



Performance by design.  
Caring by choice.™

# Code of Conduct



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CPCHEM'S **Tenets of Operation** direct you to **seek assistance** when a situation is not understood. The same goes for the topics covered in **the Code**. There is no greater sign of good judgment than to **seek guidance** when you are unsure of your obligations or if you encounter questionable conduct.

”

— **Tim Hill**

Executive Vice President, Legal and Public Affairs, General Counsel and Secretary

## Dear colleagues,

As CPChem employees, we are all stewards of the company, and we all have a responsibility to honor our long-standing commitment to quality and integrity across our global operations.

CPChem has a solid reputation in the petrochemicals industry and in the communities we serve; we are committed to conducting business in a sound, responsible manner consistent with the highest standards and principles of our industry, our leadership, our employees and the public. To maintain our focus, we must remain diligent in making the right decisions every day or we risk losing the trust of our fellow employees, customers, suppliers, owners, joint venture partners and communities. When making decisions, we should remember who we are as a company through our tagline: Performance by design. Caring by choice™.

Our reputation is built by the ethical decisions we make and the actions we take every day. Enhancing this reputation means that we are compliant, we obey the law, and we act with integrity and ethics in every aspect of our business. We respect those with whom we interact, we keep people safe, and we operate in an environmentally responsible manner. We care by choice.

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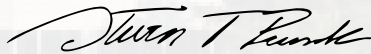
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Our Code of Conduct is designed to remind all employees of the standards to which we are held and must maintain. We will encounter situations that test our judgment, values and ethics. It is our responsibility as employees to pursue, understand and insist upon compliance with the laws and policies that must be followed regardless of our role or location.

Best regards,



**STEVE PRUSAK**

President & Chief Executive Officer



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# The Code of Conduct

Chevron Phillips Chemical is committed to conducting business ethically. By following the Code of Conduct (the Code), we demonstrate our commitment to the ethical standards that make CPChem a respected business partner and a valued member of the global business community.



## The Code

- Illustrates our core values and the rules we must follow.
- Helps you understand what to do in different situations and where to find more information.

Every employee reviews and agrees to follow the Code every year.

## Who is required to follow the Code?

- All employees and officers of Chevron Phillips Chemical Company LLC and its wholly owned subsidiaries.
- CPChem employees seconded to any of its joint venture affiliates.

## What if we're not sure what to do?

- We all need to know the Code and commit to following it. Sometimes, it's hard to know right from wrong.
- When seeking guidance, you should refer to the appropriate section within the Code as it highlights CPChem's ethical standards. While the Code doesn't cover every possible situation or list all company policies, it does tell you where to find more information.

## What happens if we breach the Code or our policies?

- Violating the Code or other company policies can lead to discipline, including termination of employment, and even criminal charges. We take our ethical standards seriously and will enforce them. Dismissal is common for any employee who commits an illegal act, theft or fraud against the company.
- All reports will be reviewed and further investigation conducted, if appropriate.
- If you suspect potential misconduct, see the following section for ways to report it.

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# How to Report a Concern

Usually, your supervisor is the best person to help with your ethics and compliance concerns. But if you need other options, you can also talk to:

- The next level of management
- Your Human Resources Business Partner
- Your local Ethics & Compliance (E&C) Committee member responsible for the topic

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## If you're uncomfortable talking to someone locally, you can contact:

- The Policy Owners. These are the departments or business units that create and manage policies related to their area of expertise.
- The E&C Office. Call one of the E&C representatives or email [ethics@cpchem.com](mailto:ethics@cpchem.com).
- The Hotline. Raise your concerns online or call the appropriate number.

## The Hotline lets you report your questions and concerns. You may remain anonymous if you prefer. It's run by an independent third party and is available 24/7 in more than 100 languages:

- Online: [cpchem.ethicspoint.com](http://cpchem.ethicspoint.com)
- In the U.S., call: 1-800-356-2590
- Outside the U.S., call: +1 503-619-1804
- No matter how you report your concern, you'll get a reference number to check the status of your concern.
- You don't have to give your name, but details like your work location and names of co-workers involved may be needed for a complete report.
- A summary of your report is sent to the E&C Office. Only the information you provide is included.

As noted in our [Non-Retaliation Policy](#), no CPChem supervisor, manager, or employee is permitted to engage in retaliation, retribution, or any form of harassment directed against an employee who reports a concern in good faith through these internal channels or directly to a regulatory agency. Any manager, supervisor, or employee who engages in such retribution, retaliation, or harassment is subject to discipline up to and including dismissal on first offense.

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CPCChem is **committed** to conducting its business in a safe and environmentally **responsible** manner. Our goal is to realize **safe, reliable** operations day in and day out. In our industry, it is essential that we **maintain** a constant **vigilance** and avoid behaviors that could impair our ability to achieve this goal. Through our **Operational Excellence System**, we become a **better** and **stronger** company every day.

