



WORKING WITH OLIN

BUSINESS PARTNER CODE OF CONDUCT

Dear Olin Business Partner:

We deliver essential materials and solutions that enhance and protect lives, while always maintaining ethical standards. Our commitment to always acting with integrity has facilitated long-lasting relationships with our customers, distributors, suppliers, and business partners. As we expect every Olin employee to operate with the highest standards of integrity, we have the same expectations for those with whom we do business.

For this reason, Olin has a Business Partner Code of Conduct that outlines our core values, and the standards of business conduct expected of you when working with us or on our behalf.

If you have questions about the content herein or need guidance on meeting the standards, please contact the Olin employee with whom you work or reach out to our Olin Help-Line service. Your questions and comments help us improve our processes and become a better company.

Thank you for your commitment to operating with the highest standards of integrity.



Kenneth Lane
President & CEO
Olin Corporation



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OUR COMMITMENT TO ETHICS & COMPLIANCE

Purpose

The Olin Business Partner Code of Conduct defines the behavior we expect from our business partners when conducting business with us and on our behalf. Our business partners include independent agents, consultants, contractors, and all others operating on our behalf. This Business Partner Code of Conduct is an extension of Olin's Code of Conduct and its foundational values: 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, and we create value for our customers, shareholders, employees, and communities.

Olin reserves the right to verify compliance with the Code through internal or external assessment mechanisms. We thank you for your compliance with this Code of Conduct and look forward to a mutually beneficial relationship with all of our business partners based on the highest levels of ethical behavior.

Uncompromising Integrity

At Olin, we recognize that integrity is the key to long-term business success. It also forms the basis for the strong relationship between Olin and you, our business partner. We rely on you to share in this commitment to doing what's right and operating with integrity in every aspect of your business. Never compromise your integrity or ours.





Complying with Laws and Regulations

Olin is committed to complying with all laws and regulations that apply to our operations. We expect you, as our business partner, to do the same and operate your business in accordance with all applicable laws and regulations, as well as in accordance with the standards set out in this Business Partner Code of Conduct and ensure that your vendors and suppliers do the same as it relates to compliance with laws and these principles.

Raising Issues and Reporting Concerns

Regarding your business with us, we expect you to report any suspected violations of regulations, laws, and this Business Partner Code of Conduct— whether the violation came from inside or outside of your organization. Don't hesitate to let us know about anything that causes you concern.

Your Olin contact may be the best person to address your question. However, you may also raise issues or report concerns to Olin's Ethics and Compliance Office at Ethics@olin.com or to Olin's 24-hour Help-Line service. The Help-Line is operated by an independent outside company to address confidentiality concerns, allowing individuals to make an anonymous report when that is preferred and allowed by law.

The Olin Help-Line

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

ETHICAL BUSINESS PRACTICES

Preventing Bribery and Corruption

As our business partner, we expect that you will never offer, accept, or give anything of value to anyone to improperly influence a business decision or gain an unfair advantage for Olin. That means knowing and following all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, the UN Convention Against Corruption, the OECD Convention on Combating Bribery of Foreign Government Officials, and all other applicable anti-corruption laws. Olin also prohibits facilitating payments to public officials to expedite government actions, and we expect you to do likewise with respect to any work you perform for us.

Competing Fairly

Fair trade laws vary by country, but in most of the countries where we operate, strict laws are in force that are similar to antitrust laws in the United States and competition laws in the European Union. Penalties for violations can be severe, including jail time and large fines. It is critical that you, as our business partner, understand the basic requirements of antitrust and competition

laws. In doing business with us, avoid any activity that might give the appearance of an improper agreement to restrain trade— especially if we compete with you. Never seek to give us information or use information on our behalf that is unethically or illegally obtained, such as through theft, bribery, eavesdropping or unauthorized recording, or information that is protected by trade secret laws or obtained through a competitor's bid or a new hire.

