



# NOVYN Sustainability Report 2020

inovyn  
An INEOS company



Our world  
is continuously  
**evolving**  
and so are we.



**Geir Tuft**  
CEO INOVYN  
September 2021

Sustainability is without question one of the most important and pressing challenges for modern society and at INOVYN we believe we have a vital role to play. The target is clear. The UN has set our generation's greatest challenge, to achieve carbon neutrality by 2050.

Demanding targets are not new to INOVYN. As Europe's premier chlorvinyls producer, we continually push the boundaries, using our expertise and know-how to deliver ongoing improvements to our own products and processes and those of our customers. We have best in class safety performance as well as taking leadership to drive positive change across our entire supply chain.

Our approach to sustainability is focussed around the 3Ps: people, planet and profit. For the planet, this translates to using less energy, less water and emitting less carbon.



People are our most valuable resource. We take an uncompromising view on safety. And our employees are proud of INOVYN and the work they do. In terms of the planet, this translates to using less energy, less water and emitting less carbon. Finally, without remaining profitable, we would not be able to make the transition required over the next three decades.

Our sustainability strategy is underpinned by four pillars: **responsible production, carbon neutrality, circularity and value to society.** We continue to make significant investments to advance progress across these four pillars.

In terms of **responsible production**, our first and foremost priority is safety, health and the environment (SHE). Our SHE performance sets the benchmark for our industry and we continually challenge ourselves to go further. Investing in our assets is at the heart of what we do. Over the past five years, we have spent more than €1 billion to improve our competitiveness, drive innovation and deliver significant improvements in our safety and sustainability performance.

We have a relentless focus towards achieving **carbon neutrality**. The recent launch of our new clean hydrogen business allows us to use our existing capabilities to facilitate the use of hydrogen as a key part of the transition to net-zero. We are also making key investments in decarbonisation, such as at our site in Tavaux, France. The results of which will see an emission reduction equivalent to taking 40,000 cars off the road each year. The launch of BIOVYN™, the world's first bio-attributed PVC represents a paradigm shift for the PVC industry. BIOVYN™ delivers a greenhouse gas saving of over 90%, moving us towards a carbon-neutral, circular economy.

We have an unwavering ambition to become fully circular. Our pivotal role in VinylPlus® has ensured PVC is one of the most widely recycled plastics. Progress does not stop there - we continue to make key investments to address difficult-to-recycle PVC. We see closing the loop and ensuring PVC, an intrinsically low carbon polymer, continues to play a vital role in society as paramount to our future success.

Our products' **value to society** is clear. The chemicals we produce help to underpin critical infrastructure including power generation, clean water, sanitation and healthcare. In testament to this, during the ongoing global COVID-19 pandemic, our products being used across a wide range of front-line applications from disinfectants and medicines to vital hospital equipment. Our New Product Development programme continues to focus on delivering more efficient and effective products for an evolving world.

The importance of collaborations and partnerships is demonstrated throughout our report. Whether it is our role in

PlasticsEurope, Euro Chlor and VinylPlus®; partnerships with our customers and suppliers; or our relationships with local communities, the power of many to overcome societies greatest challenges reflects our ethos on sustainability.

We are proud to share our commitment to delivering our part in this transition through our debut sustainability report.

I am proud to lead the next stage of INOVYN's sustainability strategy and look forward to tackling the challenges we will face over the coming year.



# Highlights



**Launch of BIOVYN™**, the world's first commercially available bio-attributed PVC



**New Product Development** delivers 40 new products to market in the last 5 years



**More than €1 billion** invested in the last 5 years



**Over €30 million** contributed to VinylPlus® since 2000



**Significant reduction** in worker injury rate:  
↓ **69%** for employees since 2015  
↓ **80%** for contractors since 2015



Launch of first intent **'Clean Hydrogen'** business



**EcoVadis Gold Merit** Status for 3 consecutive years

## INOVYN is Europe's leading chlorvinyls producer.

Essential to modern day life, our products are used in some of the most demanding applications and are fundamental raw materials for industries as diverse as automotive; building and construction; paints and adhesives; food; healthcare and medical; personal care; pulp and paper; renewable energy generation; textiles; and water treatment. Our well-invested, world-scale assets are complemented by an extensive international supply chain, which provides INOVYN with an excellent competitive position around the world.



**no.1**  
Global leader in Specialty PVC  
European leader in General PVC & Caustic Soda

**€3bn**  
Revenue

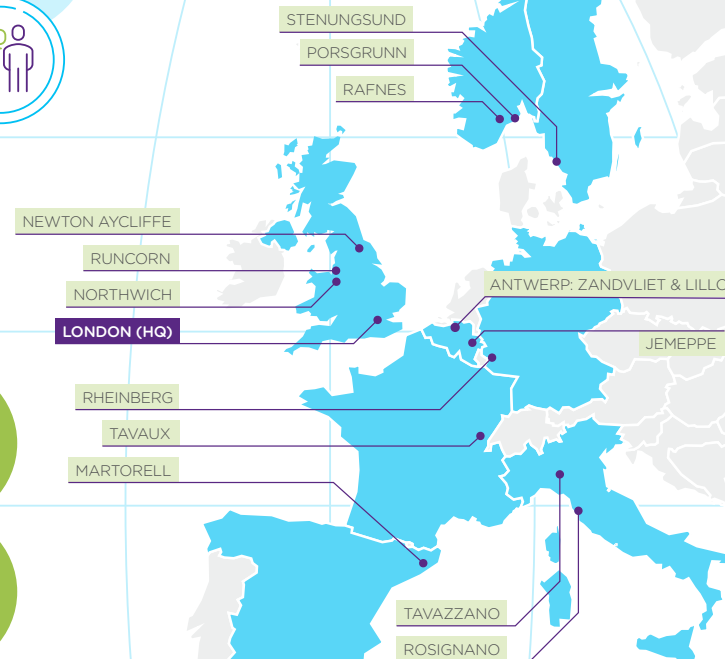
**10m**  
Annual commercial volume (tonnes)

**4,200**  
Employees

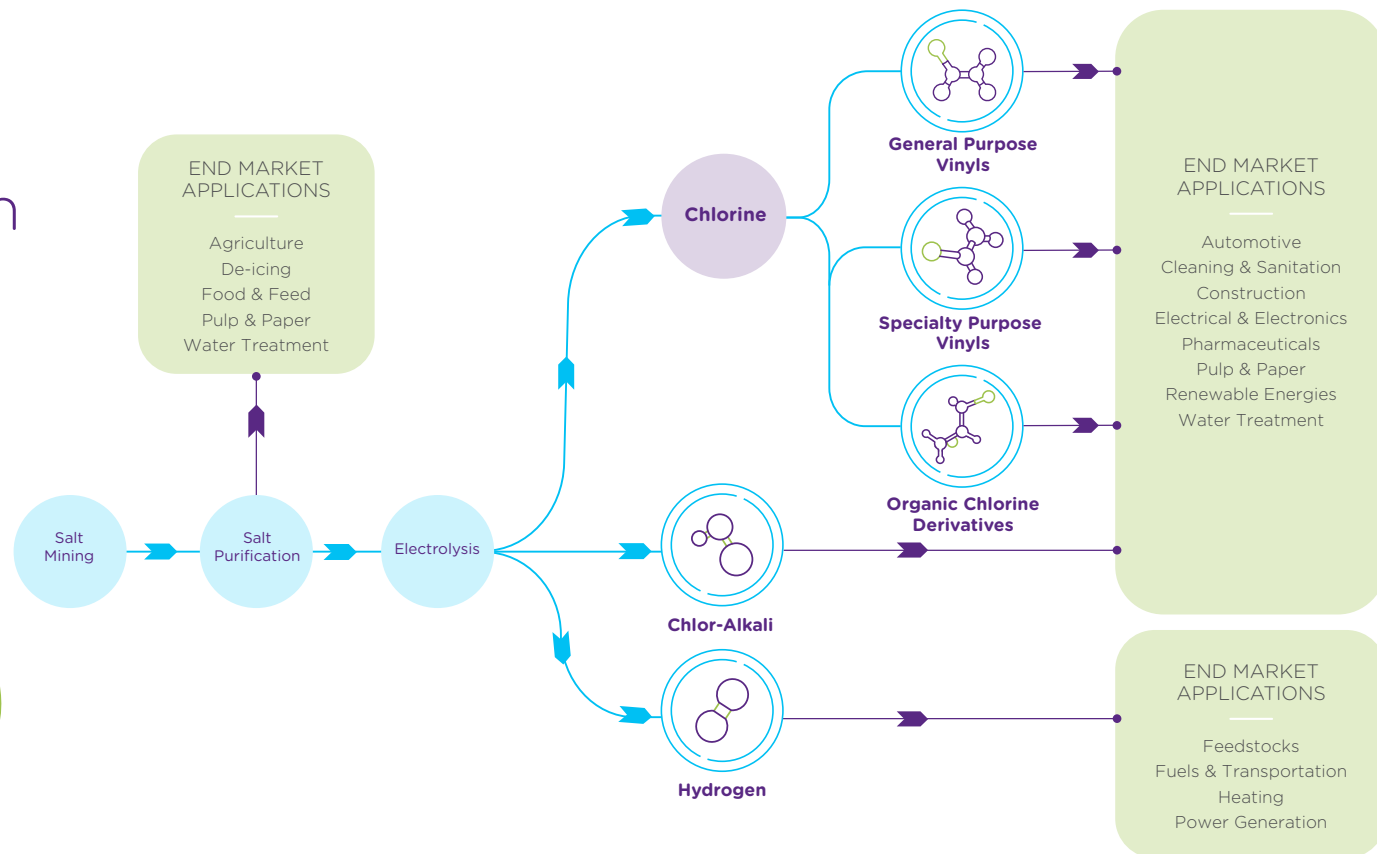
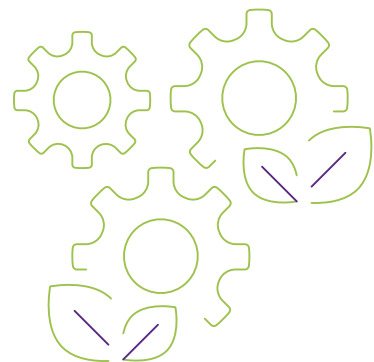
**150+**  
Products

**8**  
Countries

**15**  
Manufacturing sites



# INOVYN's Value Chain



# About this report

This report has been prepared in reference to the Global Reporting Initiative (GRI) standards, which create a common language for organisations to report on their sustainability impacts in a consistent and credible way. This enhances global comparability and enables organisations to be transparent and accountable. The report covers progress and achievements during 2020. This report also includes data and stories from previous years to provide context.

## Sustainability Materiality Analysis

We recognise that a credible **sustainability strategy** must be grounded in the needs of all stakeholders. With this focus, and to help identify important areas of concern, we performed a sustainability materiality analysis involving a wide range of internal and external stakeholders.

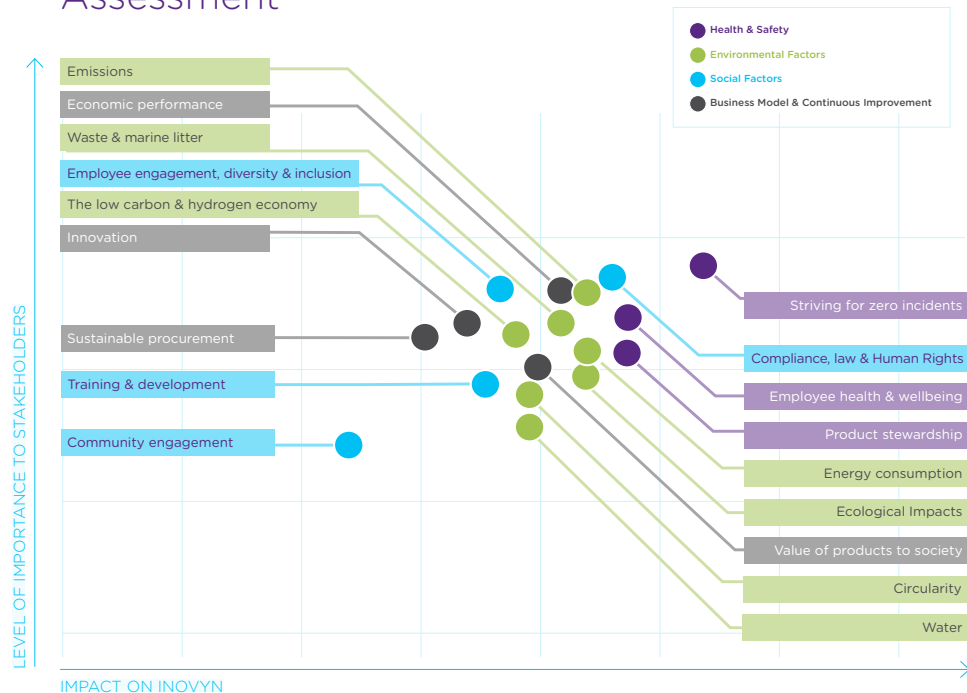
External stakeholders were selected based on their impact on our business and their interest in sustainability. These included suppliers, customers, regulators, industry associations and community groups. We also engaged with our own employees at every level in the organisation.

A sustainability materiality questionnaire was sent to these stakeholders asking them to rate sustainability topics by order of importance.

The following graph shows the results of our materiality questionnaire, with the position of our sustainability topics rated. We have developed our report to reflect these results, highlighting our work in the areas identified as most important by our stakeholders. The results have been reviewed by the INOVYN Executive and will be updated regularly.

For more information on the process, see our section on 'Stakeholder Engagement' on page 35.

## Materiality Assessment



# Supporting

## the UN's Sustainable Development Goals

The United Nations Sustainable Development Goals (UN SDGs) are a global call for a unified approach to sustainable development and were adopted by all United Nations Member States in 2015. The goals also provide a framework for businesses to pursue opportunities to solve societal challenges through innovation and collaboration.

We believe our approach to sustainability addresses the challenges presented in the goals and through concrete action allows us to pursue opportunities whilst contributing positively to society. For more information on the UN SDGs, please visit the [UN Sustainable Development website](#).

Some of the **key UN SDGs** that INOVYN has actively contributed towards



**SDG 7:** Using our capabilities as a leader in hydrogen to enable the transition to a low carbon economy. [Read more: "INOVYN Launches Hydrogen Business"](#)



**SDG 9:** Continuing to invest in upgrading our plants, adopting best available technologies and industrial processes. [Read more: "INOVYN Invests Over €1 Billion Across Its Sites"](#)



**SDG 11:** Ensuring that a continually growing and urbanising population does not have an adverse environmental effect on the planet. [Read more: "The Hope Project"](#)



**SDG 17:** Developing new and existing strategic partnerships to drive sustainable development throughout our industry and value chain. [Read more: "BIOVYN™: Replacing Fossil Fuels with Sustainable Biomaterials"](#)

**UN SDGs INOVYN contributes** to as part of our continuing sustainability efforts



**SDG 3:** Ensuring the health and safety of our entire workforce. [Read more: "Embedding our philosophy and culture of safety"](#) [Read more: "Community Care Initiatives"](#)



**SDG 6:** Providing raw materials for PVC pipes and chlorine for purification to secure affordable, equitable access to clean drinking water. [Read more: "Markets Served"](#)



**SDG 14:** Addressing marine litter and pellet loss throughout our operations and value chain. [Read more: "Operation Clean Sweep"](#)



# Our approach to sustainability

As a leader in our industry and one of the largest chlorvinyls producers globally, our products are used by millions of people around the world.

