



CODE OF CONDUCT



Opening Letter from Ken Lane

At Olin, our purpose is to deliver essential materials and solutions that enhance and protect lives. With this purpose guiding our work every day, the actions we take and the decisions we make help set the tone for our workplace environment and our culture. When these actions comply with our Code of Conduct and Company Values, they drive our success and send a powerful message that integrity really does matter.

Our commitment to our Company Values helps us, with each decision we make, to do what's right.

The Olin Code of Conduct is our binding and practical guide to making ethical decisions at every level, regardless of our position or seniority. No matter our responsibilities or location around the world, the Code applies to all of us: Officers, Managers, Employees, and our Board of Directors. We all receive annual Code of Conduct training and are expected to read, understand, and refer to the Code as often as needed.

Conversations with your manager or any of the other resources listed in the Code are crucial to continuous learning, and engaged dialogue helps ensure compliance, and more importantly, that we live our Values every day and in every way.

Your commitment to representing Olin with the highest standards of integrity is appreciated as we work to continue our company's growth and prosperity for years to come.



Kenneth Lane
President & CEO
Olin Corporation



Table of Contents

Opening Letter from Ken Lane	3
Section 1: Our Values and Our Code of Conduct	6
Our Company Values	6
Honesty Always	7
Ethical Decision Making	7
Speaking Up and Seeking Guidance	7
Guidance for Employees and Managers	7
Confidentiality of Reports	8
How Our Company Investigates Concerns	8
Protection From Retaliation	8
Section 2: Promoting Opportunity	9
Treating Each Other With Respect	9
Prohibiting Bullying, Harassment, and Discrimination	10
Prohibiting Sexual Harassment	10
Ensuring Our Workplace is Alcohol- and Drug-Free	11
Special Responsibilities for Managers Regarding Harassment, Discrimination, Bullying, Violence in the Workplace, or Substance Abuse	11
Corporate Social Responsibility and Protecting Human Rights	11
Section 3: Protecting Our Data and Assets	12
Protecting Our Employees' Privacy	12
Safeguarding Olin's Assets and Use of Company Resources	12
Privacy of Customer and Consumer Information	12
Use of Social Media	12
Disclosing Information to the Public	13
Confidential Information	13
Safe and Appropriate Use of Our Networks	13
Intellectual Property and Copyrights	14
Integrity in Recordkeeping and Reporting Accurate Information	14
Reporting Financial Issues or Questions	14
Section 4: Our Commitment to Stewardship, Sustainability, Quality, and Communities	15
Product Quality	15
Environmental, Health & Safety Policy	15
Section 5: Avoiding Conflicts of Interest	16
Secondary Employment	16
Working With Family and Friends	17
Ownership or Investments in Other Companies	17
Competing With Olin or Taking Business Opportunities	17
Membership on Boards and Committees	17
Inside Information and Securities Trading	17

Section 6: Gifting, Anti-Corruption, and General Business Practices	19
Meals and Entertainment	20
Operating With Integrity	20
Third-Party Agents, Distributors, and Representatives	20
Spouse and Partner Expenses	21
Fair Competition and Antitrust	21
Offers of Travel and Lodging	21
Gathering and Using Competitive Information	22
Participation in Trade Associations and Conferences	22
Participating in the Global Marketplace	23
Import and Export Restrictions	23
Boycotts	23
Trade Controls	23
Section 7: Special Responsibilities When Working With Our Government Partners	24
Ensuring Integrity in the Procurement Process	24
Classified, Proprietary, and Source Selection Information	24
Performing All Contract Requirements	25
Reporting and Other Requirements	25
Hiring Former Government Employees	25
Political Contributions and Activities	25
Cooperating Fully With Government Inspections and Investigations	25
Special Concerns When Dealing With Public Officials	26
Reasonable Gifts to Public Officials Subject to General Approvals	26
Hospitality, Entertainment, and Travel Expenses for Public Officials	26
Section 8: Contact Info and Resources	27
Employee Assistance Program	27
The Olin Help-Line	27



SECTION 1

Our Values and Our Code of Conduct

Our success as a company is directly linked to our commitment to operate with honesty and integrity every day, in every way, and by every employee. Our Company Values and our Code of Conduct provide the non-negotiable framework for how we operate our business, establishing standards of behavior expected of everyone at Olin, including all of Olin's subsidiaries, and Olin's Board of Directors.

While the Code of Conduct cannot cover every company policy or business situation, it is an appropriate starting point. Consider all laws, the Code of Conduct, Olin policies and procedures, and our Company Values as they apply to our jobs.

Employees who violate our Code are subject to disciplinary action up to and including termination of employment.

Olin's Company Values embody our unwavering commitments.

Olin is **ALL IN**:

WE SAFELY AND RELIABLY
deliver essential materials

WE ACT WITH INTEGRITY,
always doing what is right

WE EMPOWER OUR EMPLOYEES
to take ownership in everything we do

WE CREATE VALUE
for our customers, shareholders,
employees, and communities

Honesty Always

Honesty and openness in all our words and actions are key to everything we do. We must be truthful in our communications, whether verbal or written, and in our actions. We should never lie by making false statements or leaving out the full details as it relates to our jobs. We should not mislead people, and we should not steal.

We are all expected to comply with both the letter and the spirit of our Code. Even if we feel pressured to do otherwise, we must understand and adhere to each company policy, procedure, law, and regulation that applies to our jobs. Our Code also requires us to seek guidance if we have any questions or concerns and to cooperate fully in any investigation of suspected violations of the Code, or Olin policies and procedures that might arise in our work.

Ethical Decision Making

We have models for ethical thinking to guide us through the interactions and decisions that we face when acting on Olin's behalf.

1. Is it legal: What do the laws and regulations require us to do?
2. Is it ethical: What do the Code of Conduct and Olin policies and procedures state?
3. Does it follow the meaning and spirit of our Olin Values?
4. What would our families, communities, customers, and shareholders think?