”

— Elliott W. H. Johnson

Senior Vice President, EHSS & Engineering

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# Employment Practices

At CPChem, we are committed to maintaining positive employee engagement and providing a workplace free from discrimination and harassment.

We value inclusion, cooperation, accountability and respect. We hire, train, evaluate and compensate employees based on merit, qualifications and business needs.

We do our part to respect human rights by ensuring compliance with all applicable labor laws and regulations, including laws on privacy, collective bargaining, immigration, wages and hours, as well as those prohibiting human trafficking and forced or child labor.



## What does this mean in practice?

- ▲ We make employment decisions without regard to race, color, religion, sex, gender, pregnancy, sexual orientation, gender identity, national origin, disability, age, status as a protected veteran, genetic information or any other protected characteristic.
- ▲ We respect the rights, aspirations and dignity of all people.
- ▲ We provide reasonable accommodations, where appropriate, for employees with disabilities to perform their job duties effectively.
- ▲ We regularly review our employment practices to identify and correct any disparities or biases.
- ▲ We resolve conflicts and address grievances fairly and effectively, ensuring everyone feels heard and respected.
- ▼ We do not tolerate retaliation. If something's not right, we encourage you to speak up, and we promise to handle it swiftly and fairly.
- ▲ We offer training and development opportunities to all employees to support their professional growth and career advancement.
- ▲ We provide equitable pay and benefits to all employees based on their roles, responsibilities and performance.
- ▲ We prohibit discrimination and harassment in the workplace.

### Real life application

*My coworker keeps asking me out on a date after I have repeatedly said no. I think I have been sexually harassed. What should I do?*

Speak Up! Don't stay silent. Report it through the appropriate channels and support those affected.

Sexual harassment is a particularly harmful form of inappropriate conduct. It can include unwelcome flirtations or sexual advances, requests for sexual favors, unsolicited physical contact, and offensive verbal, visual or physical conduct of a sexual nature. It can also include inappropriate pictures, posters, screen savers, videos, or email messages.

### Ask yourself

Am I treating my co-workers with respect?

### Find out more

For further information, consult the [EEO & Affirmative Action Policy Statement](#), the [Human Rights Commitment Statement](#), the [Policy Portal](#) or the [Human Resources SharePoint site](#), review appropriate local policies, or contact HR or the E&C Office.

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# Drugs and Alcohol

At CPCChem, we all share the responsibility for keeping our workplace free of alcohol and improper drug use. This means that we will not use, possess, or work while under the influence of any substance that may impair our ability to safely perform our jobs. The safety of our people and our environment, quality of our products and services, and the financial performance of our company can be directly and adversely affected by the use or abuse of alcohol, drugs, or controlled substances, both legal and illegal.

For that reason, the use, possession, distribution, purchase, or sale of alcohol, drugs, or controlled substances by any person while on company premises, or while operating company equipment, is strictly prohibited. Employees must provide appropriate notification if they are taking medication that could interfere with the safe performance of their job duties. Medication properly taken pursuant to a valid prescription issued to the employee and approved, if necessary, is not a violation of policy.

Regardless of whether we work in an office, in a lab, from home, or at a manufacturing or distribution facility – all of us are subject to periodic random testing unless prohibited by law. These tests may be administered without cause, suspicion, performance issues, or the occurrence of an accident, incident, or safety violation.

Violation of this policy may be sufficient cause for dismissal on the first occurrence.

## What does this mean in practice?

- ▲ We keep our workplace free of alcohol and improper drug use.
- ▼ We do not use, possess, or work while under the influence of any substance that may impair our ability to safely perform our jobs.
- ▲ We report concerns that someone is using or abusing drugs or alcohol on the job.
- ▲ We provide appropriate notification if taking medication that could interfere with the safe performance of job duties.
- ▼ We do not put the safety of our people and environment at risk.
- ▲ We understand the requirements regarding the use of drugs and alcohol while engaged in company business as detailed in the Drugs & Alcohol Policy.
- ▲ We perform federally mandated periodic random testing for all employees unless prohibited by law.

### Real life application

*One of my coworkers just came back from lunch and appears to be under the influence of drugs or alcohol. What should I do?*

It is against our policy to work under the influence of drugs or alcohol. The coworker may be suffering from an illness as opposed to intoxication, but it is your responsibility to immediately report the situation.

### Ask yourself

Could this behavior impair my ability to perform my job safely and reliably?

### Find out more

For further information, consult the [Drugs and Alcohol Policy](#), or contact EHSS or the E&C Office.