We recognise our responsibility to utilise our position to make a positive impact across the entirety of our value chain. Our approach aims to address global challenges and ensure that we are at the forefront of our industry. To do this, we have identified four key pillars, which represent the core of our strategy to drive sustainability across our business.



## Responsible production

striving for zero incidents and taking an industry leading approach on the health of our workers and our impact on the environment.



## Carbon neutrality

accelerating the transition to a net-zero carbon economy.



## Value to society

ensuring we have a positive impact on our society.



## Circularity

advancing circular solutions to maximise efficient use of resources and ensure the long-term value of our products.

# Responsible production

As an industry leader, we recognise we must act responsibly. We also believe this responsibility extends across our entire value chain to include suppliers, direct customers and end users.



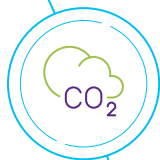
At INOVYN, safety, health and the environment is our top priority above all else. We believe it is our duty to protect and support our employees, contractors and those who live and work in the regions where we operate. We are proud to embed a culture of safety and a philosophy for continuous improvement, which is why we strive for **zero injuries and zero incidents**. Among our objectives in acting responsibly is to work closely with local authorities and regulators, ensuring we comply fully with all applicable laws and regulations. The majority of our sites are accredited to the highest environmental and quality standards. We believe that by working in partnership with our local communities we can increase understanding of our operations, build trust

through open and honest dialogue, address issues and concerns in a timely manner, and continue to make a vital social and economic contribution.

Our commitments also extend to the world around us. We are proud to be a signatory to Operation Clean Sweep®, an international initiative to eliminate the loss of plastic pellet, flake and powder to the marine environment. Beyond this, INOVYN maintains that its suppliers must adhere to our Supplier Code of Conduct, which details our minimum expectations in supplier standards, including health and safety; labour practices and human rights; environmental protection; ethics; and fair business practices.



# Carbon neutrality



The challenge to decarbonise is an unprecedented one that requires global collective action. At INOVYN, we recognise the scale of this challenge, and we welcome it. We believe being at the forefront of research and development with innovative, sustainable solutions can help our industry meet society's needs and progress towards a low-carbon economy.

Our approach in driving carbon neutrality has multiple fronts. **We are:**

## EXPLORING

options to replace fossil feedstocks with bio-sourced options, such as BIOVYN™, delivering a greenhouse gas saving of over 90% compared to conventional PVC.

## PIONEERING

in resource and energy efficiency to provide our customers with a portfolio of products offering best in class eco-profiles that can help them to reduce their own carbon footprint.

## INVESTING

millions of euros in our sites to improve energy efficiency and decarbonise.

## EXPANDING

our production and role in clean hydrogen.

## REUSING

traditional waste products in our system, for example using carbon dioxide to produce sustainable methanol.

## ADVANCING

the use of sustainable fuels and their role in accelerating the development of sustainable transport.

# Circularity



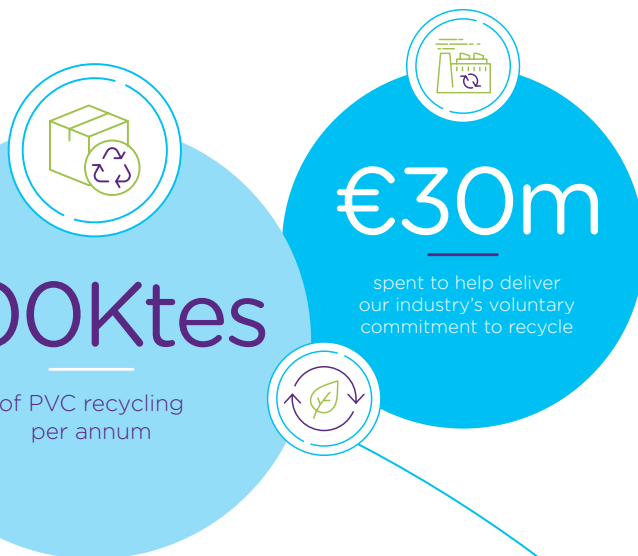
The transition to a fully circular economy is at the forefront of our commitment to sustainability.

We believe that the complex nature of the problem means that the challenge is best approached through a **collaboration** between industry and other organisations across our value chain.

For example, we have embarked on several projects to develop solutions within our own portfolio and over the last 20 years. We have also invested more than €30million to help deliver our industry's voluntary **commitment to recycle** over 1 million tonnes of PVC by 2030 through VinylPlus®. RecoVinyl®, the facilitator

of the VinylPlus® programme has, through over 150 recyclers and converters across Europe, managed to achieve nearly 800Ktes of PVC recycling per annum and accounts for approximately 30% of all recycled PVC in Europe.

Whilst mechanical recycling is currently the most effective way to recycle most PVC, we are also pursuing other **innovative technologies** to increase the circularity of hard-to-recycle PVC and legacy additives.





# Value to society



The products we make are essential for modern day life, helping keep people healthy, safe, warm, housed and connected.

We aim to continue **supporting society** by providing products that **improve global living standards**. As a commercial enterprise we also understand we have the moral responsibility to give back and to continue adding value to society.

The COVID-19 pandemic has demonstrated how fundamentally essential it is for businesses, communities and local governments to work together on key societal challenges. INOVYN, as part of the INEOS group, produces almost 300 different products that are being used for vital drugs, testing kits, ventilators and protective equipment in the fight against COVID-19.

**Innovation** plays a key role in how we see INOVYN contributing to a safer, more sustainable society. INOVYN has launched **over 40 new products** to market in the last 10 years, including working on ground-breaking programmes. These programmes play a key role in advancing progress towards societal

challenges. These include developing the core structure of lightweight; durable and energy efficient PVC wind turbine blades; very low carbon footprint automotive interiors and highly performing pharmaceutical packaging.

Every three years, we are proud to host the **INOVYN Awards** – a global competition celebrating the best new innovations in vinyl worldwide and to recognise those at the very forefront of innovation. The theme for INOVYN Awards 2019 was to recognise achievements in innovation across sustainability; design; processes; and new product development.

**A record 93 projects from 20 countries entered** INOVYN Awards 2019, of which over 40% were focused on **sustainability**, including pharmaceutical blister recycling and adapting PVC elements as furniture and equipment for young neurological patients.





## KEY STORIES

# INOVYN invests

## over €1 billion across its sites

“Investing in our assets is at the heart of what we do, and in the last five years, we have invested over €1 billion in projects related to safety, sustainability and innovation.”

**Geir Tuft, CEO**

To ensure our sites continue to be at the forefront of delivering essential products in the safest and most sustainable way, we have made significant asset investment into a range of safety, environmental and innovation projects. Not only do these continue to protect our workers and the communities we operate in, but also to **reduce our impact on the environment** and accelerate the transition to carbon neutrality.

We strive to take an industry leading approach to safety. To reduce the risk of life changing injuries from falls, we have invested millions of euros on fall protection across our sites. These investments have potentially saved lives and are testament to the **safety first culture** that is at the heart of everything we do.

Over the past five years, INOVYN has made substantial investments in new mercury free membrane cell rooms to continue to deliver continuous improvements and ensure the longevity

of our sites. The membrane cell rooms ensure our products are more sustainable, use less energy and are safer for the communities we operate in.

Protecting the environment is paramount to our operations. The intrinsic relationship PVC has in delivering safe drinking water means protecting marine life is essential to us. As part of **Operation Clean Sweep®**, we have invested significant capital and resources in containment projects across our sites to ensure we go above and beyond the requirements of the initiative.

On top of investing in our assets, we have also made our R&D centre in Jemeppe, Belgium a world-class hub for PVC innovation. The centre is a significant investment and is fundamental to being at the forefront of new product development, sustainable production processes and to achieving our ambitious business expansion plans.

We recognise and support the changing environmental and regulatory framework, and we aim to be ahead of the curve by investing in a range of projects that improve air quality, reduce our water use, and reduce air emissions.





## KEY STORIES

# Embedding our philosophy & culture of safety



Since the inception of INOVYN in 2015, we have reduced our work-related total employee Recordable Injury rate by almost 70% and our contractor rate by 80%. At the heart of our management of safety are the “20 Principles”, which set both standards and best-practice for both personal (behavioural) safety and plant operational (process) safety.

We are proud of the progress we have made to improve and adapt, ensuring **we have an industry leading approach to safety.**

Safety is the cornerstone of our business and is in every action we take, whether it be day-to-day tasks or long-term development projects.

Performance against these principles is audited on every site, and any gaps or opportunities for improvement are logged, actioned and incorporated into a robust corporate action management system.

## KEY STORIES

“INOVYN, through the diligence and focus of every employee, has made an outstanding improvement to our safety performance. In true INEOS fashion, teamwork, collaboration and attention to detail has made us an industry leader when it comes to safety.”



**Paul Daniels,**  
Operations Director



An extremely important element of our **safety culture** is the full and open reporting of incidents and near misses. These reports are seen as a great opportunity to learn and understand how we can improve and prevent potentially more serious incidents through a combination of positive actions and raised awareness. Our process of dissemination to the whole workforce (including contractors) of ‘What Why Learnings’ from the investigation of these reports has proven to be invaluable.

Transparent performance is delivered via a fully communicated suite of INOVYN safety KPIs reported at group and site level. In addition, all employees have a **personal safety improvement** objective

in their annual objectives to maintain the focus on preventing all injuries.

Another important factor in assuring safety is having clear rules for the most important activities. Our “**Life Saving Rules**” capture in a simple way the most critical dos and don’ts for people on our sites to ensure they stay safe and avoid the most serious risks. INOVYN has a zero-tolerance approach to non-compliance with these clear rules.

INOVYN also invests a significant proportion of its revenue on Capital Expenditure purely focussed of safety improvement with projects arising from learning, best practice and the results of detailed studies into how to improve our processes.





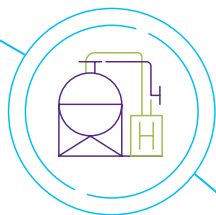
## KEY STORIES

# INOVYN launches hydrogen business



As Europe's largest operator of electrolysis, we intend to use our expertise and existing hydrogen capacity to develop key markets and accelerate the transition to net-zero. Our capabilities in operating safe, reliable assets as well as handling and storing hydrogen will enable us to effectively facilitate the use of hydrogen as a clean and flexible energy solution. Using **clean hydrogen**, our objective is to **cut CO<sub>2</sub> emissions** across INEOS sites and other European industries. In line with our belief of strength through collaboration, we welcome partnerships as we navigate through this new and exciting field.

"INEOS is uniquely placed to play a leading role in developing these new opportunities, driven by emerging demand for affordable, low-carbon energy sources, combined with our existing capabilities in operating large-scale electrolysis." **Geir Tuft, CEO**



In November 2020, we launched a new Clean Hydrogen Business to accelerate the drive to net-zero carbon emissions, providing concrete action to support targets set out by the Paris Agreement and national governments around the world.

## KEY STORIES



“INOVYN’s role will be to provide a place to store the hydrogen in vast quantities – only then can the network cope with changes in supply and demand. The project is a game-changer and will provide a lasting legacy for generations to come.”



**Wouter Bleukx,**  
Business Manager Hydrogen

We are planning to build a **clean hydrogen** supply hub at our site in Rafnes, Norway. A 20MW electrolyser will produce green hydrogen, powered by zero-carbon electricity, leading a reduction of at least 22,000 tonnes of CO<sub>2</sub> per year. This investment will bring us one step closer to **reducing the carbon footprint** of INEOS’ operations in Norway and will serve as a hub to supply hydrogen to the Norwegian transport sector.



**22,000**

tonne reduction in  
CO<sub>2</sub> per year

Within the UK, INOVYN plays a vital role in HyNet, a seven strong consortium working together to transform the North West of the UK into the world’s first low carbon industrial cluster. HyNet will play a critical role in the UK’s transition to ‘net-zero’ greenhouse gas emissions by 2050 and the **global fight against climate change**.



KEY STORIES

# Decarbonisation

## INVESTMENT AT TAVAUX

We are excited to embark on the journey of decarbonising our sites. Our December 2020 announcement of a major investment in Tavaux, France, to decarbonise its solid salt process demonstrates our commitment to carbon neutrality.

The site produces **more than one million** tonnes a year of essential chemicals through the electrolysis of brine, supplying raw materials for a wide range of essential applications including PVC for blood bags, medical equipment and personal protective equipment used during the ongoing COVID-19 pandemic.

This investment delivers a major improvement in the **energy efficiency** of our Tavaux operations by converting its brine concentration process to run on steam produced from electricity rather

than gas, ultimately delivering a reduction in primary energy consumption of over 200 GWh and a reduction in CO<sub>2</sub> emissions in excess of 60,000 tonnes per year. This emission reduction is equivalent to taking 40,000\* cars off the roads each year.

\*ACCORDING TO EUROPEAN AVERAGES:  
Average emission for a vehicle: 122.4 gr CO<sub>2</sub> / km  
& Average km travelled per year: 11,879km



“This significant investment demonstrates the importance of the Tavaux Site as part of INOVYN’s overall sustainability strategy, which includes a move towards a low carbon economy. The new unit will allow INOVYN to significantly reduce its carbon footprint at Tavaux, building on other sustainability improvements at the site.”



**Filipe Constant,**  
Business Director



## KEY STORIES

# BIOVYN™: replacing fossil fuels with biomaterials

In October 2019, we launched BIOVYN™ – the world's first commercially produced bio-attributed PVC that uses a supply chain fully certified by The Roundtable on Sustainable Biomaterials (RSB).

BIOVYN™ is a specialist grade of PVC made using a renewable feedstock derived from wood-based residue from sustainable forestry. It delivers a **greenhouse gas saving of over 90%** compared to conventionally produced PVC as certified by RSB.

Manufactured firstly at our Rheiberg site, Germany, and later at our Jemeppe site, Belgium, BIOVYN™ is made using **bio-attributed ethylene**, a renewable feedstock derived from biomass that does not compete with the food chain. INOVYN's choice of an RSB-certified feedstock also demonstrates its commitment to working

within the emerging bioeconomy, adding to the extremely strong sustainability credentials of BIOVYN™.

INOVYN made its first deliveries of BIOVYN™ in December 2019 to Tarkett, who sourced BIOVYN™ for a new sustainable flooring collection launched in 2020. Our collaborative approach with both upstream producers, such as our sister company INEOS Olefins & Polymers North and UPM – the supplier of the bio-naphtha; as well as downstream customer Tarkett shows that solving complex problems through a collaborative approach is the best way forward.