Conducting Business Internationally

Olin must comply with all applicable international trade laws on imports and exports, especially those of the United States. If your work as our business partner involves importing, exporting, transporting internationally, selling, or distributing Olin's products or products on Olin's behalf, we expect you to understand and comply with all relevant international trade control laws. This includes following U.S. anti-boycott laws and any other U.S. restrictions and sanctions that relate to doing business with foreign countries.



Government Contracting

We must always ensure that we deliver our products in a manner that fully complies with government procurement laws and regulations. For business partners working on U.S. government contracts with Olin, we expect you to comply with U.S. laws and regulations that apply to you as part of our contracting process, such as the Federal Acquisition Regulation (FAR), the Anti-Kickback Act, the Truth in Negotiations Act (TINA), and the Procurement Integrity Act (PIA).

Avoiding Conflicts of Interest

In doing business with Olin, we expect you to avoid conflicts of interest. This means that personal, financial, business, or other activities must never make you biased or partial as a business partner in a way that negatively affects the work you do for Olin. We recognize that in some situations, your interests may not fully align with Olin's interests, such as suppliers who are also Olin's competitors or who have family relationships, business opportunities, or membership on boards and committees that may impact business with Olin. In these cases, we ask you to disclose to us any potential conflicts with Olin as soon as you become aware of them.

Providing Gifts, Entertainment, and Hospitality

Gifts to public officials in some countries, including to U.S. government employees, may be prohibited. If you offer entertainment or hospitality to others on Olin's behalf, whether to government officials, if legally permissible, or to non-government parties, Olin expects that such entertainment or hospitality will not be inappropriate or extravagant or negatively reflect on our company. In addition, we expect that it will be consistent with customary business practices in the location where the gift is made and the entertainment or hospitality takes place. Olin specifically prohibits sexually oriented entertainment or gifts as well as entertainment or gifts that exploit a person's ethnic identity, race, or religion. We ask that you not offer such entertainment or gifts on Olin's behalf or to Olin's employees.

OLIN'S REPUTATION & ASSETS

Protecting Intellectual Property

Intellectual property laws provide an incentive for the creative efforts and research and development that support innovation. Olin will vigorously protect our intellectual property, including 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 expect you to prevent the misuse, discussion, or disclosure, in each case, whether formal or informal, to unauthorized persons of any Olin proprietary information that you gain access to in the course of business with Olin.

Using Olin's Assets and Property

We expect our employees and business partners to use Olin's resources only for Olin-related business purposes – never for personal financial gain. Our resources include Olin materials, supplies, equipment, email, and computer systems, if you have access to them.

Keeping Accurate Records

As our business partner, we require that you never make a false statement or falsify the records of the work you do on behalf of Olin. Olin may ask to inspect or review documentation to verify compliance with this Code through internal or external assessment mechanisms.

Data Protection

We have obligations under data privacy laws to protect the personal information of our employees, customers, and vendors. If you have authorized access to this information, we expect you to be responsible for protecting this information, and we require compliance with all relevant data protection laws.

Artificial Intelligence

We recognize that artificial intelligence is increasingly a regular part of doing business. We carefully evaluate the use of artificial intelligence in our business, and we expect you to comply with all regulations and ethical standards in your use of artificial intelligence as well.

LABOR & EMPLOYMENT PRACTICES

Preventing Harassment and Discrimination

Olin is committed to fostering a workplace where every person is treated with dignity, fairness, and respect regardless of race, gender, religion, nationality, age, disability, military status, and/or sexual orientation. We believe that every employee, at every level of the company, has the right to work in an atmosphere that is free of discrimination and harassment. Help us prevent any discriminatory or harassing behavior, including sexual harassment. We will respect your people. Please show the same respect to ours.



