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# Borealis Ethics Policy for Business Partners

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Code of Business Conduct



**ETHICS AND  
COMPLIANCE**



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# 1. Our Business Partners

Our Business Partners play an integral role in our business. We seek to deal with Business Partners who share our values and we expect our Business Partners to comply with relevant aspects of this Code.

A Business Partner is anyone who does business with Borealis, including:

- Suppliers
- Consultants
- Agents
- Sales representatives
- Dealers
- Independent contractors
- Contract workers
- Customers

We evaluate our Business Partners carefully before engaging with them, and we expect them to conduct themselves in an ethical and compliant manner.

Business Partners who interact with governments must be vetted with extra caution, particularly in countries perceived to be less transparent.

Business Partners must be subject to confidentiality agreements if they have access to confidential or proprietary information.

Suppliers are expected to have policies in place which confirm compliance with following rules:

- Ten Principles of the United Nation’s Global Compact
- International Labor Standards of the International Labor Organization
- United Nation’s Guiding Principles on Business and Human Rights and/or OECD guidelines for Multinational Enterprises
- Environment, Health & Safety Standards of Responsible Care.

## Supplier’s Commitment

Suppliers shall be selected fairly and without a conflict of interest or any kind of favoritism that might compromise the selection process.

Suppliers shall treat workers fairly, provide safe and healthy workplaces, minimize their environmental impact and impose the same requirements on their subcontractors.

## 2. Health, Safety and Environment

We are committed to safety and protecting the environment. Nothing is more important to us than the health and safety of our employees and behaving responsibly towards our environment.

Borealis is a strong supporter of the industry-wide Responsible Care® initiative, which

focuses on concerns relating to health and safety and the environment in relation to our business.

We expect our Business Partners to understand and comply with all local environmental and health and safety regulations in the jurisdictions where Borealis conducts business.

## 3. Raising concerns

Where you have a concern about a proposed course of action, or about a current situation with regard to your business relationship to Borealis, you shall raise it to your contact person at Borealis. If you believe that the contact person is possibly involved, please report your concern to the Borealis Ethics Hotline.

Borealis is committed to taking every reported concern very seriously. Every report is carefully reviewed and handled with the utmost sensitivity

and confidentiality (to the extent legally permissible) and in accordance with applicable legal requirements.

### No retaliation against those who raise concerns

It is essential to the effectiveness of this Code, and to the maintenance of a culture of integrity throughout Borealis, that Business Partners should feel able to speak freely without any fear of disadvantage for the business relationship.

## Ethics Hotline

**+32 1547 9090**

**during normal business hours in Europe  
(for France call +33 1 47 96 92 45) or email to [ethics@borealisgroup.com](mailto:ethics@borealisgroup.com)**

**For anonymous reporting, please use the Ethics Form.**

## 4. Specific compliance expectations

### 4.1 You and Borealis

#### 4.1.1 Working with each other

We expect our Business Partners to treat everyone with fairness, respect and dignity. We do not tolerate any form of abuse, harassment or discrimination. This includes actions that can be considered offensive, intimidating or discriminatory, as well as any form of sexual harassment.

#### 4.1.2 Data privacy

As a Group, Borealis is responsible in handling personal information. It is essential that all employees can have confidence that Borealis and its Business Partners will treat their personal information sensitively, in confidence and in line with legal obligations. We take our obligations under the General Data Protection Regulation (GDPR) and any other applicable data protection laws seriously and take care to prevent unauthorised disclosure.

We expect our Business Partners to protect the personal information of Borealis employees in line with the legal requirements.

#### 4.1.3 Confidential information

Business Partners shall not disclose confidential information of Borealis acquired during the course of business to any third party, whether during the course of work or otherwise, unless either:

- they know that the information is not confidential (although, in cases of doubt, staff should assume that information acquired at work is confidential)
- they are authorised to share such information with a specified third party for business reasons

### 4.2 Conducting business the right way

#### 4.2.1 Anti-bribery and anti-corruption

Borealis does not tolerate bribery and corruption in any of its forms in our business and we comply with anti-bribery and corruption laws and regulations.

Bribes, kickbacks, unfair advantages and other acts of corruption are strictly prohibited by Borealis. A bribe is an offer of financial advantage or anything of value which is made in order to induce or reward the improper performance of a function by the recipient. The bribe may be in the form of money, but may take other forms such as hospitality or payment of travel/accommodation, although, this is not intended to prevent normal corporate entertainment.

Bribery and corruption are criminal offences with severe sentences for both companies and individuals who breach them, including potentially imprisonment; for this reason, non-compliance with these requirements is taken particularly seriously.