BIOVYN™ delivers a carbon footprint reduction of over

**90%**



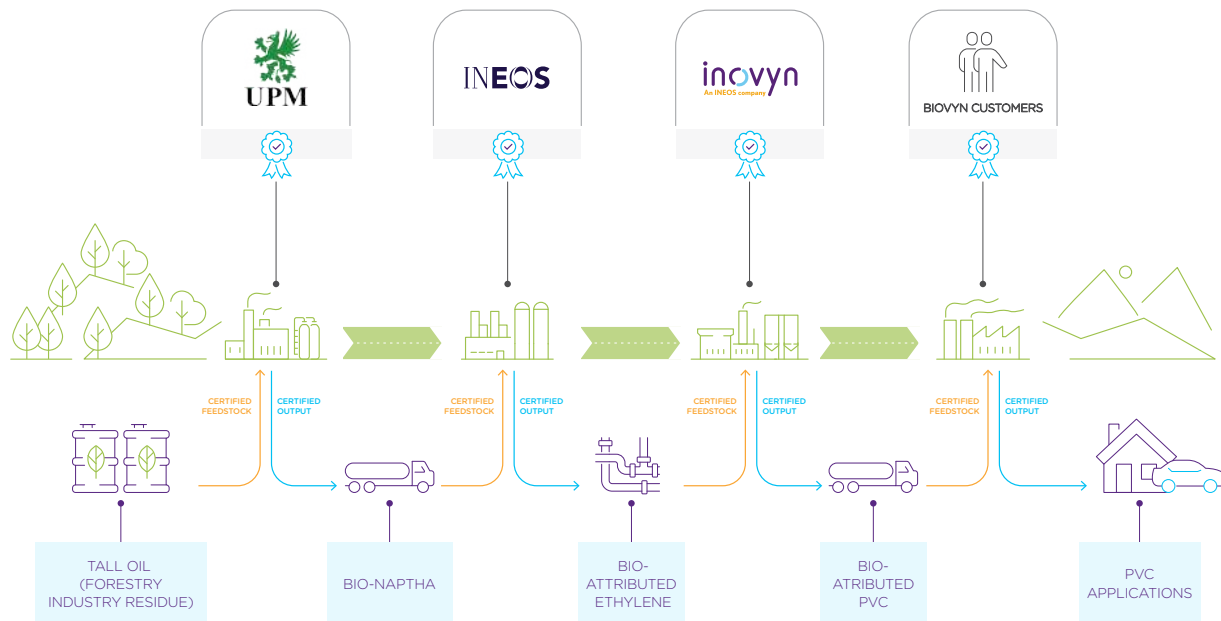


## KEY STORIES

“BIOVYN™ demonstrates that we can substitute the use of virgin fossil feedstocks without compromising the unique product qualities such as durability, flexibility and recyclability that make PVC one of the most widely used, sustainable plastics in the world. It is also a major step forward in INOVYN’s journey to sustainability and demonstrates our commitment to developing innovative solutions that address society’s needs.”



**Julie Taylorson,**  
Procurement Director





## KEY STORIES

# Strengthening partnerships: The Hope Project

We were delighted to announce our partnership with PipeLife Sweden in September 2020 to provide sustainable PVC pipes made using BIOVYN™ to 'The Hope Project'.



The Hope Project, developed by Gothenburg City, is the construction of a 'fossil-free' primary school as part of the City's long-term climate strategy. It uses various sustainable processes and materials in its construction and aims to bring together a range of **sustainability experts, innovators, entrepreneurs and suppliers** to deliver a **truly sustainable community building**.

"BIOVYN™ is the perfect material for this initiative. It builds on the excellent pedigree of conventional PVC, taking it to the 'next level' by removing fossil fuels from its production. It therefore fits perfectly with the key criteria set by Gothenburg City, which is to reduce its consumption-based greenhouse gas emissions by 75% by 2050."

**Inna Jeschke, Business Unit Manager Polymers**



PVC is well established as the material of choice for pipes thanks to the many benefits of such a versatile polymer over other materials such as clay, concrete and metal. PVC pipes are safe, highly durable (over 100 years), sustainable and recyclable, which makes them perfect for an extensive variety of domestic and industrial applications including drinking water, irrigation, sanitisation, electric cable protection and fire sprinklers. BIOVYN™ delivers the same safety, durability and recyclability as conventional PVC but delivers a **greenhouse gas saving of over 90%** compared to conventionally produced PVC as certified by The Roundtable on Sustainable Biomaterials (RSB).



## KEY STORIES

# Supporting the fight against COVID-19

We are proud to be helping to tackle every step in the fight against COVID-19, from sanitation through to the rollout of a vaccine.



INOVYN PVC products find use in almost every aspect of modern society, supplying raw materials for a wide range of essential applications including construction, water treatment and **healthcare**. This includes producing PVC used for medical equipment, personal protective equipment (PPE) and the construction of medical facilities – vital especially throughout the ongoing COVID-19 pandemic.

We **joined forces** with the Michel Cremer Foundation in May 2020 to supply up to 10,000 much-needed PVC face shields for front-line health workers in hospitals across

Belgium and Europe. Using 3-D printers and our own range of copolymers, we produced PVC headbands at our R&D laboratory in Jemeppe, Belgium, to be attached to transparent PVC sheeting and create face shields that help to protect front-line workers in the fight against COVID-19.

PVC used in flooring, ceilings and wall coverings helps to prevent the spread of infection with its easy-to-clean, hygienic surface. Medical facilities such as vaccination centres require building materials that can be quickly installed, with strong durability and chemical resistance. We are proud to be involved in supplying Specialty PVC to flooring manufacturers who use it throughout the UK in the urgent demand to convert existing facilities into sanitary mass vaccination centres.

Our parent company INEOS actively pursued a range of other initiatives to help in the **battle to defeat COVID-19**. This included the production and delivery of up to **600 face shields a week** to NHS hospitals in the UK by INEOS Team UK, along with millions of bottles of INEOS hand sanitiser gel being delivered from 6 new dedicated production facilities in the UK, France, Germany and the USA.



KEY STORIES

# Community care & initiatives



€270,000

donated between May  
and November 2020

As a leading European chemical company, we recognise our responsibility to give back to the communities and regions we operate in. We were delighted to be part of the £1 Million INEOS Community Fund, established by Sir Jim Ratcliffe in March 2020 alongside the Company's Covid-19 Hands On campaign.



Across our European sites, we donated €270,000 between May and November 2020 to essential charities such as The Solan Connor Fawcett Family Cancer Trust; Fundació Residència Sant Joan de Déu de Martorell; Fellesverket Henrys Hus, Infirmieres de la Rue; Hearts4Mercy; Caritasverband Moers-Xanten and Tjejjouren Väst.

"INEOS' generous donation will help ensure that complementary therapy treatments remain a key part of our service offering. Like many charities, in the wake of the pandemic, we've had to put our fundraising plans on hold and adapt new approaches in our work and patient treatments. In these even tougher times, donations are essential in enabling us to support the most essential needs of patients and to really add value to their lives."

**Viv Culleton, CEO for Halton Haven (UK)**

## KEY STORIES

“We know that the positive experiences we have at a young age shape habits for life – which is why it’s so key to help young children enjoy getting active daily. We’re proud that the GO Run For Fun and The Daily Mile initiatives have helped over 2 million children get up and running since 2013 – and are inspiring their families, too.”



**Sir Jim Ratcliffe,**  
Founder and  
Chairman of INEOS



As part of the INEOS Group, we are proud to support the **GO Run For Fun™** and **The Daily Mile™** initiatives that help children develop enjoyable regular exercise habits and educate them about looking after their health and wellbeing.

To date, over 331,000 children have taken part in over 440 events near INEOS sites, with events hosted by INOVYN sites including Northwich, Newton Aycliffe, Runcorn, Rafnes, Porsgrunn, Rheinberg, Rosignano,

Tavazzano and Tavaux. Supported by over 10,000 volunteers, many of whom are site employees, INOVYN looks forward to being able to continue to support these events once it is safe to do so. We also support The Daily Mile™, which currently has over 3.1 million children in around 80 countries across the world committed to running a mile a day – with a total of over 12,000 schools and nurseries taking part.







# GRI Disclosures

General, Economic, Environmental & Social

GRI 100s

GRI 200s

GRI 300s

GRI 400s

GRI Index



## GRI 100s

# Organisational

GRI 102-1

### Name of the Organisation

#### INOVYN

GRI 102-2

### Primary brands, products and services

INOVYN is a wholly owned subsidiary of the global chemicals and consumer products group INEOS. Our portfolio consists of an extensive range of products grouped into 5 key Business Units: General Purpose Vinyls, Specialty Vinyls, Organic Chlorine Derivatives, Chlor-Alkali and Hydrogen.

Our products are used in some of the most demanding applications and are fundamental raw materials for industry sectors as diverse as automotive; power generation; building and construction; paints and adhesives; food; healthcare and medical; personal care; pulp and paper; textiles; clean energy; and water treatment.

Our products are being used on the front-line, to help Europe respond to the ongoing COVID-19 pandemic.

Both the World Health Organisation and UNICEF acknowledge the effectiveness of chlorine in killing COVID-19.

But it does not stop there. Sodium hypochlorite made by INOVYN is also effective when used for hospital disinfectants, whilst our caustic soda helps make soaps and detergents. Chlorine, methylene chloride, allyl chloride and epichlorohydrin all find key applications in the production of pharmaceuticals, whilst hydrochloric acid, salt and sulphuric acid help to keep water clean and safe.

Our specialty grades of PVC are used in the production of blister packs for medicines and vital hospital equipment – including blood bags, protective gloves, surgical gowns, aprons & boots through to tents for temporary treatment facilities – whilst general purpose PVC helps to make much-needed oxygen masks, ventilator tubes, goggles, face shields and other protective clothing for front-line medical staff.

In almost all our product groups, we are the largest producer in Europe. We consistently rank among the top three global manufacturers, and we are at the forefront of new product and process development across our industry.

GRI 102-3, 102-4

### Headquarters' location (Core)

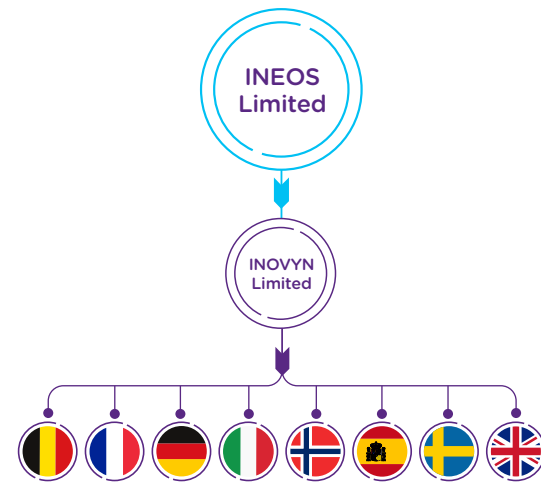
### Location of operations (Core)

INOVYN is headquartered in London, UK, with manufacturing operations in **Belgium, France, Germany, Italy, Norway,**

**Spain, Sweden** and the **UK**. We also maintain regional offices in Runcorn, UK and Evere, Belgium.

### Ownership and legal form

The ultimate parent company of INOVYN is INEOS. INEOS is led by its founder and Chairman Sir Jim Ratcliffe and co-owners Andy Currie and John Reece. It operates a federal structure based on clear reporting lines and direct accountability. Each business, including INOVYN, is managed largely autonomously by its own Executive directors.

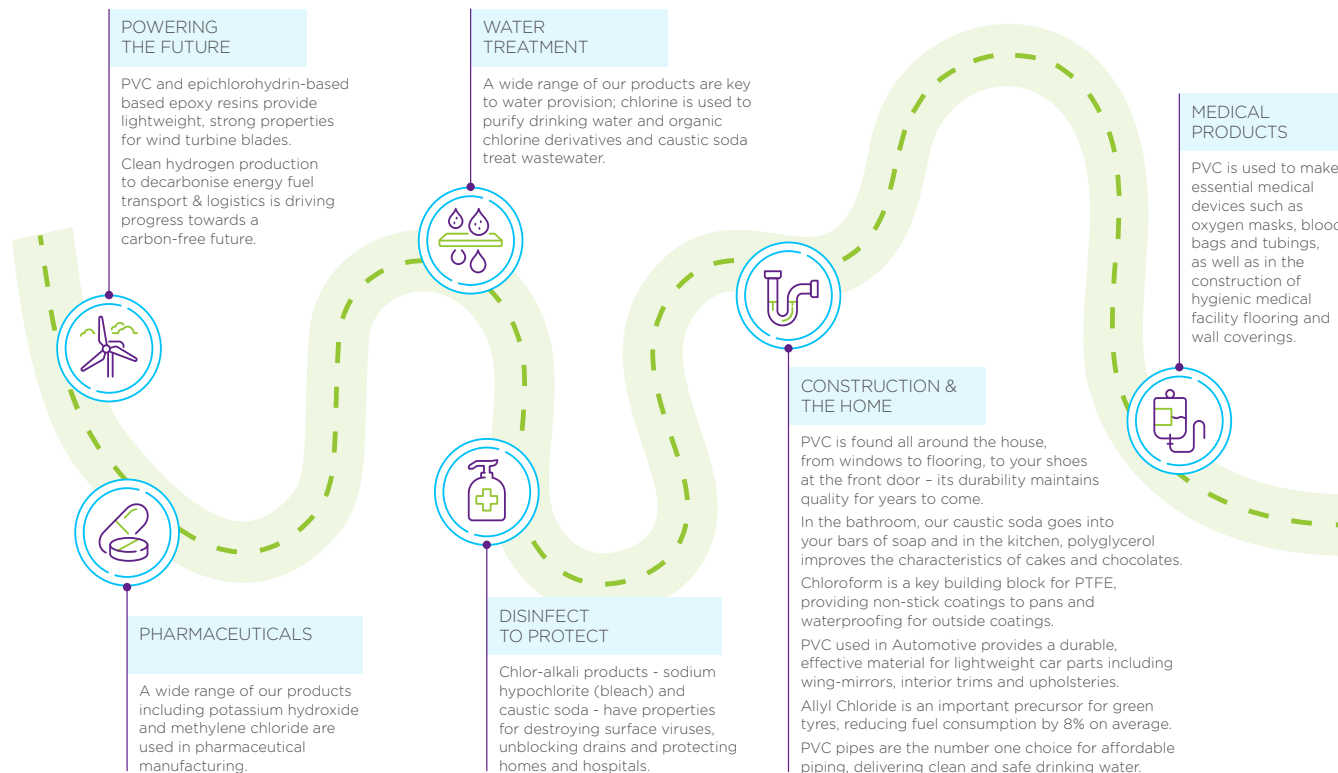




GRI 102-6

## Markets served (Core)

INOVYN supplies over 2,800 customers in 125 countries. Our portfolio serves several chemical markets such as General Purpose Vinyls, Specialty Vinyls, Organic Chlorine Derivatives, Chlor-Alkali, Hydrogen and Vinyls Technologies. INOVYN's strengths across its extensive chlorvinyls activities creates a world scale business that continues to serve its customers and rapidly respond to changing global markets.





## GRI 102-7

## Scale of organisation

INOVYN has over 4,200 employees and operates 15 large-scale manufacturing sites in 8 countries across Europe. Our commercial production volume is around 10 million tonnes per annum with an annual turnover of €3 billion as of 2020.