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# Environmental, Health, Safety and Security

At CPChem, safety is a top priority. We must all be committed to making safety a reality by protecting ourselves and our fellow workers. Everyone has ownership in maintaining a safe workplace so that each person at our facilities and on our projects goes home safely every day, and we put the health, safety, and well-being of all personnel, contractors, and local communities before production.

Our Operational Excellence (OE) System is a cornerstone of our business. Applying OE includes maintaining an awareness of and complying with federal, state and local environmental, health, safety and security laws designed to protect each other and our environment. CPChem's policies may go beyond what is required by law. These policies set goals for improvement, provide alignment of activities and resources, assess and manage risks, gain stakeholder input, and rigorously audit our performance to ensure success.

To ensure that our workplaces are safe, we must commit to (i) following all applicable procedures, safe work practices, safety warning signs and instructions, (ii) wearing the appropriate Personal Protective Equipment, and (iii) acting – as opposed to reacting – to prevent accidents.



## What does this mean in practice?

- ▲ We strive each day to do our jobs in a safe, secure, injury-free and environmentally responsible manner.
- ▲ We understand and comply with permits and local laws that apply to our facilities.
- ▲ We speak up to our fellow workers when unsafe acts or hazardous conditions are observed.
- ▼ We do not sacrifice safety for any reason, including for purposes of meeting a deadline or a sales or production target.
- ▲ We wear appropriate Personal Protective Equipment.
- ▲ We reduce risks of our products through their lifecycle and encourage their responsible use and disposal.
- ▼ We do not hide a near miss, injury or a dangerous situation. If you see it, you own it.
- ▲ We communicate our results openly and welcome the input of employees and contractors, regulatory agencies, our communities, our owner companies and our customers.
- ▲ We optimize resource consumption and reduce emissions to help minimize climate and social related impacts.

### Real life application

*I know we are supposed to report injuries, but with so much riding on our reputation for safety, what does the company really want me to do?*

You should always report work-related injuries, illnesses and accidents. Safety is a core value of our company, and it will not be compromised by business objectives or personal goals. Our target of zero incidents is achievable only if we all work together to identify, report and eliminate real or potential hazards.

### Ask yourself

Does this look like an unsafe act or hazardous condition?

### Find out more

For further information, consult the [Policy Portal](#) or the [EHSS SharePoint site](#), or contact EHSS or the E&C Office.

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On CPChem’s journey to be the **premier chemical company**, each of us must remain **dedicated** to conducting ourselves with the **highest ethical standards** and maintain our company’s commitment to **operating with integrity**. Every employee is an integral part of our **internal controls design**, and every one of us plays an important role in **fraud prevention**.

”

— **Darren Ercolani**

Executive Vice President and Chief Financial Officer

# Internal Controls and Fraud

At CPChem, we have established policies, controls, systems and accounting rules to ensure the integrity of our financial reporting. These measures are crucial in preventing the inefficient and improper use of our assets and ensuring compliance with laws and regulations.

Internal controls are integral to our daily operations. Whether you are preparing expense statements, approving invoices, signing for the receipt of purchased materials or preparing inventory reports, you are part of this system. Failures in internal controls can range from deliberate misrepresentations or omissions to a series of careless or well-intentioned acts. Even minor breaches of internal controls can have significant impacts. CPChem relies on each employee's integrity to protect assets and maintain trust with stakeholders.

Fraudulent activities, such as misrepresenting financial information or stealing assets, violate CPChem policy and lead to severe penalties, including termination and criminal prosecution.

Fraud can include misusing assets, falsifying expense reports or failing to secure sensitive information. CPChem expects strict adherence to internal controls and reporting of violations to protect assets and maintain our reputation.



## What does this mean in practice?

- ▲ We maintain accurate and complete records and accounts of business transactions.
- ▼ We do not split contracts, AFEs or transactions to circumvent delegations of authority levels.
- ▲ We comply with applicable financial reporting policies and regulations.
- ▲ We report financial information and metrics accurately and timely.
- ▼ We do not falsify financial records such as company travel and procard reports, time sheets or invoices.
- ▼ We do not ignore accounting and other policies intended to prevent loss of assets.
- ▲ We respect and adhere to the established delegation of authority levels for company transactions.
- ▼ We do not take company materials or supplies for our personal use.
- ▼ We do not charge personal expenses to corporate travel or procurement procards.
- ▲ We safeguard company assets and data against theft or misuse.

### Real life application

*I have a contract that exceeds my authority level. Can I ask the vendor to split it into two separate transactions so I can approve them?*

No, splitting the transaction to bypass the delegation of authority is a violation of internal controls. You should seek approval from someone with the appropriate level of authority.

### Ask yourself

Is this something I wouldn't want my boss or team to know that I did?

### Find out more

For further information, consult the [Fraud Policy](#) and [Internal Controls – Accounting Policy 000200](#), or contact Finance or the E&C Office.

