

INEOS

Supplier code of conduct

June 2023



Preface



INEOS is committed to operating as a responsible company and complying with all relevant local, national, and international laws. Our mission is to be a leader in our industry, to operate without compromise to health, safety or the environmental and advancing sustainability in society and maintaining the highest ethical standards.

INEOS expects its suppliers to comply with applicable laws and adhere to internationally recognised Environmental, Social and Governance (ESG) standards, including those set forth in our Code of Conduct and SHE policy.

This Supplier Code of Conduct (SCoC) is based on the United Nations Global Compact principles to which INEOS has subscribed and reflects the United Nations Guiding Principles on Business and Human Rights, the International Labour Organization Declaration on Fundamental Principles and Rights at Work, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and the Responsible Care Global Charter. It defines and summarises what we expect of our suppliers, suppliers' subsidiaries and affiliates, and their subcontractors or other business partners' contractors and agents, regardless of location or background relative to the following categories:

- Health and safety
- Environmental protection
- Labour practices and human rights
- Ethics and fair business practices

As an INEOS supplier, and part of our supply chain, we expect that you and your own suppliers will conduct business in line with the values and principles outlined in this SCoC, always in full compliance with all applicable laws and regulations, and that you select your suppliers and counterparties accordingly.

By accepting to work for or with INEOS, suppliers commit to abide by this SCoC. INEOS reserves the right to conduct audits and assessments to verify your compliance with this SCoC.

Conduct inconsistent with or in violation of this SCoC may result in suspension or termination of business with INEOS. Any inconsistency with or violation of this SCoC can be reported directly to your **INEOS contact** or via **email**.



Health and Safety

Ensuring that the highest health and safety standards are met in our value chains is of prime importance to INEOS. Suppliers shall provide and maintain a safe work environment including workplace, workstation and work equipment and encourage sound health and safety practices.

- **Occupational health, safety and hazard prevention**

A safe, healthy working environment must be provided for all employees and on-site contractors, in accordance with applicable laws and regulations, with the aim of creating an incident-and-injury-free work environment and preventing the occurrence of occupational illness and health problems associated with its activities.

- **Emergency management**

Suppliers shall identify and assess potential emergency situations. For each situation, suppliers shall develop and implement emergency plans and response procedures that minimise harm to life, environment, and property.

- **Sanitation, food and housing**

Suppliers shall provide employees and on-site contractors with reasonably accessible sanitary accommodations and, where applicable, clean and safe dormitories, dining, food preparation, and storage facilities.

- **Communication and training**

Employees and on-site contractors must be adequately informed about health and safety issues, and provided with appropriate training in their regional language to minimise health and safety risks.

- **Life Saving rules**

Suppliers and others who work on their behalf will comply with the 7 INEOS Life Saving Rules (www.ineos.com) when working on INEOS premises.



Environmental Protection

Advancing towards climate-neutrality, circularity, and zero-pollution in our value chains is of great importance to INEOS. Suppliers shall comply with all applicable environmental laws and international conventions, use resources responsibly, and minimise negative impacts relating to climate change, pollution and emissions, water scarcity, and biodiversity; such negative impacts also relate to certain human rights risks, such as, but not limited to, those (i) significantly impairing the natural bases for the preservation of food, (ii) deteriorating people's access to safe and clean drinking water, (iii) making it difficult for a person to access sanitary facilities or destroying them or (iv) harming the health of a person. Suppliers shall identify the risks and environmental impact of their materials and products on a life cycle basis and cooperate in measuring the environmental footprint of INEOS's materials and products.

- **Reduction of greenhouse gas emissions**
Suppliers shall monitor and reduce their greenhouse gas emissions taking a systemic approach that considers Paris Agreement targets as a minimum.
- **Resource efficiency**
Suppliers shall reduce energy, water and natural resource consumption by implementing conservation and substitution measures.
- **Management of emissions to air, to water, to soil, and of noise and excessive water consumption**
Suppliers shall implement a systematic approach to identify, control and reduce consumption of water, emissions to air, to water, to soil and of noise produced by its operations to avoid any harmful soil change, water pollution, air pollution, harmful noise emission and excessive water consumption.
- **Disposal of waste material**
Suppliers shall implement a systematic approach to identify, manage, reduce and responsibly dispose of or recycle hazardous and non-hazardous material.
- **Prevention of pollution**
Suppliers shall minimise hazardous substance consumption by implementing reduction/substitution measures and preventing pollution.
- **Safe handling of materials and products**
Suppliers shall have systems in place to ensure the safe handling, use, storage, transport, and disposal of materials and products. They shall follow Responsible Care principles when managing chemicals and take part in the Operation Clean Sweep initiative when handling plastic pellets.
- **Permitting**
Suppliers shall obtain, keep current and comply with all required environmental permits.
- **Safety and health risks for local residents**
Suppliers shall systematically and regularly evaluate the impact of their activities on local residents, including transportation of goods.



