

INEOS

Supplier code of conduct

January 2025



Preface



INEOS is committed to operating as a responsible company and complying with all applicable local, national, and international laws. Our mission is to be a leader in our industry, to operate without endangering human health, safety or the environment, to promote social sustainability and to maintain 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 out in our Code of Conduct and SHE policy.

This Supplier Code of Conduct (SCoC) is based on the principles of the United Nations Global Compact to which INEOS is a signatory. The UN Global Compact reflects the United Nations Guiding Principles for 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 ICCA Responsible Care Global Charter. It defines and summarises what we expect of our suppliers, their subsidiaries and affiliates, and their subcontractors or other business partners' contractors and agents, regardless of location or background, with respect 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 you and your suppliers to conduct business in line with the values and principles outlined in this SCoC in consistent full compliance with all applicable laws and regulations, and that you will select your own suppliers and counterparties accordingly.

By agreeing 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 your business relationship with INEOS. Any inconsistency with or violation of this SCoC may be reported directly to your [INEOS contact](#) or via [email](#).

At INEOS, open and honest communication is the expectation, not the exception. We want individuals to feel comfortable raising concerns if they become aware of any unsafe, unlawful or unethical behaviour. All concerns are taken seriously and handled confidentially. INEOS does not tolerate retaliation in any form. INEOS Speak Up is a free service provided by an independent company (NAVEX). Reports can be made 24 hours a day, seven days a week using a toll-free phone number or via the Speak Up website. Those reporting a concern can do so anonymously. All employees and third-party stakeholders (including contractors, partners and suppliers) can use the Speak Up system.



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 to 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 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, the 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 and dining, food preparation, and storage facilities.

- **Communication and training**

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

- **Life-Saving Rules**

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



Environmental protection

Promoting climate neutrality, a circular economy, 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 natural methods of food preservation, (ii) restricting 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 impacts of their materials and products from a life cycle perspective 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 systematic approach that, at a minimum, takes the targets of the Paris Agreement into account.
- **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 the consumption of water, emissions to air, water and soil and the noise generated by its operations to avoid any harmful changes to soil composition, water pollution, air pollution, harmful noise emissions 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 to surrounding communities**
Suppliers shall systematically and regularly evaluate the impact of their activities on surrounding communities, including the 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 set out 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 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 such as 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 the employees and they shall have the right to terminate their employment subject to giving 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 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 specify presence requirements, monitor health, working conditions, hours and working time and shall not employ such persons for hazardous work or in a manner that is economically exploitative, interferes with education or is harmful to health, physical, mental, spiritual, moral or social development. Legitimate workplace apprenticeship programs 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 set out in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

- **Working conditions**

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

- **Freedom of association and collective bargaining**

As the law provides, suppliers shall allow employees to freely associate with others and organisations of their choice and to seek representation to for the purposes of collective bargaining. Suppliers shall allow employees to express their concerns about working conditions or potentially unlawful practices without threats of reprisal or harassment.

- **Unlawful eviction**

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

- **Security forces**

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

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 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 trading.

- **Gifts and entertainment**

Suppliers must respect that INEOS employees may not give or accept any gifts or favours that might compromise or raise doubts about the impartiality of decisions. Suppliers shall ensure that payments, gifts or other benefits to customers, government officials, subcontractors or other parties transacting on their behalf comply with applicable antibribery laws.

- **Conflicts of interest**

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

- **Intellectual property and confidentiality**

Suppliers will neither use nor disseminate the intellectual property of INEOS in any manner inconsistent with the Supplier's specific commitment to INEOS. Suppliers shall not infringe upon or misappropriate the intellectual property of INEOS and shall ensure that its suppliers and customers do likewise.

- **Cybersecurity**

Suppliers must uphold strict cybersecurity standards to protect INEOS data and operations. This includes robust data security measures, like multi-factor authentication, and immediate reporting of any cybersecurity incidents per agreed and regulatory protocols. Regular audits and third-party risk assessments are essential to identify and mitigate risks, and suppliers must ensure that downstream vendors must also comply with these cybersecurity standards. Suppliers are expected to provide ongoing cybersecurity training for staff handling data, and to maintain secure networks with firewalls, intrusion detection systems, encryption, and regularly updated software. Effective business continuity and disaster recovery plans are essential to support resilience, alongside compliance with all relevant legal, regulatory, and contractual cybersecurity obligations.

Ethics and fair business practices





INEOS

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