## GRI 102-8

## Information on employees

As of 31 December 2020, INOVYN employed in total 4,201 permanent and fixed term employees. Of these, 4,195 were based in Europe, 3 in the United States and 3 in China.

As of 31-12-2020, 97% of all approved positions within INOVYN were occupied by an INOVYN employee on either a full-time (93%) or part-time (4%) contract. The remaining 3% of positions were either vacant or occupied by contractors / agency workers.

	PERMANENT		FIXED-TERM	
	MALE	FEMALE	MALE	FEMALE
Austria	1	1	0	0
Belgium	695	118	34	5
China	3	0	0	0
France	716	63	14	11
Germany	385	36	16	0
Italy	180	29	5	1
Netherlands	4	0	0	0
Norway	241	62	24	5
Portugal	3	0	0	0
Spain	264	31	11	4
Sweden	245	69	3	2
UK	709	169	29	10
USA	1	2	0	0
<b>TOTAL</b>	<b>3,447</b>	<b>580</b>	<b>136</b>	<b>38</b>

## GRI 102-9

## Supply Chain





Within INOVYN's supply chain, suppliers are arranged according to four procurement categories:

- Energy
- Feedstocks and Raw Materials
- Logistics
- Technical Services and Goods

In 2020, we spent in the region of €2 billion across approximately 6,500 predominately European suppliers. The number of (suppliers) and spend split by category is as follows:

SUPPLIER CATEGORY				
Energy	NUMBER	% NUMBER	€ MILLION	% SPEND
	93	1	395	19
Feedstock & Raw Materials	NUMBER	% NUMBER	€ MILLION	% SPEND
	340	5	865	43
Logistics	NUMBER	% NUMBER	€ MILLION	% SPEND
	561	9	315	16
TS&G	NUMBER	% NUMBER	€ MILLION	% SPEND
	5,504	85	453	22
<b>TOTAL</b>	<b>6,498</b>	<b>100</b>	<b>2,028</b>	<b>100</b>



% OF TOTAL NO OF SUPPLIERS					
REGION	TOTAL	ENERGY	LOGISTICS	FS&RM	TS&G
 EU 27	75.7%	0.8%	6.8%	4.2%	63.9%
 UK	15.9%	0.4%	1.0%	0.6%	13.9%
 Norway	7.1%	0.2%	0.7%	0.2%	6.1%
 ROW	1.3%	0.0%	0.2%	0.2%	0.9%
<b>TOTAL</b>	<b>100.0%</b>	<b>1.4%</b>	<b>8.7%</b>	<b>5.2%</b>	<b>84.8%</b>

## GRI 102-10

## Significant changes to the organisation and its supply chain

In January 2021, INOVYN Limited and its subsidiaries repaid their external financing and became part of a larger bank group, INEOS Quattro, including INEOS Styrolution, Aromatics and Acetyls businesses.

## GRI 102-12

## External initiatives

We are proud to support and actively participate in a range of industry sustainability initiatives, including:

### VinylPlus®

INOVYN is one of the founding partners and single largest contributor to VinylPlus®, the Voluntary Commitment of the European PVC industry. Launched in 2011, the VinylPlus® programme provides a long-term framework addressing five key challenges to ensure the continued sustainability of PVC. A new 10-year voluntary commitment of the industry was launched in 2021 focussing on progress towards a fully circular future for PVC with the aim of recycling 50% of all PVC waste by 2040.

### Operation Clean Sweep®

INOVYN is a signatory to Operation Clean Sweep® (OCS), the voluntary industry pledge, which aims to achieve zero plastic pellet and powder loss from manufacturing plants to the environment. By signing the OCS pledge, we recognise the importance of preventing any leakage. INOVYN has committed to integrating OCS principles across its entire operations. This includes carrying out regular site audits; internal procedures; containment systems and employee equipment review; developing training plans; and implementing them, as well as prevention, containments and clean up procedures. INOVYN encourages all its partners to participate in the programme.

## The Roundtable on Sustainable Biomaterials

The Roundtable on Sustainable Biomaterials (RSB) is a global, multi-stakeholder independent organisation that runs the world's most trusted, valued and peer-reviewed standard for the sustainable bio-based and circular economy. INOVYN and its sister companies INEOS Olefins & Polymers Europe and INEOS Styrolution were the first chemical and polymers producers to achieve RSB certification to their Advanced Products Standard.

INOVYN is accredited to RSB in relation to BIOVYN™, the world's first commercially available bio-attributed PVC. As a full member of RSB, we are part of a worldwide movement of businesses, NGOs, academics, governments and UN organisations that demonstrate their commitment to best practice for sustainable biomaterial, biofuels and biomass production.

### EcoVadis

INOVYN is rated annually by EcoVadis, the world's leading sustainability ratings provider. We are delighted to have achieved Gold Merit status for a third consecutive year in relation to EcoVadis's independent assessment of our environmental and labour practices, ethics and supplier sustainability.

### Responsible Care®

We are a signatory of the chemical industry's Responsible Care® initiative, which goes beyond legislative and regulatory compliance – committing itself to improve the environmental, health and security performance of our industry. We have implemented the principles of Responsible Care® across our operations, and we encourage all our partners to follow suit.





### The Natural Step

The Natural Step International (TNS) is a sustainable development leader that engages organisations to take concrete action towards ecological, social, and economic sustainability. INOVYN has been associated with TNS for over 20 years. TNS developed a scientific, systemic and strategic approach, coined the 'Framework for Strategic Sustainable Development' and the 5 key its sustainability challenges of VinylPlus® are based on its framework.

GRI 102-13

### Membership of associations

INOVYN makes a significant investment in external associations, both in terms of financial support and INOVYN employees' time and expertise:

### European associations

#### PlasticsEurope

PlasticsEurope is the leading European plastics trade association representing more than 90% of all polymer production across Europe. INOVYN is among more than 50 other member companies that support its many activities including the circular economy, health and safety, marine litter, life cycle thinking and innovation. We fully support PlasticsEurope's "Plastics 2030" Voluntary Commitment to achieve a fully circular and resource efficient Europe.

### The European Council of Vinyl Manufacturers (ECVM)

The European Council of Vinyl Manufacturers (ECVM) represents the six leading European PVC resin manufacturers, including INOVYN. Together accounting for around 75% of the PVC resin manufactured in Europe. ECVM is a division of PlasticsEurope and represents the collective voice of the European vinyl producers in Europe whilst also making a significant contribution to the VinylPlus initiative.

#### EuroChlor

EuroChlor represents the interests of European chlor-alkali producers and INOVYN is among 38 other members. The responsibilities of EuroChlor includes the promotion of best practice in safety, health and environmental protection, and encouraging the economic and social benefits of chlor-alkali products and the many industries that rely on them. We support EuroChlor's 'Mid-Century Strategy', which focuses on achieving the industry's vision of a safe, competitive, climate neutral and circular industry.

#### National associations

We are also members of numerous national and regional associations focused mainly on individual product groups such as PVC, chlorinated derivatives and hydrogen.

## 2. Strategy

GRI 102-14, 102-15

### Statement from senior decision maker Key impacts, risks and opportunities

For our senior decision maker statement, please see the welcome from our CEO, Geir Tuft on page 2.

## 3. Ethics and Integrity

GRI 102-16

### Values, principles, standards and norms

INOVYN is committed to upholding the highest ethical standards and we complies fully with all relevant local, national and international laws. Our Compliance Manager, through our General Counsel, has a reporting line to our Executive Team, which has ultimate oversight of compliance.

We remain committed and uncompromising on maintaining safety, health and the environment as our first priority. Consistent with the wider INEOS group, our Code of Conduct sets out our expectations on Safety, Health & the Environment; Competition & Sanctions; Governance; Dealing with Governments and Political Activity; Financial Integrity and Company Assets; Human Resources and the



use of Digital Systems & Security. It is available in 18 languages and is accessible on the [INEOS website](#).

In accordance with our commitment towards zero incidents, we have robust policies in place to protect employee and contractor health and safety. Wherever we work, we follow all equal pay and relevant working hours directives.

INEOS Group, of which we are a part, publishes its annual Modern Slavery Transparency Statement following the UK Modern Slavery Act 2015. To maintain awareness and ensure a high level of understanding of the risks of modern slavery and human trafficking across our businesses, we have trained relevant employees and our Anti-slavery Policy is available to all staff. We never use child, forced, bonded or involuntary labour and are committed to preventing slavery and human trafficking throughout our supply chain, including subcontractors and suppliers.

The INEOS Supplier Code of Conduct is the foundation of our supply chain management and establishes our basic guidelines and criteria for supplier standards, including labour and human rights practices, health and safety, environmental protection, integrity and ethical business practices. We expect all our suppliers, at a minimum, to conform with the Supplier Code of Conduct.



## GRI 102-17

## Mechanisms for advice and concerns about ethics

INOVYN is committed to an environment where open and honest communication is the expectation, not the exception.

We want our employees to feel comfortable in approaching their line manager or management if they believe a violation of Company policy or behavioural standards has occurred. However, we recognise the need for clear and independent mechanisms through which employees can voice serious concerns without fear of reprisal in any form.

Through the INEOS Speak-Up! Service, employees can access an independent third-party helpline and website (NAVEX Global) available in most languages. This service is supported by the INEOS Speak-Up! policy, which is provided on the INOVYN Group Intranet and website in multiple languages.

The INEOS Speak-Up! policy protects the confidentiality of information provided through the portal and employees may choose to identify themselves or to report anonymously, with INOVYN's guarantee that all comments will be heard.

## 4. Governance

## GRI 102-18

### Governance structure

The highest governance body of INOVYN is the Executive Team, comprising the positions of Chief Executive Officer (CEO), Chief Financial Officer (CFO), Business Director, Operations Director, Procurement Director and Human Resources Director. The Company General Counsel and other senior managers may participate in Executive discussions at their request.

## GRI 102-19

### Delegating authority

INOVYN places a high level of importance on the ability of individual business units, sites and functions to take ownership of their own sustainability strategy within the context of INOVYN's Sustainability Strategy. As such, Business Managers, Country Managers and Procurement Managers drive decision making under the guidance of the Executive Team.



## GRI 102-20

## Executive level response for economic, environmental & social topics

Sustainability is at the heart of INOVYN's strategy, with ultimate responsibility resting with our CEO and the Executive Team. During regular reviews the Executive receives relevant updates from functional areas on environmental, social and governance matters.

All Executive members regularly review and monitor the Company's performance in terms of safety, health and the environment (SHE). We also advocate the responsibility of all employees to uphold our principles.

The Business SHE Manager, who reports directly to the Operations Director, is the primary Executive liaison on safety, health and environmental performance with responsibility for ensuring the accurate reporting of performance against defined KPIs as well as overseeing investigations into significant incidents. Our Sustainability and Corporate Social Responsibility Manager, who reports directly to the Business Director is responsible for sustainability initiatives and reporting.

Adherence to relevant compliance, governance and social matters is the responsibility of the General Counsel, and where local laws and customs apply, the Country Manager of the relevant region. For matters relating to HR compliance, this is the responsibility of the HR Director.

Functional managers who report directly to Executive members are responsible for advancing sustainability performance across all aspects of our commercial activity.

## GRI 102-21

## Consulting stakeholders on economic, environmental & social issues

Investors and other related parties can communicate with our Executive through INEOS Quattro. Feedback is provided through regular interactions between our Investor Relations Manager and the Executive.

## GRI 102-22

## Composition of the highest governance body and its committees

INOVYN is led by a highly experienced Executive team, which brings together a wealth of knowledge leading some of the largest chemical companies in Europe.

INOVYN Limited has five Directors. The Executive team operates as the highest governance body and is comprised six members:

- Chief Executive Officer (CEO) – Geir Tuft
- Chief Financial Officer (CFO) – David Horrocks
- Business Director – Filipe Constant
- Operations Director – Paul Daniels
- Procurement Director – Julie Taylorson
- Human Resources Director – Tony Moorcroft

Apart from the CEO and CFO, all Directors have served on the Executive team since the inception of INOVYN. The Executive is 17% female, with three nationalities represented. Executive members have considerable experience of Environmental, Social and Governance issues, having served as Chairs of several trade associations, as well as Executive members or senior management for a range of listed and private companies.

## GRI 102-23

## Chair of the highest governance body

Our Executive is led by the Chair, independent of the business, who is nominated by INEOS Capital.

The Executive team believes that the separation of the Chairman and CEO roles allows for strong governance and oversight, allowing the Chairman to focus on Executive matters while the CEO focuses on managing the running of our business.



GRI 102-24

## Nominating and selecting the highest governance body

The CEO is appointed by INEOS Capital. Other members of the Executive are nominated by the CEO and confirmed by INEOS Capital.

GRI 102-26

## Role of highest governance body in setting purpose, values, and strategy

Our Executive team sets the purpose, values and strategy of the business. This is reviewed annually by INEOS Capital. We strongly believe in the individual ownership of strategies by the relevant manager and their team. The Executive is responsible for updating INOVYN's purpose, value or mission statements, strategies, policies and goals related to economic, environmental, and social topics.

GRI 102-27

## Collective knowledge of highest governance body

Our Executive regularly participates in sessions aimed at widening their understanding of economic, environmental and social topics. Our strategy team provides regular

Business Intelligence information to the Executive, which is complemented by regular functional strategic reviews, in which relevant information concerning individual functional areas is shared.

GRI 102-29, 102-30, 120-31

## Identifying and managing economic, environmental and social impacts Effectiveness of risk management processes

### Review of economic, environmental, and social topics

Functional areas are responsible for identifying impacts, risks and opportunities that relate to economic, environmental and social topics. These are reviewed annually at both a product group and site level through the Strategic Review process.

Regular monitoring of market trends, upcoming regulations and changes in government policy are carried out at a Business Unit and Site level. For more information on our Executive level risk management of ESG topics, please see [GRI 102-20](#).

GRI 102-32

## Highest governance body's role in sustainability reporting

The Executive reviews and approves the annual Sustainability Report, ensuring material topics identified by our stakeholders are covered in the report.

GRI 102-33

## Communicating critical concerns

Please see GRI 102-17 for information on how employees can raise issues relating to ethical breaches.

Individual directors are responsible for managing critical concerns within their remit. Employees are encouraged to highlight critical concerns to their line manager, who can then take the appropriate action necessary in line with INOVYN policy. The CEO is the key point of contact for INOVYN if there are any concerns that may need to be elevated to INEOS Group level.





GRI 102-34

## Nature and total number of critical concerns

There are no critical concerns as defined by the Executive to report for the reporting period 2020.

GRI 102-35, 102-36

## Remuneration policies, process for determining remuneration

The Executive has a Remuneration Committee and the members of such include the Chairman and the Chief Executive Officer, plus certain members representing INEOS Capital. Each committee seeks the advice of additional members with specific expertise as necessary. The Remuneration Committee meets at least once a year with the primary function to determine remuneration and other terms of employment for the directors and senior employees of the Company. In setting the remuneration policy, the committee considers several factors, including the salaries and benefits available to senior management in comparable companies and the need to ensure senior management commitment to the continued success of the Company by means of incentive schemes.