Speaking Up and Seeking Guidance

Employees at all levels are encouraged to offer suggestions, seek guidance, and promptly raise concerns in good faith without fear of retaliation. Good faith means coming forward truthfully with all the information we have about a situation that we believe violates our Code, an Olin policy, or the law. Generally, your manager is in the best position to help, but there are other people and resources within the company that can help:

- Your manager's manager
- The head of your department, location, or business unit
- The Human Resources Department (+1 314.480.1400)
- Olin's Law Department (+1 314.480.1400)
- Your local Ethics Advisor, Ethics Ambassador¹, or Ethics Officer
- The Ethics & Compliance Office (+1 314.355.8285)
- The Help-Line, Olin's 24-Hour/7-Days-A-Week confidential resource

Employees will also be protected under Olin's No Retaliation Policy when they participate in an investigation. If you experience retaliation or suspect that it may have occurred, you should immediately contact Olin's Ethics & Compliance Office or Olin's Help-Line.

1. At Lake City Army Ammunition Plant

Guidance for Employees and Managers

Managers have an important responsibility to lead by example and maintain the highest standards of behavior. This includes ensuring that those they supervise understand our Code and the policies, procedures, laws, and regulations that affect our business and reputation.

Managers should create an open environment where individuals feel comfortable raising questions, issues, and concerns without fear of retaliation. If an issue is raised, managers are expected to take prompt action to address the concerns and correct any problems that arise, including working with appropriate resources within Olin.





Confidentiality of Reports

To protect confidentiality when it is allowed by law, Olin's Help-Line never uses caller ID, recording devices, web tracking, or any other method to identify any person making a report. The Help-Line service provides a report number, a password, and a follow-up date for anonymous reporters.

Keep in mind that it can be difficult to investigate anonymous reports that do not include enough details or follow up as requested.

How Our Company Investigates Concerns

100% of issues and concerns referred or reported directly to Olin's Ethics & Compliance Office or through Olin's Help-Line service are investigated fully by the company's Ethics & Compliance Office, which assigns investigators based on their relevant knowledge and objectivity.

We are all expected to cooperate fully and truthfully with any investigation. Olin may also use outside resources and involve senior management.

Protection From Retaliation

Coworkers and managers may not harass, discriminate against, terminate, suspend, threaten, demote, or deny benefits for anyone who raises a question or concern, or cooperates in any resulting investigation.

Retaliation can involve:

- Threatening, harassing, or discriminating against someone.
- Terminating or demoting someone when it is not warranted.
- Unreasonably increasing an employee's workload.
- Assigning an employee to the dirtiest or most unwelcome tasks or shifts because it is believed they complained.
- Denying someone, or a group of individuals, benefits or training opportunities for which they would otherwise qualify.
- Ostracizing or excluding someone from meetings, events, or discussions.
- Setting unrealistic deadlines to cause an employee or group of employees to fail.
- Breaching the confidentiality of a report or trying to discover who raised a concern.
- Purposefully shunning, ignoring, or disrespecting a person because they raised a question or concern, or participated in an investigation.

Any form of retaliation is a violation of our Code and will not be tolerated. If you experience retaliation or suspect that it may have occurred, you should immediately contact Olin's Ethics & Compliance Office or Olin's Help-Line. Those who violate our No Retaliation Policy are subject to discipline up to and including termination of employment.

LEARN MORE For additional information about Olin's Help-Line, or to raise a concern, go to OlinHelp.com.

Promoting Opportunity

We believe in promoting a culture of inclusion that values, recognizes, and celebrates the diversity of our people.

Our hiring and promotion decisions are based on the qualifications, skills, and performance of an individual without regard to race (color) or ethnicity (national origin and ancestry), gender or gender identity, religion or creed, mental or physical disability, age, sexual orientation, marital/domestic partner status, medical condition, genetic information, military and veteran status, or other characteristic or activity that is protected by applicable local, state, and/or federal anti-discrimination law.

Our diversity has the greatest impact within an inclusive work environment where every Olin voice has an equal opportunity to be heard, where Olin leaders recognize the accomplishments of all, and where every employee is encouraged to engage in the activities and discussions necessary to run Olin's businesses effectively.

Treating Each Other With Respect

At Olin, we are committed to fostering a workplace where every person is treated with dignity, fairness, and respect. This means that every employee, at every level of the company, has the right to work in an atmosphere that is free from discriminatory practices, harassment, or bullying. We should not insult or disrespect one another, and there is no room at Olin for behavior that is threatening in word or action.



Prohibiting Bullying, Harassment, and Discrimination

Olin does not tolerate bullying behavior in our workplace. We define bullying as persistent, malicious, unwelcome, severe, and pervasive mistreatment that harms, intimidates, offends, degrades, or humiliates employees or anyone engaged in business with Olin, whether verbal, physical, or otherwise.

Examples of bullying may include:

- Verbal bullying: Slandering, ridiculing, or maligning a person or a person's family member(s); persistent name-calling that is hurtful, insulting, or humiliating; using a person as a focus of jokes; and making abusive and offensive remarks.
- Physical bullying: Pushing, shoving, kicking, poking, tripping, assaulting, or threatening to physically assault, and damaging a person's work area or property.