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# Information Governance

Information Governance (IG) is the overall strategy for managing information at CPChem. The IG Program outlines how CPChem manages and protects information, ensuring compliance with legal and regulatory requirements and goes beyond traditional records management. IG balances the risk that information presents with the value that information provides.

CPChem is committed to maintaining the highest standards of information governance. This involves ensuring that all information, including personal data, is handled securely and responsibly. We adhere to the following principles:

- **Confidentiality:** Information will be protected against unauthorized access and disclosure.
- **Integrity:** Information will be maintained accurately and reliably.
- **Availability:** Information will be accessible to authorized personnel when needed.
- **Compliance:** We will comply with all relevant legal and regulatory requirements.
- **Accountability:** All staff are responsible for ensuring the security and proper use and maintenance of information.

## What does this mean in practice?

- ▲ We protect sensitive business information through data classification, access controls and regular audits.
- ▲ We protect customer data, manage transaction records and comply with regulations.
- ▼ We do not store Official Records in areas like email or OneDrive.
- ▼ We do not create collections of Official Records for personal, non-business use.
- ▲ We manage Official Records in centralized repositories where access controls are implemented.
- ▲ We discuss with our supervisor or the IG Team situations where Official Records may require special consideration.
- ▼ We do not destroy records before the approved retention period defined in the Records Retention Schedule or if they are subject to a Legal or Tax Hold.
- ▲ We contact the IG Team when business changes result in new records not captured on the Records Retention Schedule.

### Real life application

*I would like to keep Official Records in my email or calendar invitations because it's easier for me to find what I'm looking for. Is this a problem?*

Official Records should be stored in centralized repositories where there is controlled access and measures have been put in place to manage the records in accordance with your organization's File Plan and the Official Records Retention Schedule.

### Ask yourself

What happens to Official Records when employees leave the organization? Will the new custodian know these records are maintained outside of the centralized repositories?

### Find out more

For further information, visit the [Information Governance SharePoint site](#) to learn more about good practices, Legal or Tax Holds, Modern Information Governance and to meet your IG Team.

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Computing technology is delivering value through **innovative** solutions, **advancement** in cloud, **artificial intelligence** and **data science**. As CPChem leverages technology to transform our business, it is up to **YOU**, our human firewalls, to make the best decisions that safeguard **confidentiality, availability** and **integrity** of company data and computer systems.

”

— Allison Martinez

Senior Vice President,  
Chief Information, Digital and AI Officer

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# Privacy

At CPCChem, we respect everyone's privacy and protect personal information. This commitment applies to all our locations worldwide. Many countries have strict rules about collecting, using and sharing personal information like names, contact details and medical data. We must keep this information safe and only let people with a legitimate need access it. Some countries also have rules about sharing personal information across borders.

## Key Points:

- **Respect Privacy:** Handle personal information carefully and follow company policies and laws.
- **Report Issues:** If you think personal information has been wrongly shared, contact the Legal Department or report it as described on pages 10 and 11 immediately. If you suspect a data breach involving personal data of individuals in the EA or Asia regions, report it immediately to the local Legal Department in the region or CPCChem IT Help Desk.



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# What does this mean in practice?

- ▲ We know and follow privacy laws where we operate.
- ▼ We do not mishandle personal information, such as sending it to people who don't need it, sending it by insecure means or leaving it in public places.
- ▼ We do not share personal information between countries without checking local laws.
- ▲ We use personal information only for legitimate business reasons.
- ▲ We limit access to personal information to only those who need it.
- ▼ We do not share employee contact lists with third parties for business purposes.
- ▲ We report any improper access, data breaches or sharing of personal information immediately.
- ▲ We classify data based on its sensitivity to ensure appropriate handling.
- ▼ We do not give personal information to third parties without ensuring it will be handled properly and with consent when required.

## Real life application

*Can I give a consultant my colleague's address and phone number?*

No. It might violate privacy laws. Instead, offer to pass the consultant's information to your colleague.

## Ask yourself

Am I putting the security of personal information at risk?

## Find out more

For more details, consult the [Global Privacy Policy](#), or contact HR, IT, the Legal Department or the E&C Office.

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# Intellectual Property

CPChem's intellectual property and proprietary information are crucial assets created by CPChem employees that are protected by copyright, trademark, trade secret and patent laws. This includes, but is not limited to, engineering drawings, customer lists, business plans, techniques, software and inventions.

Representatives must safeguard this information and not share it outside the company, including in certain cases with CPChem's owners and joint ventures, without authorization. This responsibility persists even after leaving the company.

CPChem also respects others' intellectual property rights, avoiding unauthorized use to prevent significant penalties. Information from third parties, including former employers, must not be used or shared without their written consent.