Labour practices and human rights

Ensuring that human rights are respected and workers are treated well in our value chains is of great importance to INEOS. Suppliers shall ensure that the workplace is fair and inclusive and that they respect the rights in the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and that they enable their employees and other stakeholders to report concerns or potentially unlawful practices at the workplace.

- **Anti-discrimination, anti-harassment and abuse**

Suppliers shall not discriminate against any staff member, for example based on race, colour, ethnic origin, religion, sex, gender, age, national or social origin, sexual orientation, gender identity, marital status, disability, political affiliation or union membership, in hiring and other employment practices like salary, promotions, rewards, access to training, employment termination and retirement. Suppliers shall provide a workplace free of harassment, corporal punishment, coercion and abuse. Any threats or other forms of intimidation are prohibited.

- **Prevention of forced labour and human trafficking**

Suppliers shall ensure that all work is voluntary. Employment contracts shall be easily understood by employees and they should be free to terminate their employment upon reasonable notice or in accordance with local law. Suppliers shall not traffic persons or use any form of forced, bonded, slave, or prison labour. Employees should not surrender any personal identification documents as a condition of employment.

- **Prevention of child/underage labour**

Suppliers shall employ only members of staff who are at least 15 years of age or the applicable minimum legal age, whichever is higher. For persons under the age of 18, suppliers shall identify presence, monitor health, working conditions, hours and time of work and shall not employ for hazardous work or in a manner that is economically exploitative, interferes with education or is harmful to health, and the employee's physical, mental, spiritual, moral or social development. Legitimate workplace apprenticeship programmes for educational benefit are acceptable, provided, that they are consistent with Article 6 or 7 of ILO Minimum Age Convention No. 138.

- **Conflict minerals**

Suppliers shall ensure that they do not supply materials and products containing minerals that contribute to conflict by applying the due diligence procedures in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

- **Working conditions**

Suppliers shall follow all applicable laws, regulations and/or collective agreements with respect to working conditions, hours, days of rest, wages and salaries which must correspond to locally applicable living wages. Suppliers shall ensure sufficient processes to prevent physical and mental fatigue.

- **Freedom of association and collective bargaining**

As legally permitted, suppliers shall freely allow employees to associate with others and organisations of their choice and seek representation to bargain collectively. Suppliers shall allow employees to express their concerns about working conditions or potentially unlawful practices without threats of reprisal or harassment.

- **Unlawful eviction**

Supplier shall not participate or contribute to the unlawful eviction and unlawful taking of land, forests and waters.

- **Security forces**

Supplier shall ensure that security forces if used for the protection of Suppliers' projects or assets always operate within the bounds of applicable laws, and are being properly instructed and monitored to avoid torture and cruel, inhumane or degrading treatment, damages to life or limb, or impairment of the right to organise and the freedom of association.

Ethics and fair business practices

Ensuring that business practices meet the highest standards in our value chains is of great importance to INEOS. Suppliers shall conduct business in a fair and ethical manner, and operate in full compliance with international, national and local laws and regulations that are applicable to their business operations, and to obtain all necessary permits.

- **Anti-trust and competition**

Suppliers must adhere to anti-trust and competition laws.

- **International trade**

Suppliers must adhere to international trade and export control regulations, as well as embargoes and sanctions imposed by national or supranational bodies or governments.

- **Bribery and corruption**

Suppliers must refrain from any and all forms of corruption, including extortion and active or passive bribery, money laundering and insider dealing.

- **Gifts and entertainment**

Suppliers must respect that INEOS employees do not give or accept any gift or favour that could compromise or raise doubts about the neutrality of the decisions. Suppliers ensure that payments, gifts or other commitments to customers, government officials, subcontractors or other parties transacting on their behalf are in compliance with applicable anti-bribery laws.

- **Conflicts of interest**

Suppliers shall disclose to INEOS information regarding potential or actual conflicts of interest as an INEOS supplier.

- **Intellectual property, data protection and confidentiality**

Suppliers will neither use nor disseminate the intellectual property of INEOS in any manner inconsistent with the particular engagement as a supplier to INEOS. Supplier will not, and will ensure that its suppliers and customers do not, infringe or misappropriate the intellectual property of INEOS. The Supplier shall implement the necessary security controls and precautions to protect any data against unauthorized or accidental loss, destruction, damage, alteration or disclosure.





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