## 5. Stakeholder engagement

GRI 102-40

### List of stakeholder groups

The relationships we have with our stakeholders are fundamental to our success. We regularly engage with our stakeholders through a variety of channels. Our position within industry associations allows us to engage with stakeholders on key national and international issues.

In 2020, we consulted with our stakeholders on a range of sustainability topics, through our Sustainability Materiality Questionnaire. Our objective was to engage and understand our stakeholders' views. We consulted the following groups:

- Customers
- Suppliers
- National & regional governments
- Non-governmental organisations (NGOs)

- Investors
- Trade associations
- Experts within the field of sustainability

We also engaged a wide range of employees from various job roles, across all regions in which we operate.

GRI 102-41

### Collective bargaining agreements

Where collective bargaining arrangements are in place, our focus is to engage in open and constructive dialogue with employee representatives. In doing so, our aim is to ensure that all joint decisions follow a transparent process and that employees who are represented through such arrangements fully understand the context.















## GRI 102-42 &amp; 102-43

## Identifying and selecting stakeholders & approach to stakeholder engagement






STAKEHOLDER GROUP	METHOD OF IDENTIFICATION	ENGAGEMENT APPROACH
 <b>Employees</b>	All employees are regularly consulted on a wide range of matters. Specific employees were chosen on a regional basis, across a range of seniority levels, by local HR Managers for the purpose of this Report.	Our employees have regular conversations with their managers, both informally and formally through the annual review process. Employees receive communications on a wider range of subject matters including Company strategy and performance, organisation changes, industry developments and specific issues, e.g. COVID-19. The Executive and senior management communicate with employees through regular monthly calls and site visits and employees are encouraged through periodical employee engagement surveys to provide feedback on a range of topics relevant to themselves and INOVYN. Employees are also able to report anonymous concerns through the INEOS Speak Up! Platform.
 <b>Customers</b>	Business Managers for each of our business units define our overall engagement strategy with customers. This methodology is then integrated into our stakeholder engagement process on sustainability.	We engage regularly with customers on a wide range of strategic initiatives, including sustainability. Our sales managers, commercial managers and technical services teams work closely with customers to maintain dialogue. We conduct regular customer surveys to help us to improve our product and service offering. We frequently carry out site visits to our customers for safety, health and compliance audits, and our customers are integral to the safe running of our plants.
 <b>Suppliers</b>	We regularly engage with suppliers on a wide range of topics, with a particular focus on safety, health and the environment. This is managed by Procurement Managers, in conjunction with the Procurement Excellence team. Contractors are subject to the same stringent rules on process safety and training as our employees and all our reporting on safety, health and the environment include our hauliers and contractors where applicable.	We regularly involve suppliers on a wide range of strategic initiatives, including sustainability. We regularly carry out on-site audits of our suppliers for safety, health and compliance purposes, ensuring our suppliers meet the same requirements we expect of ourselves.
 <b>National or regional governments</b>	The communities in which we operate are integral to the success of our business and in many areas we are one of the major regional employers. As such, Country and Regional Operations Managers for each of the countries and regions in which we operate in are responsible for regular interaction between local, regional and national governments.	We interact with local, regional and national governments and commissions on a variety of issues and respond to public consultations regarding new or updated regulation and legislation when applicable. We consult local, regional, national and international governments and commissions when making changes relevant to their jurisdiction, including, but not limited to, modifications to our site, our organisation and mergers and acquisitions.
 <b>Local communities</b>	We regularly meet and work with members of the community to maintain dialogue. In some cases, we participate via Community Advisory Panels and engage widely with local schools, colleges and universities to widen participation in STEM (science, technology, engineering, and mathematics) subjects. As part of the wider INEOS Group, through INEOS Go Run for Fun, The Daily Mile and other charitable initiatives, we regularly engage thousands of children in healthy living programmes.	
 <b>Non-governmental organisations</b>	We regularly engage with NGOs on a range of topics, either directly through our senior management or indirectly through trade associations.	
 <b>Investor or financial institutions</b>	Investor relations for INOVYN are managed by INEOS Quattro who frequently speak to our investors and related parties on a range of economic, environmental and social issues.	
 <b>Trade associations</b>	We actively participate in 16 industry trade associations. Business Unit Managers and Country Managers are responsible for identifying and engaging with relevant trade associations.	



GRI 102-44

## Key topics and concerns raised

The below topics are the three key topics by materiality score by various stakeholder groups.

					
TOPIC	Employees	Customers	Suppliers	National or regional governments	Non-governmental organisations
CIRCULARITY					x
COMPLIANCE WITH LAWS & HUMAN RIGHTS	x	x	x		
ECOLOGICAL IMPACTS				x	
ECONOMIC PERFORMANCE	x				
EMPLOYEE HEALTH & WELLBEING		x	x	x	
PRODUCT STEWARDSHIP					x
STRIVING FOR ZERO INCIDENTS	x	x	x	x	
THE LOW CARBON & HYDROGEN ECONOMY					x



## 6. Reporting practice

GRI 102-46

### Defining report content and topic boundaries

We strongly believe in environmental, social and economic factors being key drivers for our business. We aim to be a chemical industry leader in Safety, Health and Environmental Protection, ensuring our products meet and exceed both customers' and wider society's increasing expectations. This Report has been created in line with the Global Reporting Initiative's (GRI) Standards and aims to detail our approach to sustainability, our policies and standards, and our solutions for a sustainable future. The data collected provides an overview of INOVYN and its sustainability efforts, covering the activities of all INOVYN legal entities worldwide.

GRI 102-47

### List of material topics

The materiality assessment identified sustainability topics of significance to our stakeholders, business and value chain. Our first materiality assessment was conducted in 2021, in which we evaluated topics affecting our industry in conjunction with input from leaders across the

Company and considered our impacts on the economy, society and the environment.

We received 216 submissions from employees and 359 submissions from external stakeholders. INOVYN's core sustainability team identified 16 topics that are relevant to our industry and are most important to our stakeholders. The topics have been split into four categories, as shown below.

The results of this assessment can be found on page 7.

#### Health & Safety

- Striving for zero incidents
- Employee health & wellbeing
- Product stewardship

#### Environmental Factors

- Circularity
- Ecological impacts
- Emissions
- Energy consumption
- The low carbon & hydrogen economy
- Waste & marine litter
- Water

#### Social Factors

- Community engagement
- Compliance with laws & Human Rights
- Employee engagement, diversity & inclusion
- Training & development

#### Business Model & Continuous Improvement

- Economic performance
- Value of products to society
- Innovation
- Sustainable procurement

GRI 102-50, GRI 102-51, GRI 102-52

### Reporting period, Date of most recent report, Reporting cycle

The financial information presented in this Report is consistent with the Company's audited consolidated financial statements for the year ended 31 December 2020. This Report has been published in September 2021.

From the publishing of this initial Report in 2021, we aim to report on our sustainability performance on an annual basis.





## GRI 102-53

## Contact point for questions regarding the report

For more information on our approach to sustainability and further actions, please contact: [sustainability@inovyn.com](mailto:sustainability@inovyn.com)

For press enquiries, please see our list of INOVYN Press Contacts published on our website.

## GRI 102-54

## Claims of reporting in accordance with GRI standards.

This Report publishes materials that include a GRI-referenced claim.

## GRI 102-55

## GRI content index

For our GRI content index, please see page 64.

## GRI 102-56

## External assurance

All internal stakeholders accountable for the Company's sustainability programme and performance, including INOVYN's Executive, have validated the content of this Report.





# GRI 200s

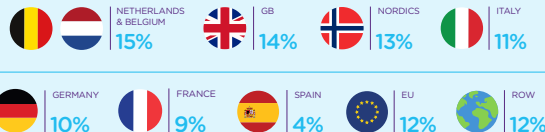
## Economic

### GRI 201-1

#### Direct economic value generated and distributed

	2020 €m	2019 €m	2018 €m
Revenue	2,878.2	3,105.4	3,359.3
Operating profit	408.1	386.0	544.6
Profit for the year	288.7	301.9	385.2
EBITDA before exceptionals	601.1	606.1	691.1
Cash flow from operating activities	517.6	429.0	544.7
Capital expenditure on property, plant and equipment	199.7	240.8	217.6

#### SALES BY REGION | 2020



#### EBITDA before exceptionals by segment

For the purposes of financial reporting, we divide our operations into four businesses:

- **General Purpose Vinyls:** consisting of a portfolio of Suspension PVC products and PVC Resins, and output that we both consume and sell from our interest in the Feyzin cracker.
- **Specialty Vinyls:** consisting of Emulsion PVC and specialty grade Suspension PVC products.
- **Organic Chlorine Derivatives:** consisting of various chlorine derivatives including chlorinated paraffins, chloromethanes, allyl chloride and epichlorohydrin.
- **Chlor-Alkali,** consisting of caustic soda and caustic potash, chlorine and chlorine by-products, brine and water, salt and hydrochloric acid.

Our financial reporting is limited to three Business segments: General Purpose Vinyls, Specialty Vinyls, and Other Chemicals. The Other Chemicals segment includes the Organic Chlorine Derivatives business, plus all products in the Chlor-Alkali business excluding caustic soda and caustic potash. For segmental reporting of EBITDA before exceptionals, the results of the caustic soda and caustic potash products (which are co-produced with chlorine in the electrolysis manufacturing process) included within the Chlor-Alkali operating business are allocated out to the three segments based on the quantities of chlorine contained in each of their products.

The EBITDA before exceptional items attributable to each business segment is as follows:

EBITDA before exceptionals	2020 €m	2019 €m	2018 €m
General Purpose Vinyls	278.7	240.1	306.6
Specialty Vinyls	156.8	156.6	163.0
Other Chemicals	165.6	209.4	221.5
	601.1	606.1	691.1

EBITDA before exceptionals is not a measure of financial performance under IFRS. EBITDA-based measures are non-GAAP measures. We believe that the presentation of EBITDA-based measures enhances an understanding of the financial performance. However, EBITDA-based measures should not be considered in isolation or viewed as a substitute for operating profit, profit, cash flows from operating activities, or other measures of performance as defined by IFRS. These EBITDA-based measures, as used herein, are not necessarily comparable to other similarly titled captions of other companies due to potential inconsistencies in the method of calculation. We calculate EBITDA before exceptional as operating profit before depreciation, amortisation, impairment and net exceptional charges.

#### Reconciliation of EBITDA before exceptional items to operating profit:

	2020 €m	2019 €m	2018 €m
EBITDA before exceptional items	601.1	606.1	691.1
Depreciation and amortisation	(183.8)	(168.5)	(133.7)
Exceptional items within operating profit	(9.2)	(51.6)	(12.8)
Operating profit	408.1	386.0	544.6





## GRI 201-2

**Financial implications and other risks and opportunities due to climate change**

Both climate change itself and associated legislation and regulation have the potential to financially impact our business. We already comply with a range of regional, national and international legislation and regulation.

The EU's proposed Climate Law, the UK Climate Change Act and other associated carbon neutrality legislation could result in increased costs of purchased energy and compliance in impacted locations.

As a European operator, we are also subject to the EU Emissions Trading Scheme (ETS) as well as several other GHG reporting and permitting systems.

We continue to monitor changes to legislation and our sustainability strategy underpins our efforts to achieve carbon neutrality.

Although not possible to accurately forecast, it is reasonable to expect the demands on our business will increase in line with tighter and more widespread industry legislation and regulation. In a broader context, the effects of climate change present a future potential risk to our operations. For example, unseasonal and extreme weather, or changes to water courses and sea levels, could cause disruption to our supply chain.

## GRI 201-3

**Defined benefit plan obligations and other retirement plans**

INOVYN operates a number of Defined Contribution plans and funded and unfunded Defined Benefit pension schemes in Europe, devised in accordance with local conditions and practices. The Defined Benefit plans are funded by payments to separately administered funds or insurance companies. We also operate several unfunded Defined Benefit pension schemes in the UK, Belgium, France, Germany, Italy, Norway, Spain and Austria.

We offer several post-retirement healthcare plans, which provide employees with other post-employment benefits in respect of health care. These plans are unfunded.

As of 31 December 2020, the projected benefit obligation for our pension plans exceeded the fair value of plan assets by €187.5 million. Subject to future actuarial gains and losses, as well as future asset earnings, we will be required to fund this discounted obligation in future years. We contributed €50.4 million and €55.2 million to our Defined Benefit plans in 2020 and 2019 respectively. We estimate that it will contribute €59.3 million to Defined Benefit plans in 2021.

We paid contributions of €17.4 million and €16.2 million in 2020 and 2019, respectively, to Defined Contribution plans. For more information on our pension and other post-retirement benefits see INOVYN Limited's financial statements, note 21.

**205: Anti-corruption****Management approach**

As a global supplier, we are subject to a variety of anti-bribery and anti-corruption laws and regulations, including the UK Bribery Act 2010, the US Foreign & Corrupt Practices Act (FPCA), the Organization for Economic Cooperation and Development Convention on Combating Bribery of Foreign Officials in International Business Transactions, and the United Nations Convention Against Corruption.

In addition, many of the countries in which we operate have specific laws against the bribery of domestic and/or foreign government officials and agents, with which we fully comply. Integrity and ethical business practices are seen as the responsibility of all our employees, agents and business partners.

The INOVYN Anti-Bribery and Anti-Corruption policy comprises the following principles:

- Not to engage in bribery or unethical inducements or payments.
- To abide by laws and regulations relevant to countering bribery and corruption in our day-to-day business practices in all countries in which we operate.
- To subject relevant procedures to on-going risk assessment, monitoring and updating as appropriate to ensure they remain effective and valid in different circumstances.



- To support employees to take decisions that are in line with this policy and to encourage them to seek clarification and guidance in case of doubt.
- To investigate any reports of suspected violations of law, policies and internal control procedures and subject any non-compliance to appropriate sanctions.

## GRI 205-1

### Operations assessed for risks related to corruption

We respect all applicable local, national and international laws and policies and use the Dow Jones Risk & Compliance tool to assess risks related to corruption in the jurisdictions in which we operate. All subsidiaries of INOVYN are audited internally to ensure compliance with anti-bribery and anti-corruption laws.

## GRI 205-2

### Communications and training on anti-corruption

Regular anti-bribery training is provided to all relevant employees (2020: 340 employees), principally those involved in identifying, selecting and managing INOVYN customers, suppliers and agents. All relevant employees are identified by their manager for training assigned as part of their on-boarding. Anti-bribery and anti-corruption form a key part of our Supplier Code of Conduct, with contractors and suppliers expected to comply with the same ethical integrity as INOVYN employees.

## GRI 205-3

### Confirmed incidents of corruption and actions taken

As of 2020, there have been no confirmed incidents of bribery or corruption involving INOVYN employees or occasions where employees have been disciplined or dismissed on such grounds.

Further, INOVYN has not been subject to any claims or investigations of corruption, nor has it terminated any contracts as a result of corruption.