Promoting Labor and Human Rights

As part of our commitment to good business practices worldwide, we uphold individual human rights in all of our operations. We expect our business partners to uphold the same standards. Always follow all applicable labor and employment laws and provide employees who work on Olin's behalf with reasonable working hours, fair wages, and other basic human rights. We also have a zero-tolerance policy for the use of child or forced labor or human trafficking practices. We expect that you will never unlawfully employ children, and if minors or children are lawfully employed by you or your suppliers, that they are adequately protected from work that may be physically, psychologically, or developmentally hazardous. We expect you to ensure that employees are not charged recruitment fees or other associated costs and that all of your workers shall be free to leave the work premises when they are off duty. We expect you to allow your employees to maintain their personal documents in their possession and to assure that they understand the terms of employment and working conditions prior to working with you.

SUSTAINABILITY, ENVIRONMENT & COMMUNITY

Stewardship and Sustainability in Everything We Do

We understand that integrating stewardship toward people and the environment in a sustainable manner is paramount in our privilege to operate. Our commitment to sustainability focuses on the opportunities where our impact on the planet, our operations, our people, and communities is most meaningful. As our business partner, we will work together with you to:

- Act with integrity as a responsible corporate citizen, complying with regulations and standards, and partnering to protect the communities where we work, live, and serve.
- Challenge ourselves to find innovative ways to optimize our operations, improve energy efficiency, and reduce waste.
- Empower our employees by treating others with mutual respect and working in a way that protects the health and safety of ourselves and our coworkers.





Protecting the Environment

Safety and environmental protection are top priorities at Olin. We work to protect the health and safety of our employees and everyone in the communities where we operate. Similarly, we expect our business partners to comply with all applicable laws and requirements in a manner that protects the health and safety of everyone in the communities where they operate or dispose of waste materials. This includes laws and manufacturers' instructions as it relates to wastewater, air emissions, and hazardous and non-hazardous waste.

Olin is proud to be a responsible corporate citizen. We follow global initiatives aimed at minimizing any negative impact from the manufacture, distribution, and use of chemicals, while maximizing the beneficial use of our products in society. We expect you to take a similar approach to environmental concerns and to undertake continuous improvement initiatives to minimize environmental and human health impacts of your operations, including taking steps

to protect against soil, water, or air pollution or any other impact that may affect human health, natural ecosystems, or biodiversity.

We monitor our energy, water, and material use and are continuously looking for ways that we can reduce consumption and enhance efficiency. We encourage you to do so as well.

Ensuring Safety

Olin is committed to providing its employees and contractors with a safe work environment in our plants and facilities. We expect our business partners to uphold our commitment to safety by complying with all applicable safety laws and regulations. If you become aware of any unsafe condition, malfunction of monitoring and control equipment, or a threatening situation at any of our facilities, you should immediately contact someone at Olin or make a report through our Olin Help-Line. If such a situation presents immediate danger, please contact local authorities, police, or security agencies, as well as Olin.

QUALITY & PRODUCT EXCELLENCE

Maintaining Quality

The integrity and quality of our products and services are fundamental to our company's reputation and our ultimate success. All of our products and services must meet accurate inspection, testing, and quality criteria in accordance with contract and government requirements. We rely on you, as our business partner, to help us meet these standards of accuracy.

Business Continuity

Olin has plans and processes in place to ensure business continuity. As our business partner, you should also have appropriate business continuity plans in place for your operations that support Olin's business. These plans should be designed and kept current to ensure recovery and restoration of critical functions and minimize disruption of our operations.

Information Security

Olin works to protect our information and company systems from loss, interruption, cybersecurity attacks, and other compromises or legal issues. We maintain reasonable administrative, technical, and physical safeguards to protect our information technology systems so that we can continue to assure the safety and security of our data. We understand the importance of our information technology systems in allowing us to ensure that we are able to deliver our products to our customers and protect our employee, customer, and vendor data. We maintain these cybersecurity and data privacy controls to assure the protection of our systems and data, and we expect you to safeguard your systems and data as well. As our business partner, we expect you to promptly notify us if you experience a cybersecurity event that could impact the security or confidentiality of Olin's systems, data, or operations.



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