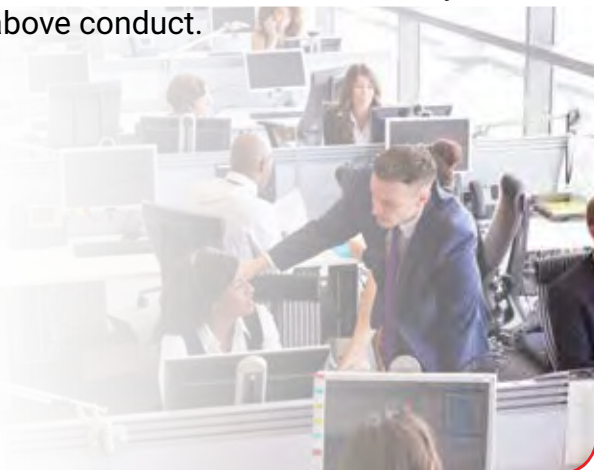
Harassment or discrimination of any individual by any employee or anyone engaged in business with Olin or other third parties over whom the company has control based on a protected characteristic is strictly prohibited no matter where it occurs. We define harassment as any verbal, visual, or physical conduct that denigrates or shows hostility toward an individual because of the individual's lawfully protected characteristics and that has the purpose or effect of violating the dignity of the person concerned, unreasonably interfering with an individual's work performance, or creating an intimidating, hostile, degrading, humiliating, or offensive work environment. Our Zero Tolerance Policy on Harassment is available online at <https://olin.com/harassment>.

Prohibiting Sexual Harassment

We define sexual harassment as unwanted sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; submission or rejection of such conduct is used as a basis for making employment decisions affecting the individual; or such conduct has the purpose or effect of violating the dignity of the person concerned or creating an intimidating, hostile, degrading, humiliating, or offensive environment.

Examples of sexual harassment may include, but are not limited to:

- Unwanted sexual advances or propositions – whether they do or do not involve physical touching.
- Unwanted comments, including comments about a person's body, sexual activities, experiences, perceived shortcomings, preferences, or gender.
- Sexually oriented, suggestive, obscene, or insulting comments, language, or jokes.
- Displaying or possessing in the workplace sexually suggestive, revealing, or pornographic objects, pictures, graffiti, cartoons, or any other materials with sexual content.
- Threats, or promises of preferential treatment, designed to induce submission to or tolerance of any of the above conduct.





Ensuring Our Workplace Is Alcohol- and Drug-Free

Our employees and others working on our premises and worksites, or moving product on our behalf, must not report to work or perform any job duties while under the influence or impaired by alcohol or drugs.

Olin recognizes that some state, local, and international governments have decriminalized the recreational use of marijuana and/or have authorized the use of medical marijuana. Generally, these laws do not modify Olin's position and policy on the use of substances that might impair employees, which remain prohibited. This standard will apply internationally to the extent allowed by employment contracts and national laws of the locations where Olin does business.

The use, possession, distribution, transfer, or sale of alcohol or unlawful substances remains strictly prohibited while on duty or while on the company's premises.

Employee Assistance Programs (EAP) are available globally wherever Olin has operations and offer confidential counseling services to any employee or family member of an employee who needs help with personal problems. See Contact & Resources section of this code.

While on the premises of Olin, performing company business, or operating a vehicle or other potentially dangerous equipment owned or leased by the company, no employee or contractor may be impaired by any drug or substance.

Special Responsibilities for Managers Regarding Harassment, Discrimination, Bullying, Violence in the Workplace, or Substance Abuse

All Olin managers have a specific responsibility to report potential cases of harassment, discrimination, bullying, violence in the workplace, or substance abuse immediately to the appropriate location's Human Resources Department.

Managers must report these situations even if the circumstances of the complaint or situation are unclear and cannot be immediately substantiated. Prompt reporting and investigation by an impartial third party are critical to stopping harassment, discrimination, or bullying before it becomes severe or pervasive.

Corporate Social Responsibility and Protecting Human Rights

We strive to be known as a trusted neighbor in the communities where we live and operate. We know that maintaining an open, ethical stance while also respecting diversity, local and native cultures, and regional or multicultural customs can make a positive difference.

As part of our commitment to good business practices worldwide, Olin's Human Rights Policy outlines our company's commitment to uphold individual human rights, native rights, and the respect of human dignity as important foundations in all of our operations and activities. We provide reasonable working hours and fair wages for those who work on our behalf. We also have zero tolerance for the use of child or forced labor or human trafficking practices. We comply with all laws and regulations regarding the protection of at-risk classes and avoid the use of materials associated with identified conflicts. We expect our suppliers, consultants, contractors, subcontractors, and other business partners to uphold the same standards.

SECTION 3

Protecting Our Data and Assets

Protecting Our Employees' Privacy

Olin respects all employees' privacy and will handle personal data responsibly and in accordance with our policy and all applicable data privacy laws and regulations. Access to personal data is restricted, and our company will protect it from loss, misuse, unauthorized access or disclosure, alteration, or destruction.

While Olin respects employees' privacy, our company reserves the right to inspect our facilities and property, unless prohibited by local law or regulations.

Safeguarding Olin's Assets and Use of Company Resources

Each of us is responsible for protecting and preserving Olin's resources. We must make sure that we use company resources only for business purposes – never for personal financial gain. Any form of theft, fraud, or embezzlement is prohibited. We must also be sure that we have appropriate approval for any personal, community, or charitable use of these resources.

Privacy of Customer and Consumer Information

We each have obligations under data privacy laws to protect customer and consumer information that is provided to us. We only access this information when we have a business reason to do so or to comply with laws and regulations.

Suppliers and other outside parties who have authorized access to this information are also responsible for protecting this information, and we require compliance.

Use of Social Media

Because communications made public on a social media site are instantaneous and permanent, inappropriate use of social media can expose our company – and us – to significant liability.

Social media guidelines to consider:

- Know and follow our Code.
- Use common sense.

- Preserve our network resources for business-related activities.
- Do not speak on Olin's behalf unless you have been specifically authorized to do so.
- If you post comments endorsing our products, clearly disclose that you work for Olin.
- Be alert to disparaging posts about our company's products and services, but do not respond on your own; instead, notify the Olin Communications Department or Law Department.
- Do not disclose our company's confidential information.
- Never post obscene, threatening, criminal, or harassing comments, or make any comments based on others' protected characteristics or that are maliciously untrue. Never post materials for the purpose of damaging Olin's brand, customers, suppliers, or vendors as related to the products and services offered to customers.
- Respect copyrights. Do not post intellectual property owned by others unless we have permission from the owner, including photographs and images.

