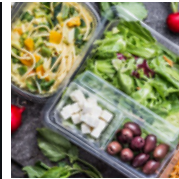




# 2020 ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

GLOBAL REPORTING INITIATIVE (GRI) AND SASB APPENDIX



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# Introduction

As a demonstrable commitment to improving our environmental, social, and governance (ESG) performance and transparency in reporting, Westlake developed this Global Reporting Initiative (GRI) and Sustainability Accounting Standards Board (SASB) Disclosures Appendix (“ESG Appendix”). This Appendix is supplementary to the content featured in Westlake’s 2020 Sustainability Report.

For each material topic, Westlake outlines a management approach according to both the GRI standards and the corresponding topic specific GRI disclosures, except for cyber security which is not covered by the GRI. Many of the GRI disclosures satisfy the requirements of SASB. However, we also provided specific SASB information when necessary.

Westlake’s GRI Appendix is reported in accordance with the GRI standards for the period of January 2020 — December 2020<sup>1</sup> using the GRI 1: Foundation 2021 Standards. We endeavored to incorporate the GRI’s reporting principles into this GRI Appendix. We referenced our disclosures to the SASB standards metrics for the chemical sector. The GRI Content Index includes references to the 2020 Sustainability Report, the 2020 Annual Report (10-K), and the Westlake website.

In addition to the GRI and SASB, we aligned Westlake’s material ESG issues with the UN Sustainable Development Goals and provide references to them in the GRI Content Index.

More information on Westlake’s approach to financial and non-financial value creation can be found in the following reports and resources:

**[2020 Environmental, Social and Governance \(ESG\) Report](#)**  
**[2020 Annual Report \(Form 10-K\)](#)**  
**[ESG on website](#)**

<sup>1</sup>Unless otherwise stated

# Materiality Process and Topics

**GRI 3-1, 3-2, 3-3**

In 2021, we carried out a materiality assessment to identify the ESG issues that are most important to our business and our stakeholders. The materiality process also supports decisions on where to focus internal resources and how to respond to the needs of our stakeholders. The materiality assessment culminated in a matrix of ESG topics, with the position of topics relative to the degree of stakeholder interest and potential business impact (see page 8 of the 2020 ESG Report).

## THE ESG ASPECTS THAT ARE CONSIDERED MATERIAL FOR WESTLAKE IN 2020 INCLUDE:

### PROCESS SAFETY AND EMERGENCY PREPAREDNESS

The safe containment of hazardous materials to avoid explosions, fires, unplanned shutdowns resulting in plant disruption, loss of life, or environmental impacts

### VALUE GENERATION AND DISTRIBUTION

Our ability to deliver tangible and lasting economic benefits to our stakeholders

### HEALTH AND SAFETY

Assurance of a safe and healthy workplace and the promotion of safe working practices, including the protection of workers from COVID-19

### COMPETITIVENESS AND RELIABILITY

Our ability to compete in the marketplace and deliver products to customers in a reliable manner

### ENVIRONMENTAL COMPLIANCE

Compliance with environmental laws and regulations while managing our impact on water, air, and ecosystems in a sustainable manner

### ETHICS AND COMPLIANCE

Maintenance of Westlake's compliance with regulatory requirements, including anti-bribery, anti-corruption, anti-competitive behavior

### AIR QUALITY

Responsible management of emissions to the environment, including particulates, NOx, SOx, etc

### CLIMATE CHANGE AND ENERGY

The use or production of energy in all its forms (as well as associated greenhouse gas emissions) to comply with regulations and increase efficiencies to minimize emissions, plus the impact of climate change on Westlake and other stakeholders

### WASTE AND CIRCULAR ECONOMY

Managing waste-related impacts through reduction of waste and optimized production while gradually integrating renewable feedstocks, recycled content, and sustainable raw materials

### WATER AND EFFLUENTS

Managing our impacts from water withdrawal, consumption, and discharge of effluents

### COMMUNITY ENGAGEMENT AND IMPACT MANAGEMENT

The positive and negative impacts of Westlake, its activities, and business partners on local communities

### DIVERSITY AND INCLUSION

Commitments and practices to uphold and promote diversity and inclusion in the workplace

### CYBER SECURITY

Security of our manufacturing locations, key technology and operating systems, and sensitive and proprietary information

### PRODUCT RESPONSIBILITY

Ensuring our products are safe for our customers, employees, communities, and the environment to maintain trust and meet customer standards and regulatory obligations

Presentation of an issue as non-material on the materiality matrix does not mean it is not important to Westlake or that it is not being managed, but only that it is not of sufficient significance to be addressed in detail in this report for 2020. We anticipate the next materiality assessment will be conducted in an operating year following the completion of companies acquired in 2021-2022. In addition to and in support of our materiality assessments, we continually gather feedback on our ESG performance and reporting from a range of stakeholders and sources throughout the year, including stakeholder engagement, investor meetings, and ESG ratings.

Information on how we manage sustainability and our materiality process, see page 8 of our 2020 ESG Report.

# General Disclosures

## 2021

### GRI 2-1: The Organization and its Reporting Practices

#### 2-1: ORGANIZATIONAL DETAILS

Westlake Chemical Corporation (NYSE: WLK). Unless otherwise noted, the “Company,” “we,” “our,” “us,” and “Westlake” are used in this report to refer to the businesses of Westlake Chemical Corporation and its consolidated subsidiaries.

Westlake is a global, independent chemical company and incorporated under Delaware law. Our headquarters are in Houston, Texas, United States but also have operations in Canada, Germany, France, Italy, Spain, Mexico, Japan, Vietnam, Taiwan and China.

#### 2-2: ENTITIES INCLUDED IN THE ORGANIZATION'S SUSTAINABILITY REPORTING

See GRI 2-1 above and reference Item 8 of our Annual Report for consolidated financial statements.