## What does this mean in practice?

- ▲ We abide by confidentiality obligations in contracts governing proprietary information disclosed to or received from others.
- ▼ We do not use proprietary information obtained at CPChem after leaving the company.
- ▼ We do not copy or download copyrighted material without the copyright owner's permission.
- ▲ We comply with company branding standards and trademark usage guidelines.
- ▲ We obtain appropriate internal permission before disclosing CPChem proprietary information outside of the company.
- ▼ We do not discuss company IP with others without an appropriate agreement, including making comments via social media.
- ▼ We do not utilize proprietary information of a former employer while working at CPChem.
- ▲ We respect our obligations to the company regarding inventions or ideas that we develop as employees.
- ▼ We do not present on or write about CPChem technology or business to an outside group before obtaining proper review and approval.

### Real life application

*I have used CPChem and third-party proprietary information to create a useful invention for the company but want to run my ideas through an AI program like ChatGPT to improve them. Is this allowed?*

You should talk to IP Legal to understand what rights CPChem has to the third-party proprietary information and to understand your obligation to submit a Patent Idea to the company. You should not input any company or third-party information into unauthorized or unvetted AI systems.

### Ask yourself

Could using others' information in a CPChem invention or AI program harm IP rights of CPChem or others?

### Find out more

For further information, consult the [IP Policy](#), [Technical Paper Release Procedures](#), [Trademark Usage Guidelines](#), [Generative AI Corporate Use Policy](#) and our [Brand Standards](#) or contact the Legal Department or the E&C Office.

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A man with glasses and a woman are looking at a laptop in a server room. The man is wearing a light blue shirt and a lanyard. The woman is wearing a white shirt and a lanyard. The background is a server room with blue lighting.

# Information Technology

In today's digital age, Information Technology is the backbone of our operations at CPChem. It enables us to efficiently manage and protect our data, communicate effectively and support our business processes. Our commitment to IT security and governance ensures that we safeguard our information assets, maintain the integrity of our systems and comply with legal and regulatory requirements.

By adhering to IT policies and best practices, we all play a crucial role in protecting the company's data and technology resources from potential threats and ensuring a secure and productive work environment.

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# What does this mean in practice?

- ▼ We do not open links or documents from unknown senders.
- ▲ We report suspicious emails.
- ▲ We lock our computer when we step away.
- ▼ We do not install unapproved software.
- ▼ We do not leave devices unattended or unlocked.
- ▲ We appropriately classify and protect sensitive and confidential information.
- ▼ We do not upload or send company data to personal email accounts or public websites.
- ▲ We follow rules for off-network messaging apps and preserve data for legal holds.
- ▼ We do not share company data with unauthorized people or unapproved AI systems.
- ▲ We timely patch and update company-owned devices.
- ▼ We do not use company devices to send or store inappropriate content.

## Real life application

*How should I handle a situation where an AI system makes a decision that seems incorrect or harmful?*

Report the issue immediately to the IT Help Desk or your supervisor. It's important to quickly address and correct any decisions made by AI systems that do not align with company values or policies.

## Ask yourself

Am I following IT policies to protect sensitive information and company assets?

## Find out more

For further information, consult the [Global Privacy Policy](#), [HIPAA policies and procedures](#), [Information Security Policies and Standards](#), [Social Media Policy](#), [Generative AI Corporate Use Policy](#) and other related policies found on the [Policy Portal](#), or contact HR, the Legal Department, IT or the E&C Office.

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The way we conduct ourselves in our business dealings impacts CPChem’s **reputation** and the **trust** we maintain with all our stakeholders. CPChem is a partner, customer or supplier to many of our major industry peers, and as part of our business activities, we may become aware of confidential, nonpublic business decisions of these companies and our publicly-traded owners. By being alert to and understanding situations that may create or appear to create a **conflict of interest**, we send a clear message about our **commitment** to do what’s right.

”

— **Kevin Ristroph**

Senior Vice President, Corporate Planning,  
Technology and Sustainability

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# Anticorruption

CPChem is committed to complying with anticorruption laws, including the Foreign Corrupt Practices Act and the U.K. Bribery Act, as well as anti-money laundering laws. We do not offer, pay, solicit, or accept bribes in any form, including through a third party, even if the refusal to make such a payment would result in losing a business opportunity.

Employees should be careful to avoid even the appearance of improper gifts when dealing with government officials. A “government official” is broadly defined and includes customs officials and employees of state-owned or controlled entities. These prohibitions also apply to anyone acting on CPChem’s behalf, such as an agent, distributor, freight forwarder, customs broker, lobbyist or consultant. Additionally, CPChem does not allow for facilitation payments. Some business expenditures associated with government officials may be acceptable if they meet certain conditions and are approved in advance.