Disclosing Information to the Public

Olin strives to communicate with the public in an accurate and consistent manner. To be sure that we comply with all public disclosure laws and regulations and protect the interests of our company, statements to the public or media on behalf of the company may only be made by those employees specifically authorized to be company spokespersons.

Inquiries from investors or security analysts, either verbal or written, should be referred to Olin's Investor Relations office. Inquiries relating to other matters, including requests for information from the media, should be directed to an Olin Communications contact.

Confidential Information

Some of our company's most valuable assets are intangible and include our trade secrets and confidential company information. We must not disclose these assets to outsiders, including outside companies like those who provide AI chatbots, unless there is a clear business purpose or justification for the disclosure, and a company-approved confidentiality agreement has been signed by the recipient. In addition, we must only discuss business matters in private with authorized personnel, and not with family and friends.

Safe and Appropriate Use of Our Networks

We each have the responsibility to protect our company's networks and information, following the data protection and information security rules related to network systems, company computers, and other electronic devices.

All devices connected to our company's network must have appropriate access protection and be equipped with approved web filtering software, and vulnerability scanning software. Olin-provided workstations and mobile devices dedicated to the business network for email, Internet, and other day-to-day data services cannot be connected to the production and/or operational technology networks that control manufacturing and production processes.

We must also be sure that our portable devices, such as laptop computers, smartphones, and storage devices, are always secured and that any confidential information stored on these devices is password protected. If we suspect that any of our data has been tampered with or is missing, we are obligated to report what we know to our manager and the IT Department immediately.

Our networks and information systems are for company-related business purposes. In locations where limited personal use is acceptable, all personal usage must conform to our Code and not interfere with our job responsibilities or the safe operations of our network.

Some examples of confidential information include:

- Undisclosed financial information and earnings reports
- New product offerings
- Customer lists
- Product costs and volumes
- Marketing, pricing, or service strategies
- Procurement plans
- Commercial business negotiation information
- Capital requirements and plans
- Merger, acquisition, divestiture, or business plans
- Confidential technical data and product performance information
- Proprietary or classified government information
- Supplier and subcontractor commercial information

Intellectual Property and Copyrights

Our intellectual property consists of our patents, copyrights, trademarks, and trade secrets, as well as designs for products and software programs created by other companies that are copyrighted or otherwise restricted.

We must vigorously protect our intellectual property rights as well as the rights of others. We can do this by fully documenting product development research and using appropriate company trademarks, copyright notices, and patent notices on all correspondence, articles, manuals, or other papers.

In order to protect the intellectual property rights of others, we must:

- Use only authorized copies of software.
- Avoid asking new hires for trade secrets belonging to their former employers.

- Check carefully to be sure we have authorization to use trademarks belonging to other companies.

Integrity in Recordkeeping and Reporting Accurate Information

Our company's documents and electronic files are important assets. We are each responsible for the integrity and accuracy of the records, as well as their appropriate storage.

Olin is committed to full, fair, accurate, and timely disclosure in all reports and communications with government agencies and the public. All accounting information must reflect actual transactions and conform to generally accepted accounting principles. Company records exist in many formats, including voicemails, paper documents, email, and electronic files stored on computers, mobile phones, or any other medium (CD, DVD, USB storage devices, etc.).

Do not falsely sign, create, or modify information on any record or document, or intentionally make a false or exaggerated statement to anyone. We must never tamper with company records or remove or destroy them prior to the dates specified in our Records Retention Rules, including any rules related to Legal holds.

Reporting Financial Issues or Questions

If you encounter questionable accounting or auditing practices, they should be reported immediately to your manager or a higher-level manager in our organization and also to Internal Audit, the Ethics & Compliance Office, or Olin's 24-Hour Help-Line service.

All books and records of our company are subject to review and independent audit. If asked to respond to requests by internal auditors, legal staff, independent accountants, or special counsel, our responses must be complete and truthful. We must disclose all relevant – or potentially relevant – information, even if the request is not specific as to what information is required.

Our Commitment to Stewardship, Sustainability, Quality, and Communities

At Olin, we understand that integrating stewardship toward people and the environment in a sustainable manner is paramount in our privilege to operate. Olin's Board of Directors has responsibility for oversight of our sustainability and stewardship efforts. Our commitment and goals relative to sustainability align with the UN Sustainable Development Goals.

Product Quality

The integrity and quality of our products and services are fundamental to the reputation of our company and the ultimate success of our businesses. All of our products and services must meet appropriate inspection, testing, and quality criteria in accordance with contract and government requirements.

We must complete all test documentation accurately and promptly. We must never:

- Falsify, alter, or distort any inspection or test documentation or software.
- Improperly or erroneously record inspection or test results.
- Mislead any customer's representative.
- Use incomplete or improper inspection or testing protocols or procedures.

Environmental, Health & Safety Policy

The safety of our people and our processes, as well as responsible stewardship of the environment, are critical to our operation.

Our leadership visibly performs and guides the organization to conduct business in a manner that protects and increasingly benefits our employees, business partners, the communities in which we live, and the world around us. All employees are accountable for embodying responsible citizenship through active engagement in the Olin Environmental, Health & Safety (EH&S) process.

Each of us is responsible for supporting Olin's commitment to EH&S excellence. Olin's extensive and ongoing EH&S training programs help ensure every employee is actively engaged in the EH&S process.

SECTION 5

Avoiding Conflicts of Interest

Each of us, at every level of the company, must avoid situations that place our personal interests in conflict with the interests of Olin. In order to maintain our company's good reputation – and our own – we should avoid participating in outside work activities that raise even the suggestion of a conflict of interest and disclose any potential conflict to our manager as soon as we become aware of it.