#### 2-3: REPORTING PERIOD, FREQUENCY AND CONTACT POINT

We provide our ESG report on an annual basis. Data in this report relates to our manufacturing sites, pipelines, and large offices for January 1, 2020-December 31, 2020, unless stated otherwise. The reporting period is aligned with our ESG report that was published on September 24, 2021, and the reporting period for our financial annual report (10-K) published on February 24, 2021.

All questions relating to our sustainability reporting may be directed to [sustainability@westlake.com](mailto:sustainability@westlake.com).

#### 2-4: RESTATEMENTS OF INFORMATION

No restatements of information were made from the previous reporting period.

#### 2-5: EXTERNAL ASSURANCE

Westlake does not currently seek external assurance with regards to its sustainability reporting.

### GRI 2-2: Activities and Workers

#### 2-6: ACTIVITIES, VALUE CHAIN AND OTHER BUSINESS RELATIONSHIPS

We are a vertically integrated global manufacturer and marketer of basic chemicals, vinyls, polymers and building products. We operate in two principal operating segments, Vinyls and Olefins. We are highly integrated along our olefins product chain with significant downstream integration into polyethylene and styrene monomer. We are also a highly integrated global producer of vinyls with substantial downstream integration into polyvinyl chloride (“PVC”) building products.

Our products include some of the most widely used materials in the world, which are fundamental to many diverse consumer and industrial markets, including flexible and rigid packaging, automotive products, coatings, water treatment, refrigerants, residential and commercial construction as well as other durable and non-durable goods.

Information on our business can be found on pages 6 and 15 of the 2020 ESG Report and Item 1 in our Annual Report

#### 2-7: EMPLOYEES

In 2020, we employed 9,220 global employees, of which 15.9% (1,463) were female and 84.1% (7,757) were male. In addition to our own employees, we use the services of contractors to assist with non-core business functions.

#### EMPLOYEES BY REGION & GENDER, 2020 (HEAD COUNT/FULLTIME EMPLOYEE)

Region	Permanent Employees	Female	Male
North America	6932	1140	5792
Europe	1564	172	1392
Asia	724	141	573
<b>Total</b>	<b>9220</b>	<b>1453</b>	<b>7757</b>

Information on temporary employees is currently available for North America only. In 2020, Westlake had 43 temporary employees in North America, all of which were male.

#### 2-8: WORKERS WHO ARE NOT EMPLOYEES

At Westlake, workers who are not employees represent an insignificant portion of our workforce. Typically, we hire contractors on a temporary project basis to provide services or maintenance. Where possible we source contractors from the local population, and they must comply with our ESG standards which we communicate via contractor procedure documents.



## GRI 2-3: Governance

### 2-9: GOVERNANCE STRUCTURE AND COMPOSITION

At Westlake, our Principles of Corporate Governance outline our management structure and organization to ensure long-term value creation. Our Board of Directors (the Board) regularly monitors policies and decisions made at the Board, Committee, and management levels. Our Governance documents, including the Code of Conduct (the Code), can be found on our website at <https://www.westlake.com/investor-relations/corporate-governance>.

Westlake has four Board-level committees:

- Audit
- Nominating & Governance
- Compensation
- Corporate Risk & Sustainability

Westlake's Board of Directors had previously delegated its oversight responsibilities for sustainability to the Board's Corporate Risk Committee, reflecting the perspective that sustainability was among the many corporate risks facing the company. More recently, in February 2021, the Board amended the charter of the Board's Corporate Risk Committee, changing its name to the Corporate Risk and Sustainability Committee. The board did this to explicitly emphasize that sustainability is in the committee's scope of responsibilities.

The Corporate Risk and Sustainability Committee meets at least four times per year to discuss a broad range of risks, opportunities, and issues — everything from the environmental, health and safety, social responsibilities to cybersecurity risks. Furthermore, all Directors sit on all Board committees, except for Audit, in our effort to ensure that every Board member is actively engaged and contributes to key decision making from Finance to Sustainability as part of our governance structure.

Information on our governance structure see page 6 of our ESG Report, our [Principles of Corporate Governance](#) and Governance [webpage](#) and our proxy statement.

### 2-10: NOMINATION AND SELECTION OF THE HIGHEST GOVERNANCE BODY

We provide information on our Board nomination process and 2021 Nominees to the Board on pages 9-11 of our proxy statement.

### 2-11: CHAIR OF THE HIGHEST GOVERNANCE BODY

Information on our Board leadership structure on pages 5 and 7 of our proxy statement.

### 2-12: ROLE OF THE HIGHEST GOVERNANCE BODY IN OVERSEEING THE MANAGEMENT OF IMPACTS

Our Board oversees our overarching business strategy and its management of material topics and impacts, which is reviewed on an annual basis. The Board is updated regularly about Westlake's progress relating to sustainable development. Information on our risk management process with regards to sustainability on page 6 of the ESG Report, in our proxy statement and in our Principles of Corporate Governance and on our Governance [webpage](#).

### 2-13: DELEGATION OF RESPONSIBILITY FOR THE MANAGING IMPACTS

The Vice President — Sustainability and the Director of Corporate Health, Safety and the Environment attend the Corporate Risk and Sustainability Committee. The Vice-President — Sustainability meets regularly with his direct reports to discuss key ESG topics, initiatives, and strategy. Furthermore, the Vice President — Sustainability is supported by a global group of employees who are responsible for the managing the impact the business has on ESG topics. These include but are not limited to: Vice President Human Resources; Director, Corporate Environment and Sustainability; Director, Health Safety and Environment; Manager, Continuous Improvement; Corporate Manager of Process Safety; Manager, Product Stewardship and Director, Corporate Communications and Government Relations. In this way, the responsibility for sustainability continues to be embedded throughout our organization.

Information on managing our impacts can be found on page 8 of the 2020 ESG Report.

### 2-14: ROLE OF THE HIGHEST GOVERNANCE BODY IN SUSTAINABILITY REPORTING

The Corporate Risk and Sustainability Committee of the Board is the highest governance body that is responsible for reviewing and approving reported information, including the organization's material topics.

