



WORKING WITH OLIN

BUSINESS PARTNER CODE OF CONDUCT

A Message from Our Chairman, President, and CEO



Dear Olin Business Partner:

Our company is committed to our Core Values: Act with Integrity; Drive Innovation and Improvement; and Lift Olin People. In fact, it is this commitment that has helped us build long-lasting relationships with our customers and with you, our valued distributors, suppliers, and business partners.

We work hard to deliver great products and services but not at the expense of doing what's right. We expect every Olin employee to operate with the highest standards of integrity. We have the same expectations for our business partners.

It is for this reason that we published this Business Partner Code of Conduct. This Code communicates our Core Values as well as the standards of business conduct we expect when you operate with us or on our behalf. We encourage you to review this Code and share it with your employees who work with our company.

If you have questions about this Code, or if you need guidance on how to meet its standards, we encourage you to talk with the Olin employee with whom you work or reach out to our Olin Help-Line service. We appreciate your questions and concerns because they allow us to improve our processes and become a better company.

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

Sincerely,



Scott Sutton
Chairman, President, and Chief Executive Officer

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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: Act with Integrity; Drive Innovation and Improvement; and Lift Olin People.

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.

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 through the following channels:

Internet: www.OlinHelp.com

Toll-Free Telephone*:

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	800-93-2266**
Italy	800-902432
Japan	0120-944048
Korea	080-908-0978
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

We believe in the excellence of our products, and we know that providing high-quality products is always the best way to win business.

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 which 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, and 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 entertainment that exploits a person's ethnic identity, race, or religion. We ask that you not offer such entertainment on Olin's behalf or to Olin's employees.

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.

Olin will vigorously protect our intellectual property.

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.



Preventing Harassment and Discrimination

Olin is committed to fostering a workplace where every person is treated with dignity, fairness, and respect. 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.

Olin is committed to fostering a workplace where every person is treated with dignity, fairness, and respect.



Stewardship and Sustainability in Everything We Do

We understand that integrating stewardship toward people and then environment in a sustainable manner is paramount in our privilege to operate. Our commitment to sustainability focuses on our four pillars, which are defined by issues material to Olin that are aligned with the UN Sustainable Development Goals: Energy and Climate Mindfulness; Resource Efficiency; Product Sustainability and Commercial Outreach; and Employee and Community Care. This helps us advance 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 Responsible Corporate Citizens, complying with regulations and standards, and partnering to protect the communities where we work, live, and serve.
- Drive Innovation and Improvement by challenging ourselves to find innovative ways to optimize our operations, improve energy efficiency, and reduce waste.
- Lift Olin People 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.

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.

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.





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.

The integrity and quality of our products and services are fundamental to our company's reputation and our ultimate success.

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 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 networks from loss, interruption, virus 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.



INTEGRITY
EVERY DAY. EVERY WAY. EVERY ONE.

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