Potential conflicts of interest should be referred to an executive officer, division leader, or the Ethics & Compliance Office for determination as to whether there is a conflict.

Secondary Employment

Secondary employment must not interfere or conflict with our responsibilities at Olin. Olin policy does not permit us to work for or provide services to any current or potential Olin competitor, customer, or supplier without prior approval from management. This policy also applies to any family member, including a spouse, child, sibling, parent, grandparent, stepchild or stepparent, as well as mother-, father-, son-, daughter-, brother- or sister-in-law, and any other person living with you, except tenants and household employees.

Independent business activities, such as operating a part-time or “side” business, have the potential to create a conflict if the business activities compete



with Olin's interests or reflect negatively on Olin. For this reason, if you have a side business that you fully or partially own, the business may not act as a supplier to Olin or to a current or potential Olin competitor, customer, or supplier without advance disclosure and approval.

Officers of Olin Corporation may not serve as a directors, officers, employees, partners, consultants, agents, or representatives of a business concern not affiliated with Olin without prior approval of Olin's Board of Directors.

Working With Family and Friends

To avoid conflicts of interest with the work activities of family members, Olin does not generally allow the direct supervision of a family member. Where family members work in the same department or location, those job duties and overtime assignments must be based on objective criteria and pay decisions, and job performance evaluations are handled by an independent person.

We should also be aware that a conflict of interest may exist, or appear to exist, in situations where a family member works or performs services for an Olin competitor, customer, or supplier, especially if you or someone who reports to you has business dealings with the company or family member. You should always report questionable situations to your manager as soon as you become aware of them to avoid even the appearance of a conflict in your dealings with family.

Ownership or Investments in Other Companies

Olin respects our right to invest in other companies as long as these financial interests do not affect our judgment or activities on behalf of Olin or jeopardize Olin's reputation. For this reason, neither we nor any of our family members may have a significant investment in any business concern that does or seeks to do business with our company, or any competitor of our company, unless it has been fully disclosed in writing to management and a determination has been made that a conflict of interest does not exist. Even in the absence of a financial interest in another business organization, we should be aware that the potential for a conflict of interest may exist if we or a family member receives a significant benefit, such as substantial commissions or bonuses from another organization doing business with Olin.

A "significant financial interest" is a 10% or more ownership interest in, involvement with (including as a director, officer, or partner) or obligation to or from any business organization that does or seeks to do business with Olin. A "business organization" includes any not-for-profit entity to which Olin makes contributions and any competitor of Olin.

Competing With Olin or Taking Business Opportunities

We are expected to promote Olin's interests when the opportunity to do so arises, including situations where we personally benefit from an opportunity that we developed or learned about during our employment with Olin or offer the benefits to another person or organization.

A conflict of interest may also exist (even if we do not personally benefit) if we were to offer the benefits of the opportunity to another person or organization other than Olin.

Memberships on Boards and Committees

Olin encourages us to participate in professional organizations and community activities.

However, our participation must not jeopardize our company's performance, brand, or customer image, or distract us from the performance of our jobs. We are not required to obtain approval for serving on the board of a nonprofit organization as long as the organization does not receive contributions or other payments from Olin, and our activities do not conflict with our job responsibilities or reflect negatively on Olin. Advance approval is required for service on the board of directors of any other organization.

Inside Information and Securities Trading

From time to time, we may have access to material inside information about our company or other companies with whom we do business. "Material inside information" is information that may not be available to people outside of Olin, but that a reasonable investor would consider important.

Securities laws, local laws and regulations, and Olin policy prohibit us from using inside information to influence our own or anyone else's investment decisions regarding Olin or any other publicly traded company. For this reason, we must be careful not to trade in any publicly traded securities, including Olin's, whenever we believe we are in possession of material inside information. If we have any questions about whether we are in possession of material inside information, or if it is permissible for us to trade, please consult Olin's Law Department. We must also be careful not to "tip" anyone else who could disclose the inside information to others.

Further details can be learned within Olin's Insider Trading Policy, but some examples of material inside information include:

- Unpublished financial results, reports, or projections such as earnings estimates or results, or a change in previously announced earnings estimates.
- News of a pending or proposed merger, acquisition, divestiture, or tender offer.
- Changes in top management.
- Changes in dividend policy, declarations of stock splits, or offerings of securities.
- Calls, redemptions, or purchases of Olin's own securities.
- Changes in prices or demand for the company's products, or changes in the costs of producing, transporting, or selling the company's products.
- Unusual or large borrowing.
- Liquidity problems.
- Significant new products or services or other changes in operations.
- Commencement or settlement of a major claim or lawsuit.
- Gain or loss of a substantial customer or supplier.
- Significant litigation, governmental investigation, or other governmental action.
- Industry information (i.e., prices, volumes, or other conditions affecting our business).
- Initiation or settlement of labor negotiations or disputes, strikes, or lockouts.
- Information relating to the company's stock repurchase programs or their execution.
- Data privacy breaches or other cybersecurity incidents.



Gifts, Anti-Corruption, and General Business Practices

Although exchanging gifts can help to build strong working relationships with our various business partners, it also has the potential to create a conflict of interest. For this reason, any gifts that we offer or accept in a business relationship must be reasonable, infrequent, and valued at less than U.S. \$100. What may be considered reasonable by law or custom in some countries might be considered extravagant in others. If ever in doubt, consult the Ethics & Compliance Office.

Gifts also include tickets to entertainment venues when the host or provider is not in attendance, regardless of whether the Olin employee is providing the gift or receiving the gift.

Certain gifts are never acceptable:

- Gifts of anything of value for the purpose of influencing the receiver to misuse his or her position in a way that benefits Olin.
- Gifts that are solicited or offered in exchange for personal gain or unfair business advantage.
- Gifts in cash or cash equivalents, such as stocks, bonds, stock options, loans, or certificates redeemable for cash (e.g., gift cards).