Information on our sustainability reporting can be found on page 8 of the ESG Report and on our Governance Webpage.

### 2-15: CONFLICTS OF INTEREST

See our Principles of Corporate Governance, Code of Ethics and the Code which outlines our expectations for the Board regarding conflicts of interest as does page 24 of our proxy statement.

### 2-16: COMMUNICATION OF CRITICAL CONCERNS

Critical concerns are reviewed by the Board of Directors and its Corporate Risk and Sustainability Committee on at least a quarterly basis. Senior executives and employees are responsible for reviewing applicable metrics and reports and for discussing critical sustainability concerns to be addressed by the company. Employees may report concerns via the company's confidential grievance system EthicsPoint and materials relating to our sustainability governance may be found on our intranet.

### 2-17: COLLECTIVE KNOWLEDGE OF THE HIGHEST GOVERNANCE BODY

Our Vice President — Sustainability and the Director of Corporate Health, Safety and the Environment attend the Corporate Risk and Sustainability Committee to provide the Board and committee with strategic insight into ESG topics. These insights are determined via engagement with colleagues addressing our broad range of ESG risks, opportunities, and issues — from environmental, health and safety responsibilities to cybersecurity risks. Furthermore, the Vice President — Sustainability and his team engage with third party sustainability specialists, ESG rating agencies, attend ESG-related conferences and other external stakeholders to advance the collective knowledge on ESG topics. This knowledge is shared, where relevant with the Corporate Risk and Sustainability Committee.

Information on our Board's expertise can be found on pages 10-12 of our proxy statement.

### 2-18: EVALUATION OF THE PERFORMANCE OF THE HIGHEST GOVERNANCE BODY

Information on our Board's process for self-assessment of its performance can be found on page 6 of our proxy statement and in our Principles for Corporate Governance.

### 2-19: REMUNERATION POLICIES; 2-20: PROCESS TO DETERMINE REMUNERATION

Information on our remuneration policies and processes for director and executive compensation can be found in the "Compensation Discussion and Analysis" section of our proxy statement, beginning on page 14.

### 2-21: ANNUAL TOTAL COMPENSATION RATIO

Information on our annual total compensation ratio can be found on page 25 of our proxy statement.

## GRI 2-4: Strategy, Policies and Practices

### 2-22: STATEMENT ON SUSTAINABLE DEVELOPMENT STRATEGY

Our President and CEO shares a statement on our sustainability strategy on page 3 of our ESG Report.

### 2-23: POLICY COMMITMENTS

Westlake's commitment to being a responsible business is set out in multiple publicly available documents including our Code of Conduct, Supplier Code of Conduct (Suppliers' Code), Conflict Minerals statement, California Supply Chain Transparency Act which includes provisions on human rights. These policies set standards and commitments for our customers, employees, and local communities.

Furthermore, Westlake has committed to promoting the United Nations' Sustainable Development Goals (SDGs), which provide us with key business opportunities while allowing us to advance to a more sustainable future. We also promote Sustainability Accounting Standards Board and are active in several interest and trade associations, sectoral associations, and scientific and research organizations.

Additional information on our policy commitments throughout our ESG Report and on our ESG webpage.

### 2-24: EMBEDDING POLICY COMMITMENTS

Our Code and Suppliers' Code ensures our operations, employees and senior leadership adhere to our core values and our commitments to responsible business conduct. Operating with integrity and in an ethical manner is central to our business and is interwoven into our risk management strategies and processes as set by our Board of Directors and its committees on an annual basis.

From the feedstocks we use and products we develop to how we engage with local communities, our commitment to the SDGs and responsible business are managed at the site level up through to our Board of Directors. We reference how we embed our policy commitments into our business operations and strategies throughout this appendix.

### 2-25: PROCESS TO REMEDIATE NEGATIVE IMPACTS

Part of our commitment to responsible business includes remediation of negative impacts that we may contribute to in our operations and business relationships. All our business leaders are responsible for managing sustainability-related efforts through their teams and collaborative efforts. Continuous improvement is one of our core values and has been translated into several actions including our materiality assessment, our community engagement and diversity and inclusion efforts, our memberships and industry association participation, among others. We also provide our customers, employees and suppliers with a confidential grievance mechanism known as EthicsPoint. More information on our remediation process may be found throughout our ESG Report, Annual Report and throughout this Appendix.

### 2-26: MECHANISMS FOR SEEKING ADVICE AND RAISING CONCERNS

All employees, including our eight Executive Officers and eleven members on the Board, are trained on the Code including anti-corruption and anti-bribery. Employees with greater exposure to corrupt or anti-trust activity (such as business development, procurement and permitting) are required to undertake additional targeted training. Each Westlake employee must complete a biannual review and certification to the Code. Ethics-related e-learning materials are accessible to employees via our Intranet.

A global rollout of the Corporate Code of Conduct is planned for newly acquired subsidiaries in 2022. There will be a training module available in ten languages, as well as documented acknowledgment by each employee.

Our legal team assesses all business units for risk of non-compliance with the Code. We periodically conduct audits to ensure compliance with related anti-corruption and anti-bribery laws. Employees and contractors who believe that anyone working for or on behalf of Westlake has violated the Code are encouraged to report their concerns to their line managers, human resources, or the office of General Counsel. They can do so without fear of recrimination and on a confidential basis.

All such reports are properly investigated, and the results are reported back to the Audit and Risk Committee. Alternatively, allegations of malpractice can be logged via Westlake's confidential, 24-hour ethics reporting system, EthicsPoint. It is operated by a third-party company specializing in workplace incident reporting for multi-national companies.

More information on how voicing concerns may be found throughout this Appendix.

### 2-27: COMPLIANCE WITH LAWS AND REGULATIONS

We strive to minimize our impact on the environment, however, incidents can occur. We manage our environmental obligations and after each incident we review and develop action plans to prevent future incidents. Information regarding fines has been omitted for confidentiality constraints.