As a general guide, Business Partners shall:

- never offer, give or accept payment or anything of value directly or through a third party, in the attempt to gain business or to improperly influence a business decision
- refuse any offer of additional “facilitation payment” for performing a function
- take particular care when dealing with public officials
- maintain accurate bookkeeping and records to honestly describe payments.

#### 4.2.2 Insider trading

Borealis expects our Business Partners not to engage in market misconduct.

As a Business Partner you may, during the course of your business relationship with Borealis, be aware of market-sensitive “inside” information (i.e. information which is confidential, but which would, if made public, influence the price of particular shares or other financial instruments). It is unlawful to use such information for personal gain, and there are detailed rules as to how, when and to whom such information may be disclosed.

To guard against breaches of these rules, it is Borealis’ policy that you shall:

- never buy or sell Borealis securities if you have inside information
- never discuss or disclose any material non-public information other than in the proper course of business
- not conduct any private investment activity in companies or sectors in relation to knowledge you have acquired in the course of your business relationship with Borealis which may be relevant
- not make any recommendations to others to deal in Borealis’ securities or securities of any such company or in any such sector.

#### 4.2.3 Anti-competitive behaviour

Borealis competes fairly in all markets and countries and does not collude with its competitors in any aspects of its business. It complies with all applicable competition laws around the world. Laws preventing unfair competition (sometimes known as “anti-trust” laws) are complex and fines for violations are severe. In addition, other consequences of such breach include sanctions for individuals, void agreement and damages as well as bad publicity.

We expect our Business Partners to comply with competition law in the course of their Business with Borealis.

#### 4.2.4 International trade and sanction laws

We are a global company operating in an area (chemicals) subject to international trade regulation. We comply with all trade laws of all countries in which we operate including sanction, import and export control and customs laws that apply to the cross-border trade of our products and services.

Business Partners involved in the cross-border trade of our products and services shall:

- comply with applicable trade control and sanctions laws and applicable custom procedures
- consider sanction risks as part of the business opportunities and business partners.

#### Watch out for:

- New markets: Business in new countries, and particularly countries that are subject to international trade restrictions or sanction programmes
- Dual-use trade controls: Dual-use items are goods, software and technology that can be used both for civilian and military applications. Transit of dual-use items may include transfer via email, download, meetings, discussions, or visits and may be subject to export control requirements. Dual-use trade control may affect business with spare parts and plant components.

#### 4.2.5 Preventing money laundering

Money laundering is the process of hiding illegal funds or making them look as though they are legitimate. It also covers the use of legitimate funds to support crime or terrorism.

- Never become involved in money laundering



## 5. Our Ethics Policy at a glance

- ▶ We are committed to a culture of ethics and compliance in which we conduct our global business with integrity and in accordance with applicable laws and regulations.
- ▶ We expect our Business Partners to speak up when they see potential violations of law, regulation policy or this Ethics Policy.
- ▶ Nothing is more important to us than the health and safety of our employees and behaving responsibly towards our environment.
- ▶ We treat everyone with respect and will not tolerate unfair treatment, harassment, abuse or retaliation within the workplace.
- ▶ We protect personal data and confidential information.
- ▶ We do not accept bribes, kickbacks or any other kind of improper payments. We keep accurate books and records to honestly describe payments.
- ▶ We only offer or accept gifts and hospitality if it is legal, modest, reasonable and appropriate.
- ▶ We do not enter into any form of agreement or understanding with competitors to fix prices or otherwise restrict free competition.
- ▶ We carefully evaluate our Business Partners before we engage them and we expect them to conduct themselves in an ethical and compliant manner.

For more information or for the latest version please visit:  
[www.borealisgroup.com/en/company/sustainability/our-position/ethical-business/](http://www.borealisgroup.com/en/company/sustainability/our-position/ethical-business/)  
or call the Ethics Hotline: +32 1547 9090

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**About Borealis** Borealis is a leading provider of innovative solutions in the fields of polyolefins, base chemicals and fertilizers. With its head office in Vienna, Austria, the company currently has around 6,800 employees and operates in over 120 countries. Borealis generated EUR 8.3 billion in sales revenue and a net profit of EUR 906 million in 2018. Mubadala, through its holding company, owns 64% of the company, with the remaining 36% belonging to Austria-based OMV, an integrated, international oil and gas company. Borealis provides services and products to customers around the world in collaboration with Borouge, a joint venture with the Abu Dhabi National Oil Company (ADNOC).

**For more information visit:** [www.borealisgroup.com](http://www.borealisgroup.com) · [www.borouge.com](http://www.borouge.com) · [www.waterfortheworld.net](http://www.waterfortheworld.net)

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