Separately, CPChem requires accurate and complete transaction records be kept within the company. Violating anticorruption laws can lead to significant fines, individual imprisonment, and extensive damage to CPChem’s reputation.

As with all Code concerns, potential or actual violations are a serious issue that could lead to disciplinary action up to and including termination of employment, and they should be immediately reported as directed on pages 10 and 11.

## What does this mean in practice?

- ▲ We report any perceived anticorruption issues immediately as directed on pages 10 and 11.
- ▼ We do not ignore “red flags” like a close family relationship with a government official, unusual payment arrangements, unorthodox corporate structures or very high fees.
- ▲ We get the necessary approvals when taking a government official to dinner.
- ▲ We ensure records of expenses for entertaining government officials are accurate and complete.
- ▼ We do not offer, give or promise something valuable to a government official to receive an unfair business advantage.
- ▲ We check with the Legal Department if we feel like we are being asked to make a facilitation payment.
- ▲ We work with the E&C Office to do the necessary checks before engaging third-party intermediaries like distributors or freight forwarders.
- ▲ We monitor the activities of our joint ventures and joint venture partners related to the joint ventures.
- ▲ We obtain the required approval to provide a gift, entertainment or travel to a government official.

### Real life application

*If other companies are paying bribes to get business in certain countries, why can't CPChem? How can CPChem compete with these companies if we don't?*

CPChem will never tolerate paying bribes to get or keep business. We have high standards for ethical behavior and believe we can compete based on our merits. It's the law and makes good business sense.

### Ask yourself

Is a third party creating a red flag for bribery by engaging in suspicious behavior?

### Find out more

For further information, consult the [Anticorruption Compliance Policy](#), the [Third-Party Management Policy](#), the [Supplier Principles of Conduct](#), or contact the E&C Office.

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# Conflicts of Interest

As CPChem employees, we must always act in the company's best interests. This means avoiding any conflicts of interest and keeping our personal interests separate from the company's interests. A conflict of interest can happen when an employee or their family member is involved in something that interferes, or seems to interfere, with acting in CPChem's best interest. If there is a conflict of interest or something that might look like one, inform your supervisor right away and ask for guidance.

One common area for conflicts of interest is gifts, entertainment and travel (GET). CPChem has a Conflict of Interest Policy to help us figure out when GET is acceptable. This policy applies to everyone in the company. We should never ask for GET from a vendor, but modest and customary GET (except for cash or cash equivalents) might be allowed in some cases. Your business group, facility or country might have stricter rules, so make sure you know any extra policies that apply to you. Different rules apply to GET involving government officials.

## What does this mean in practice?

- ▲ We consult the Conflict of Interest Policy to determine the appropriateness of GET.
- ▲ We exclude ourselves from CPChem business decisions directly or indirectly involving family.
- ▲ We disclose personal relationships that may present a conflict of interest or the appearance of one.
- ▼ We do not participate in or influence company decisions involving business with a relative or close friend.
- ▲ We talk to our supervisor before accepting a part-time job outside of CPChem.
- ▼ We do not exploit our affiliation with CPChem in personal affairs.
- ▲ We discuss with our supervisor or the E&C Office situations where local customs may require special consideration.
- ▲ We avoid actions or relationships that cause potential conflicts or create the appearance of a conflict with CPChem's interests.
- ▼ We do not perform a part-time job using CPChem hours, equipment or materials, or otherwise misuse company resources for personal gain.

### Real life application

*I would like to do part-time work during my off hours with a company not in the chemicals industry. Is this a problem?*

You should talk to your supervisor to ensure there is no actual or perceived conflict of interest. It is important that the part-time job does not interfere with your responsibilities to CPChem. If your outside employment is with a competitor or someone doing business with CPChem, you must obtain prior written approval.

### Ask yourself

Could this look like a conflict to an outsider?

### Find out more

For further information, consult the [Conflict of Interest Policy](#) and [HR 5070 – Employment of Relatives](#), or contact HR or the E&C Office.

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# Insider Trading

Federal and state laws prohibit you from buying, selling or transferring securities if you have material non-public information. If you have inside information about a publicly traded company, like our owner companies, customers, suppliers, competitors, joint venture partners or any other publicly traded company you deal with at CPChem, you can't trade that company's securities or share the information with others who might trade.

As a CPChem employee, you must not share inside information or any nonpublic information about CPChem with anyone, including family and friends, unless they need to know in furtherance of duties. Exercise caution when handling nonpublic information and refrain from discussing it in any setting where confidentiality cannot be assured, such as restaurants, taxis, airplanes or other public places.

Protect sensitive information from unauthorized access and avoid giving advice or making recommendations about buying or selling securities of companies about which you have insight because of your work at CPChem.