### 2-29: APPROACH TO STAKEHOLDER ENGAGEMENT

We maintain ongoing dialogue with a wide range of stakeholders and view this engagement as fundamental to our continuing business success. The table below features some of the stakeholders who our operations impact (both positive and negative) and those who influence our activities, including:

Stakeholder group	Engagement mechanism
Investors/shareholders	Annual reporting, website, direct engagement and stakeholder engagement sessions
Customers	Direct engagement, vendor processes and contractual agreements
Employees	Ongoing workplace engagement, direct dialogue, engagement surveys, performance reviews
Labor unions	Regular scheduled meetings and collective bargaining agreements
Suppliers	Direct engagement through procurement process
Local communities	Direct engagement (via business unit managers) and development-focused community investment programs
Industry and trade organizations	Direct and indirect engagement
Non-governmental organizations	Direct engagement (via business unit managers)
Regulators	Direct dialogue, reporting
ESG reporting agencies	Direct dialogue and periodic updates

It is with these stakeholders and their interests in mind that we prioritized our material topics for 2020.

We engage with these stakeholders on an ongoing basis at various levels including the corporate level (i.e., for strategic issues) and at the site level (i.e., for both strategic and operational issues).

We've provided further detail on our engagement with these stakeholders in our 2020 ESG Report and this 2020 ESG Appendix.

### 2-30: COLLECTIVE BARGAINING

Our employees are distributed across 16 countries. Approximately 38% of our employees are represented by labor unions, and all these union employees are working under collective bargaining agreements that expire at various times through 2024. We have multiple collective bargaining agreements in Europe, North America and Asia, covering different groups of our workforce. There were no strikes, lockouts or work stoppages in 2020, and we believe that our relationship with our employees and unions is open and positive.

### 2-28: MEMBERSHIP ASSOCIATIONS

Information on our membership associations can be found on page 17 of our ESG Report.

# Disclosures for Process Safety and Emergency Response, and Health and Safety

## Management Approach:

Given the potential hazards associated with the manufacturing of petrochemicals, polymers, and building products, the application of rigorous health and safety practices is essential in all that we do. This not only helps protect our employees, contractors, communities, and the environment, but also enables us to maintain operational continuity, regulatory compliance, and our corporate reputation. Key issues in relation to health and safety include:

- Occupational health and safety
- Process safety
- Emergency preparedness

## Managing and Monitoring Health, Safety, and Security

Our Health, Safety, and Environment (HSE) policy and [Our Drive to Zero](#) principle are designed to address the most common causes of serious incidents at our manufacturing locations. They include commitments to:

- Continually improve our HSE performance
- Assess and manage risks
- Maintain clean, safe, and healthy workplaces
- Plan and prepare for potential emergencies

Through the implementation of our HSE Management System we aim to minimize the risk and reduce the potential severity of process safety events and occupational health and safety incidents. The system is externally certified to the BS OHSAS 18001 Health and Safety Management System standard<sup>2</sup> for European operations. [Vinnolit](#), our subsidiary in Germany, is externally certified to ISO 45001 Occupational Health and Safety Management System. Those operations that are not currently certified to the OHSAS 18001 standard operate in line with that standard as we strive to drive a consistent HSE Management System approach and culture across all our sites.

We believe that major accidents should be avoided where possible and the impacts of unavoidable and unanticipated accidents can be mitigated. We seek to ensure that our employees, contractors, communities, and the environment

receive a high level of protection. To support this, we implement data-driven, risk-based HSE Management System audit programs across our sites and corporate office, as well as focused reviews against key HSE standards covering process safety and occupational health and safety. We frequently review our operations to assess the risk of major accidents and to implement controls designed to prevent their occurrence. Furthermore, we employed DuPont Sustainable Solutions (DSS) to conduct Safety Culture surveys and to recommend improvements.

HSE performance is monitored, measured, and reported on an ongoing basis to the Executive Committee and to the Board. The Board of Directors meets at least four times a year to discuss risks and opportunities associated with health and safety. Westlake's goal is to have the majority of US-based chemical sites achieve Star status under the Occupational Health and Safety Administration's (OSHA) Voluntary Protection Program (VPP). VPP allows each site's management team and workforce to collaborate with OSHA to promote effective worksite-based health and safety. All Westlake employees are accountable for their own health and safety performance and that of their team. Contracted companies must comply with relevant OHS standards as a minimum and we provide contractors with all applicable procedure documents to communicate these standards.

## Process Safety and Emergency Preparedness

Our HSE management system defines Westlake's minimum requirements for process safety and emergency preparedness in all operations. The system also sets out the responsibilities, verification, and validation required to provide assurance that minimum requirements have been met. We continuously track process safety key performance indicators (KPI). We assess process safety performance each month by identifying, assessing and managing associated risks, in order to confirm each location is safe to operate. These assessments are informed by a multitude of best practices sources including but not limited to, OSHA Process Safety Standard, American National Standards Institute, American Society of Mechanical Engineers American Petroleum Standard, and the US EPA Risk Management Plan.

Westlake's chemical sites have emergency response teams and plans in place, which engages a broad range of stakeholders including certified safety personnel to act as an incident command team, local emergency services, and state and national security departments. We regularly review our response plans and routinely undertake drills and exercises to test response arrangements. This includes the testing of equipment and lines of communication as well as running training exercises within a controlled environment to ensure that all relevant staff understand their roles in an emergency. Major drills are conducted at our chemical site operations and, on a lesser scale, across our other sites and office locations and are based on hypothetical major accident scenarios such as chemical releases, fires, and explosions.

<sup>2</sup>As of March 31, 2021, BS OHSAS 18001 has been officially replaced by ISO 45001. This replacement will be reflected in the next iteration of our report.