- Gifts that are illegal, sexually oriented, or would violate our commitment to mutual respect.

A gift that exceeds the U.S. \$100 limit may be offered or accepted in certain limited situations. Usually, these situations involve a group event attended by an Olin employee and representatives of other companies where the item is provided to all attendees. There may also be a situation where a more expensive gift item is presented in recognition of a special event or milestone.

There may also be circumstances where a gift of more than U.S. \$100 may be won in connection with a random drawing at an event or competition. In such cases, we may retain the gift so long as the drawing or competition was available to all participants, the drawing was truly random and won fairly, and the prize is reasonable in value. Such prizes must be disclosed to our supervisor; and in some cases, we may be requested to decline the prize even if otherwise allowed by Olin's policies or procedures.



Meals and Entertainment

We may offer or accept meals, hospitality, and entertainment in connection with a business relationship as long as they are reasonable and customary with respect to frequency and cost, infrequent in nature, not lavish or extravagant, and the provider is in attendance. If the provider is not in attendance, anything offered or given is considered a gift and is subject to Olin's gift limitation.

To be in connection with Olin business, the meal or entertainment must meet one of the following requirements:

- Relate to the promotion, demonstration, or explanation of Olin's products or services.
- Relate to Olin's or a business partner's execution or performance of an Olin contract.
- Directly relate to the creation, strengthening, or continuation of a business relationship and business discussion with the business partner.

In addition, since we are representing our company, the entertainment must not violate Olin's Code or the business standards of the other party, nor include any establishment or activity that would reflect negatively on Olin. Please contact the Ethics & Compliance Office for advice if you are concerned or have questions about a possible gift.

Operating With Integrity

We never resort to bribery or other corrupt practices. Because the consequences of bribery can be severe, we must each know and strictly follow the anti-corruption laws applicable to our job duties. Olin policy prohibits us from offering or accepting anything of value to anyone for the purpose of influencing actions in a way that improperly benefits Olin. "Anything of value" is very broadly defined and can include things such as cash, gifts, meals, entertainment, travel and lodging, personal services, charitable donations, political contributions, business opportunities, favors, or offers of employment. Bribery has no minimum monetary threshold, so any amount could be considered a bribe. Olin policy prohibits bribery in all forms, no matter what we call it, from kickbacks to facilitation payments.

Third-Party Agents, Distributors, and Representatives

Just as we do not pay bribes, we may never hire or ask a third party to do something that we may not ethically or legally do ourselves. A third party may be a consultant, agent, representative, contractor, accountant, attorney, etc. on Olin's behalf.

Employees and third parties alike should refuse any request or demand to participate in illegal conduct. If requested to participate in such conduct, report the matter to a manager or Olin contact and the Olin Ethics & Compliance Office. Our reputation for integrity is more important than the profit from any contract or individual business relationship.

Watch for these signs that a payment may be corrupt:

- A request that a commission be paid in cash, in another name, or to an address in a different country.
- An agent is demanding a higher-than-normal commission for a transaction.
- Any agent or salesperson who says they are working with a government official to give our company the contract.
- References to family members or friends helping Olin when those individuals are government officials.

Watch out for the following "warning flags" when selecting third parties:

- A history of corruption in the country where a third party is being hired.

- Third parties with family or other relationships that could influence the buying decision.
- Third parties with a reputation for corruption or improper conduct.
- Unusually high commission requests.
- A third party who makes an approach near the award of a contract and indicates a “special arrangement” with a government official, political party, or other official.
- A customer who suggests that an Olin bid be made through a specific agent or representative.

Spouse and Partner Expenses

Generally, we may not expense spouse and partner expenses as business expenses. In rare cases, Olin may choose to reimburse us for such expenses where a Corporate Officer or the Ethics & Compliance Office has pre-approved such expenses after determining that Olin would not be best represented without the spouse or partner. We must receive and maintain written authorization from a Corporate Officer indicating the specific business benefits achieved by their attendance.

Review section 7 for more information on special concerns when dealing with public officials.

Fair Competition and Antitrust

We believe in free and open competition. In most of the countries where we operate, strict laws are in force.

We must all understand the basic requirements of the competition laws that apply to our business activities.

Never talk to or exchange information with competitors or with customers, distributors, or suppliers who are also competitors about:

- Prices or credit terms.
- Suppressing, rotating, coordinating, or submitting or not submitting bids.
- Costs, profits, or margins.
- Dividing markets (by geography, product, or otherwise), orders, or customers.
- Limiting production or sales volume.
- Distribution methods or allocations.
- Technology roadmap or future plans for product/service development.
- Boycotting a supplier, customer, or competitor for commercial reasons.
- Not hiring or not poaching employees or contractors.

In addition, we must always consult with Olin’s Law Department before proposing or entering into any agreements or understandings that:

- Require suppliers or customers to conduct business with Olin before we will purchase from or sell to them.

Offers of Travel and Lodging

We may not accept gifts of commercial transportation, lodging, or other living and travel expenses unless the expenses are reasonable and in connection with Olin business, the employees in the offering party are present for the business, and the activity is approved in advance by a Corporate Officer or the Ethics & Compliance Office. Such approval is not required in the case of the reasonable cost of transportation within a city to attend meetings, entertainment, and meals.



- Restrict a customer's choices in using or reselling our products or services.
- Require a customer to purchase one Olin product or service as a condition of purchasing another Olin product or service.
- Restrict any party's freedom to conduct business with or produce or provide any product or service with any other party.
- Restrict the freedom of a licensee or licensor of any patent, copyright, or licensing arrangement.