## 206: Anti-competitive behaviour

## GRI 206-1

### Anti-competitive behaviour

We have detailed policies in place to ensure full compliance with prevailing competition law in all regions in which we operate. Regular competition law training is provided to all employees engaged in commercial activities. In 2020, we had no legal actions pending or completed regarding anti-competitive behaviour, violations of anti-trust, or monopoly legislation in which INOVYN was identified as a participant.





# GRI 300s

## Environmental

### 301: Materials

#### Management Approach

INOVYN is one of the largest PVC and chlor-alkali producers in the world. Our products are used in some of the most demanding applications and are fundamental materials for industry sectors as diverse as automotive; building and construction; food; healthcare and medical; personal care; textiles; and water treatment.

Salt and ethane/naphtha, derived from the oil and gas industry are the two key raw materials that are we extract from the earth's crust. The primary inputs to our production processes are salt, water, electricity and hydrocarbons of varying chain lengths. Other raw materials and process aids are used, depending on the production process.

More recently we have launched our bio-attributed PVC utilising renewable naphtha derived from forestry sustainable residue.

For more information see our story on BIOVYN™ on page 20. We take full responsibility for stewardship of our materials and processes, working hard to prevent pellet loss and pollution. We continuously optimise our resource efficiency along all stages of the product life cycle.

#### Recycled and renewable-based materials

In 2019, INOVYN introduced the world's first bio-attributed PVC which has been entirely developed from renewable feedstocks. In this case it is from 2nd generation biomass from the sustainable forestry industry in Scandinavia. Through a bio-reactor process, tall oil derived from wood residues is converted to bio-naphtha, which in turn is cracked to produce bio-ethylene. This is subsequently converted to PVC resin through a mass-balance process known as bio-attribution and has been certified to meet RSB Advanced products standard.



#### Preventing pellet loss at INOVYN

We, as part of the larger INEOS family, have been signatories of Operation Clean Sweep® (OCS) since 2017. At its core, this global voluntary initiative aims to achieve zero pellet loss to the environment. We are proud that all PlasticsEurope member companies have now become OCS signatories and we encourage all of our competitors, partners, suppliers, and customers to sign up to OCS. By signing up to OCS in Europe, we commit to the following six actions:

1. Improve worksite set-up to prevent and address spills.
2. Create and publish internal procedures to achieve zero industrial plastic material loss.
3. Provide employee training and accountability for spill prevention, containment, clean-up and disposal.
4. Audit performance regularly.
5. Comply with all applicable state and local regulations governing industrial plastics containment.
6. Encourage partners (contractors, transporters, distributors, etc) to pursue the same goals.





## 302: Energy

### Management approach

All of our large energy consuming sites are certified to the regional operations' applicable energy management standard. These certifications cover ISO-50001, Energie Beheers Overeenkomst (EBO) in Flanders (Belgium), the Accord de Branche in France and Wallonia (Belgium) and the UK Energy Savings Opportunities Scheme (ESOS).

Energy consumption is continuously monitored through an internal KPI and energy improvement programmes are implemented through our Manufacturing Excellence (MEx) programmes. At INOVYN, we are continuously looking to optimise our energy efficiency, reduce our consumption and increase efficiency of raw materials, energy and water.

### Some notable projects include:

#### ENERGY FROM WASTE

A significant proportion energy at our Runcorn site is supplied by the adjacent Energy from Waste plant, of which INOVYN is a shareholder. This facility, one of the largest in Europe, processes non-recyclable refuse from residual household and commercial waste, generating steam and electricity. The export of heat and power optimises the efficiency of the facility. The energy produced is renewable and low carbon (due to the biomass component and the avoidance of landfill).



## ENERGY EFFICIENCY

We continuously explore and invest in a range of energy efficiency projects across our manufacturing sites that ultimately reduce our carbon footprint. Please see below for several energy-saving projects:

### SOLIBI Antwerp

The SOLIBI project was completed in 2016 and with the scope to increase the hydrogen valorisation of the ECU asset through the construction of a new high pressure compression unit (15,000 Nm<sup>3</sup>/h) by Air Liquide. The INOVYN project scope consisted of an expansion of the existing low pressure hydrogen compression capacity and the supply infrastructure for Hydrogen and utility export to Air Liquide.

### North Star Grenland

The North Star project was commissioned in 2020 and consisted of major debottlenecking activities across both the ECU and VCM assets. This project has reduced steam consumption by 80 Ktes annually.

### New Salt Plant at Tavaux

Replacing the Salt Evaporation plant at our Tavaux site. This project will reduce steam consumption by 360 Ktes annually, reducing CO<sub>2</sub> emissions by 58 Ktes annually. This is equivalent to reducing 16% of the Tavaux footprint. Additionally, this project will reduce overall water consumption by 6%.

## Additional Hydrogen Compression capacity at Rheinberg

Our Rheinberg site previously ran with a bottleneck on Hydrogen Compression meaning that during periods of high load, excess hydrogen was vented. We installed additional compression capacity, by installing capacity we have increased our ability to utilise the clean fuel not increased sourcing 1kt of additional Hydrogen per year, CO<sub>2</sub> emissions to atmosphere have been reduced by 7.5kt annually.

### New Cellroom at Stenungsund

Completed in 2019, the Mercury Cellroom at Stenungsund site was replaced with the membrane technology. The new cellroom achieved a site energy reduction of 45 GWh/yr in addition to the environmental benefits of moving away from mercury technology.

## Big Data and Analytics

We are running a number of pilot projects aimed at utilising Big Data Analytic and Digital technologies to optimise our processes and increase energy efficiency.

GRI 302-1

## Energy consumption within the organisation



## ENERGY

### UNITS

Total Energy Use	gigajoules	48,137,744
Energy Use Intensity	gigajoules per metric tonne of product	4.82
Scope 1 (Energy)	gigajoules	18,810,742
Scope 2 (Energy)	gigajoules	29,327,002

GRI 302-3

## Energy intensity

GRI 302-4

## Reduction of energy consumption

Please see above





### 303: Water

#### Management approach

We strive to use water as efficiently as possible and recognise it as a valuable resource. Water as a resource requires a localised approach due to regional and local conditions. All our sites take full ownership of their water usage. We manage our water use with total accordance to local laws and regulation, allowed limits for discharge destinations and water quality, and our site operations teams ensure compliance with local laws.

Water from our sites can be drawn from multiple sources: seawater, fresh surface water, groundwater, potable water and brackish water. Our sites continuously look for ways to reduce the amount of freshwater withdrawn and opportunities to

reuse and recirculate water in cooling systems. When feasible, we will always treat and reuse waste water on-site. If not feasible, waste water will be sent to a water treatment facility nearby. Water in our industry can be segregated into two uses: process water and cooling water. Process water is used in our production process and makes contact with our products. We always look for opportunities to reuse process water and reduce its discharge of process water. Closed-loop water systems are a common feature of our sites' configuration to support water recycling and optimisation. Cooling water does not make contact with our product, and therefore, can be safely discharged into the environment.

We safely monitor and report our water consumption internally, identifying any opportunities to reduce it. Our sites independently set KPIs on water usage to enable them to set targets and reduce water consumption over time.



#### WATER

##### UNITS

Total Water Consumption	m <sup>3</sup>	19,640,344
Total Water Withdrawal	m <sup>3</sup>	268,856,624
Total Water Discharge	m <sup>3</sup>	256,780,795
Water Consumption Intensity	m <sup>3</sup> per tonne of product	1.965

#### GRI 303-1

#### Interactions with water as a shared resource

#### GRI 303-2

#### Management of water discharge-related impacts

#### GRI 303-3

#### Water withdrawal by source

#### WATER WITHDRAWAL (M<sup>3</sup>)

TOTAL	FRESH SURFACE WATER	GROUNDWATER
268,856,624	154,055,327	35,007,249
POTABLE WATER	SEAWATER/BRACKISH WATER	OTHER WATER
5,791,112	40,632,643	33,374,640

#### WATER DISCHARGE (M<sup>3</sup>)

TOTAL	FRESH SURFACE WATER	GROUNDWATER
256,780,795	117,926,751	14,821,536
POTABLE WATER	SEAWATER/BRACKISH WATER	OTHER WATER
841,555	41,443,978	71,461,364

#### GRI 303-4

#### Water discharge

#### GRI 303-5

#### Water consumption



## 304: Emissions

### Management approach

INOVYN recognises the significant challenges that climate change poses to current and future generations, and we recognise that as a business we have a role to play in tackling those issues. In line with efforts to reduce emissions under the Paris Agreement, we are committed to carbon neutrality by 2050 and endeavour to significantly reduce our emissions through targeted investments over the coming decades. We envision contributions to this will be enabled by innovative technologies, efficiency and optimisation improvements on our plants and increased use of renewable energy.

Our strong footprint in Europe allows us to benefit from globally competitive mixes of renewable energy, such as in Sweden and Norway, allowing us to reduce the emissions from our energy consumption. Whilst investments in our operations have significantly reduced our emissions over the past 5 years, we continue to look further for innovative opportunities to reduce emissions.

We regularly monitor our performance related to energy, emissions, water and waste. Throughout this report, we follow methodologies as laid out by the Greenhouse Gas Protocol.

INOVYN's Scope 2 emissions have been calculated using the dual accounting methods: 'market-based' and 'location-based' in accordance with the GHG Protocol Scope 2 Guidance. The difference between the two arises depending on the emission factor used; whether that is a residual mix factor, a supplier-provided emission factor or a local grid emission factor.

GRI 305-1

### Direct GHG emissions (Scope 1)

GRI 305-2

### Energy indirect GHG emissions (Scope 2)

GRI 305-4

### GHG emissions intensity

GRI 305-5

### Reduction of GHG emissions

GRI 305-6

### Emissions of ozone depleting substances

GRI 305-7

### Nitrogen oxides (NOx), sulphur oxides (SOx) and other significant air emissions

**Emissions**

SCOPE 1

1,060,119 METRIC  
TONNES  
OF CO<sub>2</sub>Scope 2  
(location)1,451,407 METRIC  
TONNES  
OF CO<sub>2</sub>Total Emissions  
(Scope1 + Scope2  
location-based  
method)2,511,527 METRIC  
TONNES  
OF CO<sub>2</sub>GHG Intensity  
(Scope 1&2)  
location-based  
method0.25 METRIC  
TONNES  
OF CO<sub>2</sub> PER  
TONNE OF  
PRODUCTScope 2  
(market)2,227,869 METRIC  
TONNES  
OF CO<sub>2</sub>Total Emissions  
(Scope1 + Scope2  
market-based  
method)3,287,898 METRIC  
TONNES  
OF CO<sub>2</sub>GHG Intensity  
(Scope 1&2)  
market-based  
method0.33 METRIC  
TONNES  
OF CO<sub>2</sub> PER  
TONNE OF  
PRODUCT

Data from 2020

**Other Air Emissions**

METRICS TONNES

METRIC TONNES PER MILLION METRIC TONNES OF PRODUCT

977 NO<sub>x</sub>97.22 NO<sub>x</sub> INTENSITY50.96 SO<sub>x</sub>5.1 SO<sub>x</sub> INTENSITY

239 VOCs



23.93 VOCs INTENSITY



269 CO



26.89 CO INTENSITY



46 PM



4.62 PM INTENSITY



## Waste

TOTAL

159,837

METRICS TONNES

NON- HAZARDOUS  
WASTE111,937 METRICS  
TONNESHAZARDOUS  
WASTE47,928 METRICS  
TONNESWASTE  
INTENSITY0.016 METRICS TONNES  
PER TONNE  
OF PRODUCT

### 305: Waste

#### Management approach

As an industry, we have always taken every opportunity to reduce our waste and find ways to reuse it in our operations. Our Energy Recovery Facility (ERF) is emblematic of that. Since 2017, INOVYN's ERF plant has been diverting waste from landfill and processing it to generate low-carbon energy in the form of electricity and steam.

INOVYN has a robust waste management system in place to monitor and manage our waste. All waste disposal by our sites is managed in accordance with national and local laws and regulations. We continuously explore opportunities to derive value from our waste by reusing waste internally or finding third parties that could use it as a feedstock. All of INOVYN's sites are responsible for setting targets and KPIs related to waste and reducing our waste output.

GRI 306-1

#### Waste generation and significant waste-related impacts

GRI 306-2

#### Management of significant waste-related impacts

GRI 306-3

#### Waste generated

GRI 306-4

#### Waste generated from disposal

GRI 306-5

#### Waste directed to disposal





## 307: Environmental Compliance

### Management approach

We carry out our operations with complete respect towards our local environment. We aim to carefully manage any environmental impacts such as energy, greenhouse gas emissions, water use and waste. We work closely with local municipalities and regulatory authorities who grant us licenses to operate. We seek to gain the trust of local communities by operating responsibly and safely and engaging with communities.

We continuously monitor and evaluate environmental risks and we are committed to acting responsibly and complying with all regulations related to the environment. All our sites regularly carry out environmental risk assessments to manage any environmental impacts. We also aim to operate as efficiently as possible, using resources efficiently, minimising waste and reducing our energy consumption.

INOVYN is signatory to the Responsible Care Charter®, which is the chemical industry's environmental, health, safety and security performance initiative. At its core, the commitment and its principles is a pledge to always improve environmental, health, safety and security performance for all our facilities, our processes and products. By being a signatory to Responsible Care®, we are committing to open and transparent reporting and to undergo facility audits to certify our performance and continuous improvement.

### Management System Certifications

The majority of INOVYN sites in Europe (93%) are certified to the Quality Management System ISO 9001:2015. The majority of INOVYN sites (93%) are also certified to the Environmental Management System ISO 14001:2015. Our sites in Rheinberg, Germany; Stenungsund, Sweden; and Tavaux, France; are all certified to the Energy Management System ISO 50001:2018. Our sites in Lillo, Belgium; Jemeppe, Belgium; and Rosignano, Italy are also certified to the Occupational Health & Safety ISO 45001:2018.

GRI 307-1

### Non-compliance with environmental laws and regulations

We work very hard to minimise our impact on the environment. However, incidents can happen, and when they do we see it as our complete responsibility to meet our obligations to our local community and environment. We diligently investigate each incident to understand what we could do to avoid any future incidents. We ensure that learning is shared throughout the organisation to prevent any further incidents.

### Number of Environmental incidents

Based on the KPI "Incident cat C or D" > having significant effect on environment offsite, requiring report to Authority, breach of consent limits of the permit, incident formally investigated by Authority.

Env. Incident	2015	2016	2017	2018	2019	2020
CAT D	1	0	0	0	0	0
CAT C	8	2	1	0	0	1

### Fines and penalties paid

	2015	2016	2017	2018	2019	2020
Notice by the Environmental Authorities	N/A	N/A	1	0	0	0





### 308: Supplier Environmental Assessment

GRI 308-1

#### **New suppliers that were screened using environmental criteria**

We expect all suppliers to comply with INOVYN's Supplier Code of Conduct which details our expectations related to Safety; Health and Environment; Human Rights & Labour Practices and Business Ethics. Our supplier selection process ensures all new suppliers are informed of the Code of Conduct and requires them to complete a questionnaire to provide further clarity on their health & safety, environmental management, certifications and sustainability policies. Additionally, we have clauses in our standard terms and conditions which set the minimum standards linked to Safety, Health and Environment (SHE) we expect our suppliers to adhere to. INOVYN has the right to terminate any contract if we see that SHE clauses are not fulfilled.