Our facilities in Germany comply with Responsible Care, a global voluntary initiative of chemical companies working toward continuous improvements in environmental protection and health and safety. As a part of this commitment, our German-based operations implement section 3.7 of the Responsible Care Management System and the Responsible Care Process Safety Code, which stipulate:

- Consideration of communications and community recovery needs
- Participation in the development, implementation, and maintenance of community emergency preparedness plans
- Creation of an appropriate process for responding to raw material, product, process, waste material, and transportation incidents

## GRI 403: Occupational Health and Safety

### 403-1: OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEM

Westlake's occupational health and safety management system includes several policies and guidelines to ensure high standards of worker health and safety. All Westlake plant sites are covered, as a minimum, by their national, state or province and local government occupational health and safety regulations. This includes but is not limited to corporate and site-specific management systems required by federal and local regulations such as OSHA 29 CFR 1910 (promulgated under the Occupational Safety and Health Act), European directives on safety and health at work, and the Taiwan Occupational Safety and Health Act.

Our corporate HSE policies apply standards using Recognized and Generally Accepted Good Engineering Practices (RAGAGEP). These apply to specific activities (for example, mechanical integrity, facility siting, etc.) conducted by Westlake and its operating chemical facilities. Site-specific policies set out the necessary requirements to meet or exceed compliance with corporate policies and RAGAGEP. Contracted employees may utilize their parent company's health and safety procedures which must meet Westlake's policies as a minimum. These policies are communicated in our terms and conditions and our contractor procedure documents when applicable. Westlake has a dedicated team at the corporate level that is responsible for the HSE management system with HSE personnel responsible for implementation at the site level when applicable.

Find out more about our process safety efforts during 2020 on page 18 of our ESG Report.

Details of our external certifications are available on our website:

- <https://www.westlake.com/core-value-quality-continuous-improvement>
- [https://www.vinnolit.com/wp-content/uploads/2021/04/ISO-45001\\_en\\_2021.pdf](https://www.vinnolit.com/wp-content/uploads/2021/04/ISO-45001_en_2021.pdf)

### 403-2: HAZARD IDENTIFICATION, RISK ASSESSMENT, AND INCIDENT INVESTIGATION

Our HSE Management System defines Westlake's objectives and minimum requirements for process safety and emergency response in all operations, as well as the responsibilities, verification, and validation required to provide assurance that these have been met. We employ a hierarchy of controls to assess risks on a routine and non-routine basis, including Hazard Assessment and Operability Analysis (HAZOP)—a structured and systematic technique for system examination and risk management. Other methods utilized in the identification and elimination of hazards include Failure Modes and Effects Analysis (FMEA), Fault Tree Analysis (FTA), What-If/Checklist techniques, and a global employee survey. We develop action plans from process hazards analysis, which utilize risk-based hierarchy to eliminate and mitigate work-related hazards.

The hazards analysis reports and audits are reviewed by the site management team, which in turn develops the action plan. The composition of the team is dependent upon the technique employed, but in all cases will comprise a cross-functional group with a minimum of three members. The team must have expertise in engineering and process operations, with a minimum of at least one member being:

- Experienced and knowledgeable in the process being evaluated
- Competent in the methodology selected for the hazard assessment
- An operator from the unit being reviewed

Facilitators are required to have completed third-party training on facilitating Process Hazard Analysis (PHA) and to hold supporting documentation. Quality assurance is provided by quarterly self-audits and corporate audits every three years. Hazard analysis is undertaken every five years at a minimum (where required by regulation) or in response to a significant change that necessitates a detailed hazard review. We have change management systems in place to aid in hazard identification and the evaluation of proposed modifications to processes, procedures and, where applicable, personnel changes. Other triggers for a review include new projects or processes, incident investigations, or regulatory audits.

Our business units and operational sites have integrated emergency response plans, which document the roles and responsibilities of employees and contractors in the unlikely event of an emergency. Our Crisis Management Team, located at our corporate office in Houston, Texas, is responsible for managing the Company's reputation and protecting its license to operate in the event of a major event.

Change management encourages continuous improvement, with ongoing, thorough hazard assessment and risk evaluation. The results of risk assessments are evaluated based on safety and environmental and asset impact using a structured matrix. Our policy requires risk to be reduced to a tolerable level within a specific time, based on identified risk.

We encourage employees to speak up if they have any workplace concerns. Anyone can raise a concern without fear of retaliation through their manager, supervisor, or the human resources team. Employees may raise a concern without fear of retaliation through an independent whistle-blower telephone helpline and website ([EthicsPoint](#)), which is available 24 hours a day in ten languages in every country in which we operate. It is managed by a third-party company specializing in workplace incident reporting for multinational companies.

Our corporate HSE policy instructs each site to develop investigation procedures and refers to OSHA's guidance document "Incident Investigation: A Guide for Employers" as a useful resource. Furthermore, our HSE policy identifies acceptable formal root cause analysis methodologies to ensure identification of corrective actions to prevent future occurrences.

Common workplace safety hazards in the chemical industry include:

- Potential exposure to fluids and gases at high temperatures and pressures
- Contact with harmful substances
- Working on machinery with rotating and other moving parts

Common workplace health hazards in the chemical industry are classified as:

- Physical (e.g., radiation, constant loud noise, spills on floors and tripping hazards, unguarded machinery)
- Ergonomic (e.g., improperly adjusted workstations and chairs, awkward movements)
- Chemical (e.g., exposure to solvents, corrosive or flammable materials, and pesticides)

Westlake has well-established emergency plans to manage specific locational risks such as our Hurricane Preparedness Plan, which was activated in 2020 when we shut down certain units as a precautionary measure in our Lake Charles, Louisiana in response to Hurricanes Laura and Delta.

### 403-3: OCCUPATIONAL HEALTH SERVICES

Westlake employs trained professionals in Health, Safety and Industrial Hygiene, who provide direction and development of occupational health procedures. Our work environments are audited regularly in conjunction with cross functional teams to provide expert advice on factors that influence employee and contractor's health in the workplace. We have trained first responders and, in some locations, medical professionals who ensure first aid and emergency treatment is available should the need arise. Personnel who manage employees' personal health-related information undertake additional training in sensitive data handling.