## What does this mean in practice?

- ▲ We safeguard the confidentiality of the company's strategic initiatives, including any undisclosed projects or plans.
- ▲ We refrain from discussing the company's financial forecasts at a social event.
- ▼ We do not tell our family members about the company's plans for a potential acquisition.
- ▲ We decline to answer questions about potential management changes at CPChem or one of its owner companies.
- ▼ We do not engage in confidential business discussions in the airport lounge.
- ▲ We refrain from trading in a customer's stock when we are aware of a confidential proposal to increase the customer's purchase commitment from CPChem.
- ▼ We do not place an online trade in response to nonpublic information that a customer is selling a major asset.
- ▲ We share financial information only with those who need to know the information in furtherance of their duties.

### Real life application

*I overheard my spouse talk about their company buying another company. If I buy the target company's stock before the merger is announced, I know I can make a profit. Is that allowed?*

No, that information may be material nonpublic information and you may not trade securities on that basis. Doing so could lead to significant consequences for both you and your spouse.

### Ask yourself

Am I protecting CPChem's nonpublic information?

### Find out more

For further information, consult the [Insider Trading Policy](#), or contact the Legal Department or the E&C Office.

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# Fair Competition

At CPChem, we are proud to win business because of our good prices, great service and high quality. We do not take part in unfair practices like fixing prices, dividing markets, limiting production or rigging bids. We must avoid any actions that might look improper when dealing with competitors. This means not discussing prices, terms, costs, marketing plans, production plans, customers or any other confidential information with competitors.

Antitrust laws also apply in other situations, like benchmarking, trade association meetings or algorithmic pricing. If you see any improper behavior, leave the situation immediately and report it as directed on pages 10 and 11 for your and CPChem's protection.

Fair competition laws clearly ban unfair agreements between competitors, but you don't need a competitor to break these laws. Examples of unfair behavior include false advertising, making negative comments about competitors' products, abusing market power and stealing trade secrets.

These laws are complex, apply globally and vary by situation. Violating fair competition laws can lead to fines, jail time, loss of business and damage to CPChem's reputation.



## What does this mean in practice?

- ▲ We avoid situations or talks with competitors that might look like collusion.
- ▲ We leave an improper situation immediately and report it as directed on pages 10 and 11.
- ▼ We do not discuss pricing, production or other sensitive information with a competitor.
- ▼ We do not discount prices for only certain customers without a legal reason.
- ▲ We review the Meetings with Competitors Pocket Guide before going to trade shows or events where competitors might be present.
- ▼ We do not engage in benchmarking activities that suppress competition.
- ▼ We do not distribute competitively sensitive information pertaining to a joint venture.
- ▲ We avoid cooperation with similarly situated buyers regarding sellers.
- ▲ We adopt algorithmic pricing that fosters competition.
- ▼ We do not make agreements with other employers regarding our labor practices.

### Real life application

*What if my former employer is one of CPChem's competitors? Is it ok to talk with my CPChem work group about some of their sales and pricing strategies?*

No, this is not appropriate. Such behavior could be considered anticompetitive and a violation of antitrust laws. It could also constitute trade secret theft if you were to share such information with your CPChem coworkers.

### Ask yourself

How may my activities and statements be perceived by others when I'm communicating with a competitor?

### Find out more

For further information, consult the [Antitrust and Competition Compliance Policy](#) or other policies and protocols, review the Meetings with Competitors Pocket Guide, or contact the Legal Department or the E&C Office.

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# Politics and Government Affairs

CPChem supports your personal involvement in politics, but you must not participate in political activities during work hours or on behalf of the company without permission. If you are running for or holding office, there are conditions you must follow. Make sure your personal views are not mistaken for the company's views.

Several laws regulate relationships between individuals or companies and elected officials, agencies and political parties. You cannot give gifts, meals or anything of value to a U.S. public official without approval, and never with the intent to improperly influence their duties or gain an unfair advantage. Meetings, letters, emails and other communications with government officials may be considered lobbying, which requires special reporting by the company. Employees are not authorized to lobby on the company's behalf unless it is part of the Government Affairs program.

The company cannot fund any contributions to political candidates or parties without proper approval. If you are considering any political contribution, communicating with a government official on behalf of the company or pursuing or holding office, contact Government Affairs before taking action.

## What does this mean in practice?

- ▲ We volunteer for a political campaign only during non-work hours.
- ▲ We consult Government Affairs before inviting politicians to a company event.
- ▲ We check with Government Affairs whether proposed positions or statements by trade associations or other organizations representing CPChem are in line with approved CPChem positions or talking points.
- ▼ We do not post on social media representing or creating the appearance our personal views are those of CPChem.
- ▲ We use only company-approved advocacy portals to send messages that associate CPChem's name or email address with any politician.
- ▼ We do not use CPChem resources, such as copy machines, office supplies or phones, to campaign for a political candidate or to seek elected office for ourselves.
- ▲ We notify Government Affairs of policy developments that may be important to the company.
- ▲ We exercise our right to vote in primaries, referendums and general elections.