Gathering and Using Competitive Information

Learning about our competitors is good business practice, but it must be done fairly and ethically, and in compliance with all laws and regulations. We should seek competitive information only when there is a reasonable belief that both the receipt and the use of the information are lawful. Competitive information includes anything related to the competitive environment or to a competitor's products, services, markets, pricing, or business plans.

Legitimate sources of competitive information include publicly available information such as news accounts, industry surveys, competitors' displays at conferences and trade shows, and information publicly available on the Internet.

We may also gain competitive information appropriately from customers and suppliers (unless they are prohibited from sharing the information) and by obtaining a license to use the information or actually purchasing the ownership of information.

We must never seek or use:

- Information obtained by unethical or illegal means, including theft, bribery, eavesdropping, or unauthorized recording of a customer or supplier.
- Proprietary information that has been copied, drawn, or photographed.
- Information obtained in exchange for compensation, employment considerations, gifts, or anything else of value.
- Information about a former employer solicited from a new hire.
- Information containing technical or engineering data that may be protected by trade secret laws.



Participation in Trade Associations and Conferences

Olin is a member of various industry and trade associations in which employees of our company meet with employees of our competitors to discuss issues of common concern to the industry. Because these meetings involve contact with our competitors, they raise issues of compliance with antitrust and competition laws. If we attend trade association meetings or serve in any capacity on committees, we must avoid any formal or informal discussion regarding prices, discounts, terms and conditions of sale, exclusion of members or standardization of terms, product specifications, or warranties.

If we become aware of any discussion of these issues at a trade association meeting, we should immediately leave the room and contact Olin's Law Department.

Participating in the Global Marketplace

As a global company, there will be times when local laws and customs may conflict with each other or with our Code and policies. If this situation occurs, always seek advice from a manager, the Law Department, or Olin's Ethics & Compliance Office. Those of us who engage in international business are responsible for knowing the laws and regulations of countries in which we operate, as well as all applicable Olin policies. If there are any questions about which law, regulation, or policy to follow, we should contact Olin's Law department.

Import and Export Restrictions

As an international company, Olin ships products and materials across country borders on a regular basis. In all of our business activities, we must obey all applicable laws on imports and exports, including any product, software, technology, or piece of information that we ship, transmit across borders, or provide to a citizen of another country or employee of a foreign company.

Boycotts

It is Olin's policy to comply with U.S. anti-boycott regulations. We may receive a request – commonly as part of a contract – to boycott a certain country or company. Olin is subject to the anti-boycott provisions of U.S. law that require us to refuse to participate in boycotts that the U.S. does not sanction. Under the law, we cannot cooperate with any boycott request that is outside the sanctions described above. For this reason, we must not initiate any action, provide any information, or make any statements about countries, companies, or other entities that could be misinterpreted as cooperating with an illegal foreign boycott. All boycott requests must be reported immediately to Olin's Law Department.



Trade Controls

Trade controls affect our international transactions, including exports and re-exports of products, technology, and software, as well as imports, travel, new investments, and other financial transactions or dealings with sanctioned countries, regions, entities, or individuals. It is Olin's policy to comply with all applicable international trade controls that govern its business operations.

Accordingly, we must not engage in international transactions with persons or entities from designated sanctioned countries or regions without specific advance written authorization from the Olin Law Department, Export Compliance Department, or International Trade Operations. We must follow all applicable trade control restrictions in all of the countries where we operate. All transactions must be screened in advance to ensure compliance with U.S. and relevant local country laws, and that parties to transactions do not include any of the following:

- Embargoed countries or regions and individuals or entities listed on the applicable restricted party lists.
- Arms proliferation-related end-users or parties (persons or entities) named on the U.S. Department of Commerce, Treasury, and State Department restricted and prohibited lists.
- Any party known or believed to be acting in violation of relevant laws and regulations.

SECTION 7

Special Responsibilities When Working With Our Government Partners

When we work with government agencies and public officials from any country or are involved in bidding on or providing supplies or services under a government contract, we must also keep in mind that conduct which may be considered acceptable in the commercial sector may not be acceptable under government procurement laws or regulations. The rules relating to gifts and entertainment in the government marketplace are far more restrictive and prohibitory than those that may apply commercially.

Violations in the government marketplace can result in harsh consequences, such as fines, monetary penalties, termination of contracts, debarment or suspension from competing for government contracts, and, in egregious situations, criminal prosecution of the company or individuals.

Ensuring Integrity in the Procurement Process

We must deliver our products and services in a manner that fully complies with government procurement laws and regulations, which may vary from agency to agency. Therefore, if our job involves government procurement, we must know and follow the special procurement rules, which may require:

- Faithful and strict conformity to all contract specifications and requirements.
- Adherence to any testing, inspection, or quality assurance requirements, including full cooperation with any government inspector.

- Accurate and complete records relating in any way to government contracts, including production records, equipment logs, inspection records, testing records, timecards, and invoices.

Classified, Proprietary, and Source Selection Information

We must follow all security regulations of the U.S. government and any other government with jurisdiction over our operations. These regulations cover such things as plant and office security, data transfer, basic day-to-day actions, and the proper handling of classified information.

If applicable, access to classified information is strictly limited to only those individuals with appropriate government security clearance and a valid need to know and must be handled and stored according to strict standards and procedures. We must report actual or potential security violations immediately to our location's Facility Security Officer, Olin's Ethics & Compliance Office, or Olin's Law Department.

U.S. government laws and regulations also prohibit us from soliciting or obtaining third party "proprietary" information such as cost or pricing data, as well as "source selection" information, such as bids, technical evaluation plans, and other sensitive information and documents. If we believe that classified, proprietary, or source selection information has been acquired, we must immediately report the situation to our manager or Olin's Law Department.

Performing All Contract Requirements

When Olin accepts government contracts and subcontracts, we have an obligation to ensure that we administer those contracts honestly, appropriately, and legally. This means that if we have responsibilities related to any government contracts, we are each responsible for knowing and complying with the requirements of the contract. Deviating from a contract's specifications without authorization, improperly substituting products or components, or neglecting to perform required tests and inspections are all prohibited.

