is an independent whistleblower helpline and website, available in multiple languages to all employees and stakeholders 24 hours per day. Operated by EthicsPoint, a trusted third-party provider, the Hotline can be accessed through our website.

- Call the Hotline at 1-800-356-2590 (United States) or +1 503-619-1804 (international collect)
- Report via the Hotline online at www.cpchem.ethicspoint.com