We monitor OHS factors in the work environment, including sanitary installations, canteens, and housing provided to workers, or in work practices, which might affect workers' health. Our trained Health, Safety and Industrial Hygiene professionals provide advice on:

- Occupational health, safety, and hygiene
- Advice on ergonomics
- Individual and collective protective equipment
- Promotion of adaptation to the worker's needs
- Organization of first aid and emergency treatment

#### **403-4: WORKER PARTICIPATION, CONSULTATION, AND COMMUNICATION ON OCCUPATIONAL HEALTH AND SAFETY**

All Westlake employees are accountable for their own HSES performance and that of their team (*"I own your safety and mine"*). We encourage worker participation in the formal site management teams responsible for reviewing hazard and audit reports, and for development of action plans. A global safety perception survey was also completed to identify opportunities and develop actions to address the improvement areas. As part of the induction process, all employees receive HSES awareness training including their role in an emergency.

As part of our employee engagement process:

- All employees enter into individual performance contracts that include a behavioral measure concerning health and safety
- We hold regular safety meetings at our operated locations and in our business unit offices where health and safety issues are discussed by both management and employees
- Employees receive regular, direct communications on HSES issues from senior managers and supervisors — including through the issuing of HSES Alerts and the sharing of best practice
- HSE information and standards are included in contractor procedure documents

#### **403-5: WORKER TRAINING ON OCCUPATIONAL HEALTH AND SAFETY**

All employees are trained in their role in an emergency — from participating in headcounts, mustering, communication lines, or being a member of the incident command structure.

#### **403-6: PROMOTION OF WORKER HEALTH**

Westlake Chemical Corporation offers a choice of medical insurance benefit plans to ensure access to non-occupational medical and healthcare services including preferred provider organization (PPO) and Consumer Health plans including health savings accounts. Westlake offers wellness and fitness resources to help promote the health and well-being of employees and their family. These non-occupational medical and healthcare services or wellness benefits would be offered directly by the contract employer, if available.

More information can be found in our 2020 Benefits Guide.

#### **403-7: PREVENTION AND MITIGATION OF OCCUPATIONAL HEALTH AND SAFETY IMPACTS DIRECTLY LINKED BY BUSINESS RELATIONSHIPS**

Westlake's product stewardship requirements are designed to prevent and mitigate health and safety impacts from operations, products or services linked with business relationships, and provide for hazard assessment and identification at every stage. These requirements encompass the full life cycle of products, from design to disposal, and provide for review and approval processes when product specifications, regulatory status or quality have changed.

Communication of current and updated HSE information to stakeholders — including distributors and customers, through documentation or product labels — is also a key step in our process. We include recommended mitigation measures on our labels and product information documents for our products listing emergency assistance information, first aid procedures and recommendations for spill containment and clean-up. We advise customers on safe handling, use and disposal of our products, including alerts if evidence becomes available that demonstrates a previously unknown adverse health, safety and/or environmental effect associated with the use of a Westlake product. We also require suppliers to provide appropriate HSE information and guidance on their products.

#### **403-8: WORKERS COVERED BY AN OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEM**

All employees and contractors whose work and/or workplace is controlled by Westlake are required to comply with all health and safety management system requirements. For 2020, this covered 9,220 employees. Any contractor would be covered by our occupational health and safety management system as part of our contracting process. Sites are audited on a regular basis for compliance with health and safety regulations as well as policies. These audits are conducted by internal and third-party auditors. Lessons learned and best practices are shared across the wider business. Onsite contractors, including logistics companies that load and transport our products, are expected to comply with our HSE policies and support our Drive to Zero principle.

## 403-9: Work-related Injuries

All Employees**		
Metric	Number	Rate*
Fatalities as a result of a work-related injury	1	0.01
High-consequence work-related injuries (excluding fatalities)	N/A	N/A
Recordable work-related injuries	67	0.70
Main types of work-related injury	The most common recordable injury involved hands and accounted for 22% of the total. Ankle and chest injuries accounted for the next highest recordable injury percentage (9% each). Approximately 67% of the recordable injuries involved mechanisms that include "struck by", "strike against", "caught in, under, or between", and "cut, puncture, or scrape".	
Hours worked	19,158,321	–

\*Rates based on 200,000 hours

\*\*Data in this table excludes contractors, see below for contractor-related data

Contractor Employees		
Metric	Number	Rate*
Fatalities as a result of a work-related injury	Information on fatalities is available for the US-based chemical plant sites only. There were zero contractor fatalities, and so the fatality rate was zero.	
High-consequence work-related injuries (excluding fatalities)	N/A	N/A
Recordable work-related injuries	10 (US only)	0.32 (US only)
Main types of work-related injury	N/A	N/A
Hours worked	6,168,660 (US-only)	N/A

\*Rates based on 200,000 hours

Hazards in the workplace are identified using proactive tools such as process hazards analysis, prestart-up safety review and job safety analysis. Additionally, post-event hazard analysis is conducted using root cause analysis to identify actions to prevent reoccurrence. We evaluate root causes of high-consequence events and near miss events in our systems and contributing factors. Hazards were found which included unrestrained mechanical energy, asphyxiation gases and UV light reactive chemicals.

A global safety perception survey was also completed to identify opportunities and develop actions to address the improvement areas. Life critical safety rules were developed and adopted across the organization.

We develop action plans from process hazards analysis which utilize risk-based hierarchy to eliminate/mitigate work-related hazards. Data is compiled based on HSE policy reporting requirements and collected within our third-party risk and compliance management platform, where available. Additional information is collected by corporate HSE and documented in the OSHA Incident Log. Furthermore, annual occupational illness and injury data is collected from North America chemicals manufacturing sites for reporting to the AFPM (American Fuel & Petrochemical Manufacturers) trade association. We identify close calls and hazards across the company based on the records within this platform and take further action depending on the severity of the risk with a root cause analysis.