Cooperating Fully With Government Inspections and Investigations

We cooperate with government inspections and are courteous to inspectors. We must notify the Law Department immediately if we learn about any inspections, investigations, or requests for information from any outside organization.

During an inspection, we must never destroy or alter any documents, lie to or mislead an inspector, or obstruct the collection of information. The Law Department should assist in reviewing any information requested by an inspector before it is released.

Reporting and Other Requirements

We are required to internally report any known or suspected contract violation any time there is credible evidence that we have violated a law or been overpaid – whether deliberately or as an honest mistake. In these situations, we must raise the issue with our manager and Olin's Law Department.

Hiring Former Government Employees

Certain laws and regulations may restrict Olin's ability to hire recent government employees involved in awarding or administration of Olin contracts. We should contact the Human Resources Department before we have any formal or informal discussions with current or former government employees about the possibility of working for Olin. If you have questions about this hiring policy, contact Human Resources or the Ethics & Compliance Office.

Political Contributions and Activities

Olin respects the value of the political process, but our political activities must be limited to our personal time and resources.

Olin will not make any contributions to political parties, candidates, or public officials, except as permitted by law. Contributions made by individual employees, agents, or other representatives will not be reimbursed by Olin, even when made in Olin's name.

When dealing with any government official, closely review Olin's policies regarding anti-corruption, gifts, entertainment, hospitality, and travel – as well as those regarding the company's travel, entertainment, and small procurement controls.

However, Olin does have a Political Action Committee (PAC) to which some U.S. employees may contribute. The PAC can legally make campaign contributions to political candidates and organizations in the United States. All employee contributions to the PAC are completely voluntary.

With the exception of the PAC, we should not use company time or resources for political activities.

Special Concerns When Dealing With Public Officials

It is unlawful for Olin or its employees and third parties to offer or give anything of value to public officials for the purpose of influencing them to misuse their position in a way that benefits Olin.

Various laws exist around the world restricting gifts and entertainment to public officials, with the restrictions in some jurisdictions more stringent than others. In the United States, the federal government and some state or local government laws prohibit the offer of anything of value to a government employee other than business-related meals or refreshments that are served to participants in a meeting at which government employees may contribute to a fair share of the expense. Therefore, keep in mind that gifts, hospitality, entertainment, and travel expenses provided to officials and employees of the municipalities, states, and federal governments of the United States and other countries, are highly regulated and often prohibited. For this reason, we should not provide any gifts or entertainment, regardless of value, to any government employee or official unless we know that such gifts or entertainment are specifically permissible under Olin's policies, procedures, and any applicable laws and regulations. If a company is state-owned (meaning, the government owns 10% or more of the company or controls the business), any employee of that company should be treated as a government employee.

Where allowed by law, gifts, hospitality, entertainment, and travel offered or provided to public officials must be reasonable expenses

that relate to the promotion, demonstration, or explanation of Olin's products or to Olin's execution or performance of a contract. Before offering any gifts, hospitality, entertainment, or travel to any government employee, seek and maintain written approval from the Ethics & Compliance Office. Such approvals may be granted on a case-by-case basis or in a general approval. The written approval must specify the type of action approved and any related cost limitations.

Reasonable Gifts to Public Officials Subject to General Approvals

In many countries, the Ethics & Compliance Office will grant general approval for small promotional gifts of nominal value such as pens, tote bags, caps, etc. to public officials, employees of state-owned enterprises, or others as a courtesy and to promote goodwill.

Reasonable gifts may also be given as tokens of esteem or gratitude, but they must be given openly and transparently and properly recorded in the company's books and records. They must also be given only where appropriate under local law, customary where given, and reasonable for the occasion. Offers of gifts to public officials must be approved in advance in writing by Olin's Ethics & Compliance Office and list the details of the type and extent of the gifts to be given.

Hospitality, Entertainment, and Travel Expenses for Public Officials

Generally, Olin may pay for the reasonable costs of hospitality and travel expenses when these expenses relate to the promotion, demonstration, or explanation of Olin's products or are related to Olin's execution or performance of a contract. However, when such expenses are to be provided for public officials, they must be approved in advance by the Ethics & Compliance Office.

All forms of adult entertainment are prohibited. Travel expenses for the spouse or family members of a public official will generally be denied. Travel expenses that include any stops or destinations unrelated to the direct promotion and marketing of our products are not acceptable.

Contact Info and Resources

Employee Assistance Program

Olin's Employee Assistance Program (EAP) provides all employees and their immediate family members 24/7 access to confidential professional counseling at no cost for a range of issues including stress, mental fatigue, alcohol or drug abuse, family conflicts, and more. Please contact the Corporate Benefits Department or your Human Resources Business Partner for program details.

The Olin Help-Line

The Olin Help-Line is a confidential telephone and Internet reporting service available to employees and other stakeholders. Where allowed by local law, individuals may ask questions and raise concerns anonymously. The Help-Line is available 24/7, and translation services* are provided.

The Help-Line is available online at www.OlinHelp.com and by calling the toll-free numbers below.

United States: 1-800-362-8348

Australia: 1-800-13-5708

Brazil: 0800-047-4146

Canada: 1-800-362-8348

Chinese Mainland: 400-880-1487

Germany: 0800-724-3565

Hong Kong SAR – China:

800-93-2266**

Italy: 800-902432

Japan: 0120-944048

Mexico: 001-800-658-5454**

The Netherlands: 0800-020-1701

Singapore: 800-011-1111**

Switzerland: 0800-00-0528

Taiwan: 00-801-102-880**

Other Countries: 1-770-810-1127
(Call the USA Collect)

*Translators are available in most languages

**Dial 800-362-8348 when you hear English





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