### Real life application

*I shared a video on social media that aligns with my political beliefs. Is this okay?*

Posting inflammatory, political messages on social media and identifying yourself as a CPChem employee may cause another to mistake your views for the views of the company. Remember, if you wouldn't make a comment in the office then you shouldn't make the comment online.

### Ask yourself

Am I engaging with a government official?

While most of the time the answer to that question is straightforward, other times it is not as clear. For example, municipal employees and employees of state-owned companies are government officials. Regardless of what level, there are likely restrictions on the manner in which you may engage with that government official.

### Find out more

For further information, consult the [Policy Portal](#), or contact Government Affairs or the E&C Office.

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CPC hem is **committed** to making the right decisions every day to compete **fairly** in our industry. It is **imperative** that we understand and comply with all applicable **trade laws** as we continue to expand our business **globally**. International business rules and regulations remain critical to the **success** of our business.

”

— **Justine Smith**

Executive Vice President, Commercial

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# Global Trade

It is important that we carefully observe and fully comply with global trade laws that regulate the import and export of goods, services, software and technology. These laws apply broadly to CPCChem's operations and its subsidiaries throughout the world, even if not wholly owned, and extend beyond just the shipping of products. For example, the exchange of information across borders, including by email, presentations or via the internet, is subject to these laws.

In addition to complying with import and export laws, we must also be aware of and abide by all applicable sanctions and embargoes. Sanctions and embargoes restrict people and corporations from transacting business with certain countries, groups and individuals, including those associated with forced labor, terrorist activity, drug trafficking, human trafficking and other illegal activity.

Failure to comply with these laws can lead to devastating penalties, denial of export or import privileges, potential jail time for individuals and damage to the company's reputation.

## What does this mean in practice?

- ▲ We know our customer, suppliers and partners involved in all transactions.
- ▼ We do not ignore “red flags” that our customer might be attempting to avoid applicable trade laws. (e.g., cash transaction, buying goods for which there is no market, etc.)
- ▲ We screen transactions for involvement with prohibited countries, persons and end uses.
- ▲ We ensure all relevant information is obtained when importing or exporting a product to ensure complete customs declarations (e.g., proper tariff, correct country of origin, license control designation, etc.).
- ▲ We consult with Global Trade Compliance or the E&C Office if in doubt.
- ▼ We do not accept incomplete or inaccurate documentation or records on goods to be imported or exported.
- ▲ We question unsatisfactory responses by a customer regarding end use, end user or final destination of a product.

### Real life application

*A customer whose primary business is selling home cleaning supplies is requesting to purchase a large quantity of gas odorant with payment terms of cash and delivery to a different country than their normal place of business. Are there any concerns?*

Be alert for red flags like an offer for a cash transaction and a buyer acquiring goods outside of their normal business. Consult with Global Trade Compliance for guidance.

### Ask yourself

Do I know with certainty how the buyer intends to use the product, and/or do I know who the end-user of the product will be?

### Find out more

For further information, consult the [Global Trade Compliance Policy](#), [Global Trade Compliance Policies SharePoint site](#), [Human Rights Commitment Statement](#), or contact Global Trade Compliance or the E&C Office.



## What does this mean in practice?

- ▲ We review documentation carefully to identify and report a boycott request.
- ▲ We refuse to cooperate with any restrictive trade practice or boycott that is prohibited by the U.S.
- ▼ We do not issue, open, accept, negotiate, pay, honor or confirm letters of credit containing prohibited boycott terms or conditions.
- ▼ We do not furnish information about race, religion, gender or national origin to a third party in the context of a commercial negotiation.
- ▲ We report “red flag” words like “embargo” and “blacklisted” or requirements to confirm “place of birth,” “nationality,” “race,” “origin of goods,” and “compliance with laws of [a boycotting country].”
- ▲ We consult the Legal Department when a suspected boycott request is received.
- ▼ We do not enter into international agreements without reading the fine print.

### Real life application

*During review of a contract you are negotiating with a customer in the Middle East, you find a clause that requires CPChem to certify that the goods involved were not manufactured in Israel.*

You should recognize that this is a prohibited boycott-related request and immediately report it to the Legal Department as outlined in the Antiboycott Policies & Procedures. Follow the guidance received and keep detailed records of the request and actions taken to address it.

### Ask yourself

Have I reviewed this document carefully for any boycott-related requests?

### Find out more

For further information, consult the [Antiboycott Policy & Procedures](#), or contact the Legal Department or the E&C Office.



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The CPChem Code of Conduct is also available in Dutch and Chinese.