## 403-10: Work-related Ill Health

Metric	All Employees		Contractor employees	
	Number	Rate	Number	Rate
Fatalities as a result of work-related ill health	0	0	This information is not currently available.	
Recordable work-related ill health	0	0	This information is not currently available.	
Main types of work-related ill health	There were no cases of work-related ill health reported.		This information is not currently available.	

Westlake's HSE policy sets requirements for management of chemicals, exposure monitoring, medical surveillance, and other control activities. No cases of ill health have been reported during the reporting period. Sites are currently managing their potential risk for ill health from possible chemical exposure. Data is compiled based on policy reporting requirements and collected within a 3rd party HSE and compliance platform, where available. Additional information is collected by corporate HSE and documented in the OSHA Incident Log.

# Disclosures for the Environment

## Management Approach for Environment:

Vigilant stewardship of the environment and sustainability are of utmost importance and at the forefront of everything we do.

Westlake is an international manufacturer and supplier of petrochemicals, polymers and building products that enhance the daily lives of people around the world. We incorporate environmental considerations into our decision-making processes, and we implement practices and technologies to help mitigate the negative impacts on air quality and water quality on the local environment and can contribute to climate change. Any failure to avoid and/or mitigate these impacts could have material reputational and regulatory consequences for our business as well as impact our social license to operate.

Our most significant environmental material topics include:

### ENVIRONMENTAL COMPLIANCE

Compliance with environmental laws and regulations while managing our impact on water, air and ecosystems in a sustainable manner.

### AIR QUALITY

Compliance with non-GHG emissions standards and managing emissions from our operations.

### CLIMATE CHANGE AND ENERGY

Compliance with emissions regulations and improving cost-efficiency through increasingly efficient energy management to minimize emissions.

### WASTE AND CIRCULAR ECONOMY

Compliance with this highly regulated topic for the chemical industry and managing waste-related impacts by continually seeking to reduce waste and optimize production. Gradually integrating non-fossil fuel-based streams as an increasingly important source of alternative feedstock and committing to the highest standards for selecting third party waste vendors.

### WATER AND EFFLUENTS

Compliance with environmental laws and the efficient use of water is a key component of our chemical production processes.

We manage our environmental performance across our facilities through our Health, Safety and Environment (HSE) Management System. Westlake is certified to the ISO 14001 environmental management systems standard across our global compounding facilities. We certified our chemical operations in Aberdeen, Mississippi and our Headquarters in Houston, Texas in 2021.

We will be evaluating additional operations to certify in 2022.

Our HSE Management System supports our compliance with environmental regulations across our locations in North America, Asia and Europe. Westlake considers environmental impact assessments (EIA) as a part of the planning stage for any new operations or expansions of existing locations. Considerations include emissions, waste, and historical contaminations that are being addressed. We gauge the significance of each impact and assess how we can best manage those impacts. In this regard, we decide on the implementation of potential impact controls based on efficacy, practicality and cost. In 2020, we made capital expenditures of \$31 million related to environmental compliance.

Our sites record key environmental metrics on an ongoing basis. These metrics are analyzed monthly and relevant performance indicators are reported to the Board. The corporate HSE team conducts audits of our manufacturing facilities every three years to assess the current level of performance, identify opportunities for continuous improvement, verify compliance, and quality of activity and reduce risk. The scope of the HSE audit includes but is not limited to environmental compliance and waste disposal sites.

We incorporate environmental criteria into the Westlake Continuous Improvement Process (WCI). This process seeks to improve efficiencies in process engineering and in doing so improve our environmental performance. The process reviews projects conducted at site-level to measure the success of KPIs to identify best practice that can be implemented across the business.

We inform our employees of our environmental initiatives and programs via our Intranet and internal sustainability newsletter.

More information on our ISO certifications can be found here:

- <https://www.westlake.com/report-policy-and-certification-library>
- <https://www.westlake.com/core-value-quality-continuous-improvement>

More information on our environmental policy:

- <https://www.westlake.com/sites/default/files/Color%20600.pdf>



## GRI 301: Materials

### Management Approach:

At Westlake, we are proactively engaged in the transition towards a circular economy. Being resource-efficient benefits both our competitiveness and the environment and makes us more resilient to emerging regulations and changing consumer preferences.

Optimizing our approach to materials-use is a top-down priority implemented and evaluated at the site level. Our circular economy efforts range from utilizing reused, recycled or renewable feedstocks and resources when applicable to process redesign. Two main areas of focus are feed stream utilization and plastic recycling and reuse as they create economic and environmental value for us and our customers.

We also directly engage with our customers on how best to recirculate and recycle materials, improving the sustainability of the wider value chain. Beyond direct engagement, we are involved in or partnered with a variety of organizations including:

- Materials Recovery for the Future (MRFF)
- EU Circular Flooring Project
- The Vinyl Institute
- Flexible Packing Association
- Alliance to End Plastic Wastes

Information on how we manage our materials can be found on page 26 of our 2020 ESG Report.

### 301-1: MATERIALS USED BY WEIGHT OR VOLUME

We operate in two principal operating segments, vinyls and olefins. We are highly integrated along our olefins product chain with significant downstream integration into polyethylene and styrene monomer. We are also a highly integrated global producer of vinyls with substantial downstream integration into polyvinyl chloride ("PVC") building products.

Through Westlake Chemical OpCo<sup>3</sup> facilities in Lake Charles and Calvert City, we produce most of the ethylene required to produce our polyethylene and styrene, although we do acquire ethylene from third parties to support a portion of our vinyls segment. Ethylene can be produced from either petroleum liquid feedstocks, such as naphtha, condensates and gas oils, or from natural gas liquid feedstocks, such as ethane, propane and butane. Both of OpCo's Lake Charles ethylene plants use ethane as the primary feedstock. Other purchased materials include butene and hexene, which are used to manufacture polyethylene, and benzene for the manufacturing of styrene.

Total weight of production in 2020 was 19.45MM tons.