In 2020, we launched an additional supplier questionnaire on Corporate Social Responsibility (CSR), which looks to build on the information obtained via our supplier questionnaire, focussing specifically on our suppliers CSR standards and policies. The additional information gives us more visibility into the sustainability of our value chain. In 2021, we have targeted a selection of our key suppliers with the intent to widen this to all key suppliers in 2022 and all new suppliers in due course.



## GRI 400s

## Social

## Management approach

INOVYN's success as a business is due to its global, talented and passionate workforce. We value the diversity and individuality of our people and are committed to creating an environment where all employees are treated fairly and with respect.

## 401: Employment

GRI 401-1

INOVYN

AVERAGE  
HEADCOUNT

4,197



NEW HIRES

256

HIRE  
RATE

TURNOVER

264

TURNOVER  
RATE

## BY AGE



&lt;30

512

AVERAGE HEADCOUNT

NEW HIRES (139)

TURNOVER (75)



30-50

1,834

AVERAGE HEADCOUNT

NEW HIRES (95)

TURNOVER (54)



&gt;50

1,851

AVERAGE HEADCOUNT

NEW HIRES (22)

TURNOVER (135)

## BY GENDER

618

FEMALE

NEW  
HIRES

57



TURNOVER

55



MALE



3,579

NEW  
HIRES

199

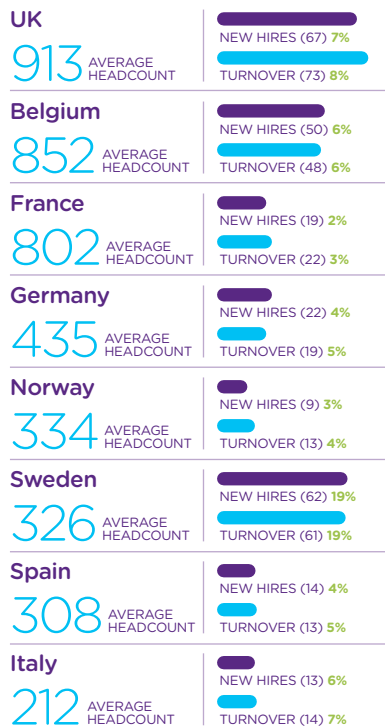


TURNOVER

209



## GRI 401-1 (continued)



## GRI 401-2

### Benefits provided to full-time employees that are not provided to temporary or part-time employees

We want to attract and retain the brightest and most qualified employees, which is why we offer competitive compensation and benefits, including comprehensive training. Our full-time employees receive a wide variety of benefits based on location, applicable national and local laws, and labour or works councils.

In addition to their basic annual remuneration, all employees participate in an annual discretionary Business Bonus Scheme that rewards collective performance against a range of safety and business Key Performance Indicators (KPIs). Safety and asset reliability KPIs are set at site level to encourage local ownership of performance. Financial KPIs are set at Company level. All employees are offered the opportunity to join a private Company pension scheme, which is defined on a country basis according to prevailing national employment legislation.

All employees have the opportunity to participate in a number of preferential discount schemes connected with some of INEOS' brands. All employees have access to INEOS Energy Station, which is a dedicated health and wellbeing hub.

## GRI 401-3

### Parental leave

All employees are entitled to paid parental leave in line with prevailing regional and national legislation. This is in addition to paid maternity leave for new mothers. In addition to paid leave, INOVYN endeavours to support all new parents with parental leave as allowed by applicable national laws and flexible working when they return to work. Beyond that, INOVYN looks to accommodate childcare needs wherever possible, particularly for primary caregivers.

## 402: Labour/Management Relations

## GRI 402-1

### Minimum notice periods regarding operational changes

INOVYN endeavours to be open and transparent with employees and their representatives on significant changes to the Company or its operations that may impact employees. We aim to give as much notice as possible of such changes, however in certain circumstances the timing of such notification may be governed by market or commercial confidentiality. For matters that have transnational impact, there is an agreed notification process that is defined in the legal agreement between the Company and the European Works Council (EWC), which comprises elected employee representatives from all regions.



Matters to be the **subject of information** in the EWC will be those issues that (i) fall within the definition of Transnational Issues and (ii) relate in particular to the following topics:

- the structure and organisation of INOVYN;
- changes to the economic and financial situation of INOVYN; and
- changes to the probable development of the business, production and sales.

Matters that are the **subject of information and consultation** are those issues that (i) fall within the definition of Transnational Issues and (ii) relate in particular to the following topics:

- situation and probable trends in employment;
- ongoing and planned investments;
- substantial changes concerning work organisation;
- the introduction of new working methods or production processes;
- transfers of production and transfers of technology;
- acquisitions and mergers;
- cutbacks or closures; and
- collective or mass redundancies.

The EWC is encouraged to express points of view to INOVYN Senior Leadership on the information provided and are entitled to obtain a reasoned response to such points of view at the time or shortly thereafter. Whilst there is no obligation to run consultations, it is envisaged that INOVYN Senior Leadership will engage in dialogue on such matters. The EWC does not engage in dialogue on any issues that relate to a single country and are purely local/national issues that fall under the decision-making power of the sole national/local management.

## 403: Occupational Health & Safety

GRI 403-1

### Occupational health and safety management system

INOVYN believes and practices the principle that an outstanding and sustainable safety performance is key to a successful business. We adhere to safe parameters in our operations and take our responsibility very seriously. As a part of the INEOS Group, we follow two sets of 10 key safety principles. These 20 principles form the foundation of our safety management system on all our sites and define what is expected of all our employees, contractors and all INEOS businesses.

The nature of chemicals used in our large-scale operations require us to deliver excellence in safety management at all times, which is monitored through our

extensive auditing processes. Our sites regularly undergo training activities and auditing by trained members within our site management and internal audit teams. Our sites exchange best practices across our organisation and INEOS sites to keep safety at the forefront of operations.

During audits, findings related to serious deviations are resolved by immediate corrective actions. Findings related to minor deviations are integrated into the site's annual Safety, Health & the Environment (SHE) improvement plan. These audit processes take place according to a rolling three-year schedule.

The 20 principles are backed up by our Life Saving Rules, a mandatory set of golden rules for all employees and contractors. This is coupled with our "near miss" reporting system for all employees, designed to capture issues or circumstances that may lead to unsafe conditions if left uncorrected.

All our site managers review the site performance to deliver an annual letter of assurance to the chairman of the Company confirming compliance with all safety rules, potential fines for non-compliance and regulator intervention.

In line with all businesses of the INEOS Group, the INEOS Group Guidance Notes rules for Permits to Work, Inspection of Equipment, and Management of Change (MoC) are adhered to. Learnings from any incidents are communicated across the Company through a system of alerts.

Each site reports health and safety performance monthly to the Executive Committee, where our Chief Executive





has ultimate accountability for performance. Further oversight is provided at an INEOS Group Level, whereby the shareholders of INEOS are updated on SHE performance at business and functional board meetings as well as through our letter of assurance process that requires each business to provide an annual report.

#### GRI 403-2

### Hazard identification, risk assessment and incident investigation

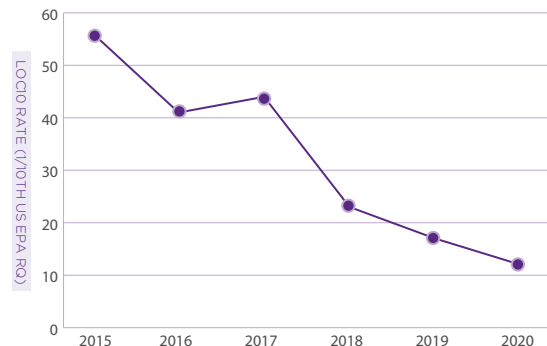
Our SHE programme specifies how we operate our manufacturing processes in a safe manner to avoid losses of containment of hazardous chemicals to the environment. In addition, we continuously develop our processes to reduce the fugitive losses to atmosphere.

Specially trained engineering teams review the design of new and existing plants to ensure that all operational modes on start-up, normal production and plant shut down can be carried out in a safe manner. All plant operating parameters, alarm settings and automatic shutdown systems are set and reviewed on a regular basis to ensure safe plant operation. Learnings from process safety incidents across the whole of INEOS are shared to avoid incidents on other sites.

All sites are covered by Seveso II regulations and each site must prepare a safety case for regulator review on a regular basis.

We are required to report any loss of containment (LOC) events that occur at our production sites that are above

release thresholds equal to 1/10th the U.S. EPA reportable quantity (RQ) threshold, as a process safety and environmental impact indicator.



The primary focus of our process safety programme is to prevent or mitigate the unplanned or uncontrolled release of hazardous chemicals. We aim to prevent the occurrence of any incidents and to protect our neighbours and the environment. We have clear standards for identifying and managing process safety risks within our Operational Excellence framework. Regular turnarounds during which we shut down plants and carry out essential maintenance, upgrades and safety checks are a key part of our safety programme. In 2019 we introduced a KPI to monitor INOVYNs process safety performance and measure improvement in this vital area. The KPI is derived from a range of leading and lagging indicators of our performance. The leading indicators

focus on audits and how well we are delivering improvement actions which also include insurance property risk recommendations. The lagging indicators focus on process safety related incidents but most importantly on how well we are implementing actions arising from the investigations into the cause of these incidents. Improvement is driven by setting a challenging target for risk reduction year on year.

A set of INEOS Group Guidance Notes has been developed to ensure that all INEOS Group businesses have high standards for the identification and mitigation of process safety risks. It is a requirement that all sites have a documented Management of Change system that defines all SHE, operational, technical, quality and financial aspects prior to, during and after the implementation of a change in an existing plant. The MoC establishes predefined steps to review and identify risk and hazards for a given change.

Employees report hazards and potentially hazardous situations through their line manager in the first instance who will deal with it in line with INOVYN SHE policy.

#### GRI 403-3

### Occupational health services

We are committed to providing a safe workplace and comply with all applicable health and safety laws and recognized standards. Information on occupational health services is provided across all our sites with employees at our large sites having access to health services via on-site clinics.





Medical surveillance is designed to detect potential workplace hazards before irreversible health effects can occur. We provide a comprehensive medical monitoring service to assess employees exposed, or potentially exposed, to occupational hazards. We focus on prevention by proactively detecting hazards before they affect our people.

Regular health screenings assess individuals and confirm the effectiveness of exposure prevention strategies. Clinicians with expertise in occupational health, industrial exposures and respiratory protection screen workers with physical examinations and various screening tests performed at set intervals. Employees also have access to knowledgeable health professionals so they can raise questions.

**Occupational health services (OHS) are available to employees at a site level. As a Company, we take our responsibility seriously for maintaining good and up-to-date working conditions and ensuring the wellbeing and security of employees.**

Engaging with employees and encouraging safety thinking, ensuring information to/from the organisation/management (safety point of contact) and ensuring that OHS initiatives are facilitated.

#### GRI 403-4

### Worker participation, consultation and communication on occupational health & safety

SHE committees at site level help drive our zero-incident culture. They ensure engagement and provide a representative forum to communicate, encourage and increase employee involvement in identifying and resolving SHE concerns with employees. Committees typically meet on a monthly or bimonthly basis and rotate members every two years. Members participate in identification of hazards, assessment of risks, investigation of incidents, implementation of corrective measures and audits.

#### GRI 403-5

### Worker training on occupational health & safety

SHE training for all employees is mandatory at every site. Employees and contractors undergo comprehensive training, ensuring they know what to do in the event of an incident and are aware of the protocols in place to protect themselves and those around them. The extent of training varies by role and task, with best practice and key learnings shared for all training.

#### GRI 403-6

### Promotion of worker health

We view employee health and wellbeing as essential to our business. The Company has a statutory obligation to ensure a safe workplace in which any potential risks and hazards to health are appropriately managed. This includes for example putting in place processes and procedures to prevent exposure to hazardous substances. We also provide suitable training and detailed work instructions for those employees involved in high hazard activities.

Beyond this, the Company has a strong belief that work life should be a positive experience for employees, for example by:

- providing high quality roles in which employees are motivated, challenged and have clear accountability;
- recognising and rewarding performance and encouraging personal development;
- fostering a team-oriented environment where there is an open, trusting and caring culture;
- and, encouraging all employees to maintain a good work/life balance.





## GRI 403-8

## Workers covered by an occupational health & safety management system

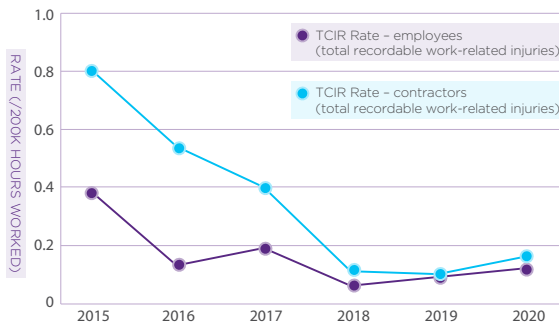
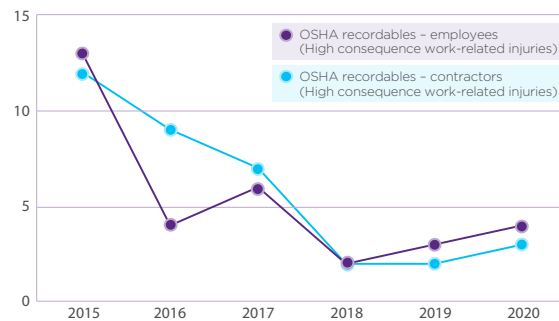
All employees and contractors at INOVYN or joint-venture sites are required to comply with all SHE requirements. Sites undergo internal audits to verify compliance with applicable SHE monitoring systems and procedures. Lessons learned and best practices are shared across the business. Onsite contractors, including logistics companies that handle and transport our products, are expected to comply with our SHE policies and support the drive for zero incidents.

We adhere to quality management systems certified by the International Organization for Standardization, ISO. As of 2020, 93% of our manufacturing sites across Europe are certified with ISO 14001 for Environment. 93% of all our sites are also certified with ISO 9001 for Quality. 71% of our sites within Belgium, France, Germany and Italy are certified with ISO 45001 for Safety and Health, as well as our sites in Sweden, Germany and France achieving ISO 50001 for Energy.

In addition to ISO certifications, INOVYN also draws on the Occupational Health and Safety Assessment Series (OHSAS). Our sites in Italy, Spain and two sites in Belgium have achieved OHSAS 18001 certification on Occupational Health and Safety Management.

## GRI 403-9

## Work-related Injuries



FACTOR	UNIT	2015	2016	2017	2018	2019	2020
OSHA Recordables - employees (High consequence work-related injuries)	Number	13	4	6	2	3	4
OSHA Recordables - contractors (High consequence work-related injuries)	Number	12	9	7	2	2	3

FACTOR	UNIT	2015	2016	2017	2018	2019	2020
TCIR Rate - employees (total recordable work-related injuries)	Rate (/200k hours worked)	0.39	0.13	0.19	0.06	0.09	0.12
TCIR Rate - contractors (total recordable work-related injuries)	Rate (/200k hours worked)	0.81	0.54	0.40	0.11	0.10	0.16









FACTOR	UNIT	2015	2016	2017	2018	2019	2020
Total hours worked - employees	Million Hours	6.6	6.19	6.42	6.23	6.45	6.62
Total hours worked - contractors	Million Hours	2.95	3.30	3.46	3.68	3.90	3.79

INOVYN has not recorded any employee or contractor fatalities since its inception in 2015.



## 404: Training and Education

### GRI 404-1

Average hours of training per year per employee		Unit		
COUNTRY		INTERNAL	EXTERNAL	TOTAL HOURS
	Belgium	58.5	17	75.5
	France	31	8	39
	Germany	22.5	2.5	25
	Italy	19	12	31
	Spain	32	20	52
	Sweden	20	10	30
	Norway	37	3	40
	UK	50	10	60

### GRI 404-2

## Programs for upgrading employee skills and transition assistance programs

INOVYN has a number of programmes aimed at developing the skills of existing and potential future managers.

Our Management Development Programme for nominated employees consists of eight core modules designed around core management competences. Each module is run over one or two days and is attended by a cross-functional mix of managers at all levels, which helps to foster improved management networking and collaboration.

We also run a targeted two-day Project Management workshop for senior managers designed specifically to support the implementation and delivery of INOVYN Strategic Objectives and improvement programmes. Selected senior managers can be nominated by their Executive Member to attend a one-year MBA course run by the London Business School.

### Professional development

We are committed to lifelong learning and professional development. Where employees wish to enhance their professional skills in relation to their chosen career path and can demonstrate a proficient level of performance, the Company will consider providing financial support and part-time study leave for the attainment of additional professional qualifications.

### Transition assistance programme

INOVYN operates to a framework 'Social Measures in Case of Restructuring' that has been agreed with the European Works Council. Through this framework, we attempt to limit the social impact of restructuring and forced redundancies, proposing, where possible, measures such as support to internal or external reclassification; training facilitating access to new employment and measures facilitating geographical

mobility. Our priority is to search an internal solution for all employees impacted by restructuring, which may include repositioning within INOVYN or INEOS. In the event an internal solution cannot be found, INOVYN will provide outplacement support provided by a specialised outplacement firm.

### GRI 404-3

## Percentage of employees receiving regular performance and career development reviews

INOVYN has introduced a set of corporate values, which apply to all employees and underpin how we expect employees to work, both internally with colleagues and externally with key stakeholders:

- We are committed to safety, health and the environment as our top priority.
- We are motivated by achievement and the delivery of ambitious targets.
- We work together as a team, respect other points of view and challenge each other to achieve more.
- We are totally committed to the success of the business and take full accountability for delivering it.
- We welcome change and the challenges and opportunities it presents.
- We act with integrity in everything we do and are open and honest with each other.



## Performance appraisal

All employees receive regular feedback on their performance from their supervisor or line manager. In addition, 2,086 employees (49%) took part in a formal performance appraisal process in 2020.

The process is designed to increase satisfaction and motivation, through the performance of individuals, using a structured approach that focusses effort on agreed objectives, focuses potential for development and provides a mechanism for assessing and rewarding positive discretionary behaviours linked to corporate values.



## 405: Diversity and Equal Opportunity

GRI 405-1

### Diversity of governance bodies and employees

EMPLOYEE CATEGORY	GENDER	
	MALE	FEMALE
Executive	83%	17%
Senior	86%	14%
Graded (non-senior)	78%	22%
Ungraded (non-senior)	87%	13%
All employees	85%	15%

EMPLOYEE CATEGORY	AGE RANGE		
	UNDER 30	30-50	50 AND OVER
Executive	0%	0%	100%
Senior	0%	26%	74%
Graded (non-senior)	6%	44%	51%
Ungraded (non-senior)	15%	45%	40%
All employees	13%	44%	43%

## 406: Non-Discrimination

GRI 406-1

### Incidents of discrimination and corrective actions taken

INOVYN is an equal opportunities employer that does not discriminate on the grounds on gender, age, ethnicity, sexual orientation or ability. All employees are judged equally and assessed based on their skills, experience and performance in role.

For safety and health reasons, certain roles require a minimum level of physical fitness (for example emergency services personnel). Likewise, due to the nature of certain production processes, those working on certain chemical plants may be required to be screened for certain medical conditions (for example, the use of a pacemaker). Where such restrictions are in place this is made known as part of a formal risk assessment and as part of a written job description.

We comply fully with all applicable anti-discrimination legislation. In addition, we make all reasonable adjustments to the workplace to accommodate employees with specific health or disability requirements. Where an employee develops a new health condition or disability that affects their ability to perform their existing role, the Company is committed to finding them a suitable alternative role. Formal grievance processes are in place under which employees are able to raise any concerns about potential discrimination.



## 407: Freedom of Association and Collective Bargaining

GRI 407-1

### Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk

We depend on good relations with our workforce. Membership of trade unions varies in accordance with the business areas and local practice in the countries in which we operate. A number of our companies have entered into collective bargaining agreements with trade unions either directly or as members of employer organisations. These agreements typically govern, among other things, terms and conditions of employment and dispute resolution procedures. Terms and conditions of union agreements reflect the prevailing practices in each country. We estimate that as of 31 December 2019, at least 52% of our employees were members of a union.

Moreover, all EU-based employees benefit from a European Works Council agreement that is designed to provide a formal mechanism for management and employee representatives to communicate on significant or potentially significant issues across our European operations. Historically, INOVYN has enjoyed good labour relations, and we are committed to maintaining these relationships.

We take a constructive approach to union relationships where there are unionised sites, and all of our businesses have been able to secure the cooperation of both unions and the non-union workforce with regard to significant changes and the process of continuous improvement of their businesses.

## 408: Child Labour

GRI 408-1

### Operations and suppliers at significant risk for incidents of child labour

INOVYN prohibits child labour. We will not engage in, and will not tolerate any of our customers, suppliers, distributors or others with whom we do business with, to engage in child or forced labour, slavery or human trafficking of any kind. The majority of the INOVYN's activity is carried out in the EU, which we consider to be low risk in relation to child labour. Nevertheless, we recognise our responsibility and we have alerted relevant staff to the risks of child labour, however small, in their businesses and across the wider supply chain. We set mandatory requirements in our Supplier Code of Conduct linked to child labour and minimum age requirements as a necessary condition that suppliers have to adhere to.

## 409: Forced or Compulsory Labour

GRI 409-1

### Operations and suppliers at significant risk for incidents of forced or compulsory labour

INOVYN does not engage, and will not tolerate any of its customers, suppliers, distributors, or others with whom it does business, to engage in forced or compulsory labour. All work completed by our staff and contractors is entirely voluntary.

We will never require any employee or contractor to surrender government-issued identification, passports, work permits or travel documents as a condition of employment. Our contracts and HR policies clearly and transparently outline the conditions of employment in the language understood by our employees. Externally, our contracts and terms of conditions clearly lay out our position on anti-slavery, forced or compulsory labour work and child labour. The INEOS Modern Slavery Transparency statement, which we adhere to, can be viewed here: [INEOS Anti-Slavery Act](#).





## 412: Human Rights Assessment

GRI 412-1

### Operations that have been subject to human rights reviews or impact assessments

INOVYN is committed to preserving human rights as a key principle and ensuring that the conduct of all employees and our operations is consistent with all standards of international human rights. Where human rights-related risks can be found, we diligently carry out assessments to mediate any possible impacts. While the chemicals and plastics industry is not typically susceptible to human rights risks, we are vigilant to prevent any infringement.

We will not tolerate working with any customers, suppliers or contractors who turn a blind eye to human rights. We set mandatory requirements in our Supplier Code of Conduct as well as the [INEOS Code of Conduct](#).

## 413: Local Communities

GRI 413-1

### Operations with local community engagement, impact assessments, and development programs

We recognise our responsibility to be a good, honest neighbour in the communities in which we operate. To protect our environment, our employees and our surrounding communities. We always evaluate risks and have detailed emergency procedures and plans in place. All INOVYN sites have emergency response teams that are trained to respond to medical incidents, fires or release of hazardous materials.

The nature of the scale of our operations means we often are a local employer, providing jobs and creating economic value in areas where we operate. We support local economies by hiring locally, supporting local suppliers and purchasing goods and services locally.

INOVYN takes an active role in local charities, volunteering time and resources to support charities we believe in. In 2020, we were proud to donate to essential charities local to our European sites, including The Solan Connor Fawcett Family Cancer Trust that is based near Newton Aycliffe (U.K.), Fundació Residència Sant Joan de Déu de Martorell in Martorell (Spain), Fellesverket Henrys Hus in Porsgrunn (Norway) and Tjejjouren Västby by Stenungsund (Sweden).

We regularly engage with our local communities through several channels: local community consultations, work councils and regular stakeholder engagements.

We maintain open and honest communications with our communities, informing them of social impact assessments, environmental impact assessments, or any changes that could impact our local community and environment.

GRI 413-2

### Operations with significant actual and potential negative impacts on local communities

There are a number of INOVYN manufacturing facilities that make, store or handle hazardous chemicals. These sites are subject to an additional level of internal and external regulation to ensure that potential risks and hazards are mitigated and that there is a high degree of safety.

These sites also have in place formal internal and external incident and emergency response plans, to ensure the safety of people working at the facility and those who live and work nearby.

Due to the need to maintain a good level of security, precise details of substances made, stored or handled at each site are not publicly disclosed.



## 414: Supplier Social Assessment

### GRI 414-1

#### New suppliers that were screened using social criteria

We expect all suppliers to comply with INOVYN's Supplier Code of Conduct that details our minimum standards related to Safety, Health and Environment, Human Rights & Labour Practices and Business Ethics. Our Code of Conduct is supplied to all new suppliers as part of our Supplier Selection Process.

In addition to our Code of Conduct, we require all new suppliers to fill out our Supplier Questionnaire, which provides us with information on the supplier's social policies. In 2020 we launched a supplier CSR questionnaire that collects further detail into our suppliers social management systems. In 2021, we have targeted a selection of our key suppliers, with the intent to widen this to all key suppliers in 2022 and all new suppliers in due course.

We further ensure that our social criteria for suppliers is met through our INOVYN [Terms and Conditions](#), which outline several clauses related to social criteria. Those include clauses on anti-slavery, anti-bribery and sanctions. We have the right to terminate our contacts with any supplier that does not meet our criteria on social policies. Through those mechanisms, we ensure that our suppliers meet those conditions as a minimum.

## GRI 415: Public Policy

### GRI 415-1

#### Political Contributions

INOVYN does not participate in any political activity. We have policies regarding political contributions as stated in the INEOS Code of Conduct and our internal delegation rules. Under those rules, our CEO must approve any political contribution given by the Company.

**We are not involved politically, and we have not, to date, contributed to any political campaigns in any of the countries in which we operate in. We are, however, part of several European trade associations and we lobby for and against issues related to our industry as part of these trade associations.**

Our lobbying activity on behalf of the interests of INOVYN is highly regulated by law and all employees involved in lobbying must comply with all laws regulating corporate participation in public affairs and are provided with adequate training in anti-competition and anti-corruption.



## 416: Customer Health and Safety

GRI 416-1

### Assessment of the health & safety impacts of product & service categories

## 417: Marketing and Labelling

GRI 417-1

### Requirements for product and service information and labelling

All INOVYN products and services are assessed for health and safety impacts. Business units conduct annual reviews of their products and services, as well as their risks to human health and the environment. Product risks are identified and managed through continuous improvement and the relevant action taken at a site or business level where necessary.

Product safety performance and customer feedback is tracked through our customer technical services function. End-use applications, raw materials and process aids used in our production processes are regularly reviewed in light of regulatory or market changes. Based on these assessments we may replace raw materials with safer

alternatives. End-use applications that are not in line with our sustainability strategy, internal ethics review or regulation may be prohibited and actions taken to ensure products are not sold to those markets.

We have clear standards and processes in place to comply with all applicable regulations, monitoring changes continuously. Relevant regulations include the European Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals (REACH); the UK Registration, Evaluation, Authorisation & restriction of Chemicals (UK REACH); the Toxic Substances Control Act in the U.S. (TSCA); the Act on the Registration and Evaluation of Chemicals in Korea (Korea REACH), and many others.

We provide a range of information to ensure the safe handling of chemicals to our customers, including safety data sheets (SDS), and when requested, regulatory clearances for our products and their end uses.

We are fully committed to the long-term sustainability of our business. We are familiar with and closely scrutinise our products' properties, establish guidelines for safe handling and processing and will continuously review and update our criteria and guidelines for the development of new products.

GRI 417-2

### Incidents of non-compliance concerning the health & safety Impacts of products & services

In 2020 we were not served any notices of violation by the relevant authorities in respect of health and safety laws and met all mandatory and voluntary dossier update obligations.





## 418: Customer Privacy

GRI 418-1

### Cybersecurity

INOVYN has implemented comprehensive policies and procedures to protect against continually evolving sophisticated global cybersecurity threats. Our cybersecurity programme covers key areas of management, technical and physical controls, legal compliance and business continuity.

Within INEOS and INOVYN there are dedicated cybersecurity teams. The INOVYN Cybersecurity Manager reports to the Head of IT, who in turn reports directly into the INOVYN Executive. At the INEOS Group level, Company standards and mandates are developed, compliance with these is measured via quarterly KPIs. Response to significant incidents are escalated through group-wide incident reporting.

#### Our cybersecurity protections include:

- Annual programme of cybersecurity training for all computer users on relevant policies and standards, best practices at work (office and remote), and how to identify and respond to key threats.
- Protective software installed and configured on Company systems and mobile devices, updated and patched on a regular basis, to provide protection against malicious threats.

- 24/7 monitoring and alerting of suspicious activities on our systems through external 3rd party Security Information and Event Management (SIEM) and Security Operations Centre (SOC).

- Established Cyber Incident Response Plans (CIRPs) for dealing with phishing, ransomware and other cybersecurity incidents.

- Regular technical risk assessments of our network, applications and manufacturing facilities using a combination of trusted suppliers and a dedicated internal team.

- Penetration, threat hunting, and vulnerability assessments conducted regularly.

- Business continuity and disaster recovery plans that are well documented and tested on a periodic basis.

#### Data Privacy

INOVYN collect and hold personal data on current and past employees, contractors, suppliers, job applicants, visitors and members of the public so as to be able to fulfil employment and business contracts, for security reasons, and to manage its business obligations and interests.

The Board and management of INOVYN are committed to compliance with all relevant national and EU laws in respect of personal data, and to protecting the rights and freedoms of individuals whose information they collect in accordance with, but not limited to the EU General Data Protection Regulation (GDPR) or the UK-GDPR, as applicable.

INOVYN maintain and continually improve their management systems to ensure that they meet their obligations under Personal Data protection laws and regulations. INOVYN have policies, processes and procedures in place to manage personal data activities; provide staff with awareness training; ensure data security measures are in place; and ensure INOVYN have an appropriate legal basis for processing personal data.

For more information regarding how INOVYN process personal data, see the [INOVYN Privacy Policy](#).





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