### 301-2: RECYCLED INPUT MATERIALS USED

Westlake is involved in the production of compounds made from feedstocks derived from renewable materials like bio-based waste and residue oils, such as our Aspire Vinyl compounds. The Aspire Vinyl compounds are phthalate-free, bio-based compounds that contain more than 35% renewable content and were specifically designed to help customers meet their sustainability needs.

In promotion of the circular economy of materials, we also utilize post-industrial recycled raw materials. We are developing bio-based solutions for building materials via the identification of a bio-based plasticized PVC compound and are advancing solutions for the use of post-consumer resin through our one-pellet solution. Our pipe and fittings business segment products recycle post-industrial scrap for their finished products, accounting for 9.4% of total pipe production in 2020 and diverting more than 50 million pounds per year from landfills.

### 301-3: RECLAIMED PRODUCTS AND THEIR PACKAGING MATERIALS

Our feedstocks and end-products are primarily provided via pipeline, rail and barge where packaging is not utilized. For most packaged goods, Westlake delivers commodity chemicals in drums, boxes, totes and sacks.

<sup>3</sup>OpCo is a partnership between Westlake Chemical Corporation and Westlake Chemical Partners.

## GRI 302: Energy

### Management Approach:

Our core operations require significant energy use. Therefore, we seek to continually reduce the carbon intensity of our operations by focusing on the optimal feedstocks for energy as well as our ethane processing and downstream chemical engineering processes. We continuously strive to improve efficiencies and reduce energy use at our facilities and along our value chains. Doing so allows us to improve cost-efficiency while at the same time reducing our greenhouse gas emissions.

Through efforts like energy optimization or the use of lower carbon-intensive fuels, we continue to improve our energy use and, in turn, the overall sustainability of our operations and products. As part of our assessments, we track and monitor energy use at each site which is further reviewed at both the corporate and board levels. Our Vinnolit operations have received ISO 50001 — Energy Management System certifications as part of Westlake’s overarching efforts to reduce its carbon footprint.

Our plants’ primary energy sources are steam, heat and electricity which may be internally produced via our cogeneration facilities or externally purchased. Coal is of limited use in our facilities and, when applicable, we draw on alternative energy sources for our operations.

Climate change is relevant to Westlake’s operations, our customers and products. We recognize that climate change has the potential to pose physical risks to our operations. Such risks might include heightened storm risks and long-term sea level rise. Climate change also poses a variety of corporate-level transition risks to the Company including evolving fiscal and legislative responses to climate change in our countries of operation. Westlake will continue to closely monitor the developing policy environment at an international and national level and will adapt accordingly.

## Topic Specific Disclosures:

### 302-1: ENERGY CONSUMPTION WITHIN THE ORGANIZATION

Energy Use (millions of gigajoules)	
Total energy consumption within the organization	198
Percentage of total energy consumption within the organization from renewable sources	16%
Total fuel consumption within the organization	104
Total energy sold	2.12

Energy Intensity (million BTU per ton of production)	
Energy intensity	9.66

We used the following methodologies to calculate our GHG emissions: EPA GHG Mandatory Reporting Rule (40 CFR Part 98) and provider-specific emission factors for utility purchases.

Westlake does not currently disclose the full breakdown of its fuel and energy consumption per GRI standards. Disclosure of this indicator is under consideration.

### 302-3: ENERGY INTENSITY

In 2020, Westlake’s energy intensity ratio was 9.66, with total energy usage within the organization being 198,240,008 gigajoules.

Our energy intensity ratio increased 8% in 2020 due to the first-time inclusion of our building products data in our total energy consumption calculations. This addition accounted for approximately 95% of the total increase over our 2019 numbers. Other factors contributing to the 2020 increase include recovery response efforts related to facility disruptions in the Lake Charles region of Louisiana following significant natural hazard events. Energy intensity trends can be found on the data sheet on page 42 of the 2020 ESG Report.

### 302-4: REDUCTION OF ENERGY CONSUMPTION

In 2020, we implemented several efficiency measures which contributed to the reduction of 1,063,094 MMBTUS of energy. These measures included maximizing heat recovery projects, optimizing fuel usage and improving our flare gas recovery systems across our main US sites. Those improvement projects resulted in an associated reduction of 28,953 tons of greenhouse gas emissions.

# GRI 303: Water and Effluents

## Management Approach:

As a shared and increasingly stressed resource, we strive to reduce our water footprint in production of our products through water reuse and recycling and by focusing on the continual improvement of operational excellence. Water is primarily used at our manufacturing facilities for cooling, production processes and steam production. Water is also used at our offices and manufacturing sites for drinking and sanitary use.

As water is such an integral part of our operations, we monitor each location's water use. Water is included as a sustainability metric in the Westlake Continuous Improvement Process which seeks to implement water management strategies to maximize efficiencies. Our 2020 optimization efforts and investments reduced our water footprint by 31,889,182 gallons and reduced our total water usage rate by 4.38% from 2019 despite increased production.

Water is managed via our corporate HSE system. Our water related KPIs are based on the American Chemistry Council definitions and are collected annually with relevant metrics reported to the Corporate Risk and Sustainability Committee at Board level. Westlake engages with stakeholders including regulators and local communities where necessary to deal with specific actual and potential water-related impacts.

In many of our manufacturing plants, we reuse water to limit our withdrawals and operate our own water treatment facilities providing greater oversight of water discharges at the majority of our manufacturing locations. We comply with all laws and requirements and limits as outlined in our water discharge permits in the jurisdictions in which we operate such as the National Pollutant Discharge Elimination System permits of the US Environmental Protection Agency (EPA). We continually monitor regulatory developments.

We apply a range of measures to avoid or minimize our emissions to water, including the ongoing water quality monitoring to identify irregular discharges and the treatment and recycling of wastewater and process water. We have emergency response plans in place to manage any unplanned discharges or chemical spills based on the substance and quantity originating from our chemical and building material plants or barges.

We work with the national, state and local stakeholders (including National Response Center) to communicate and coordinate an appropriate response. We submit a Toxic Release Inventory annually to the US EPA which describes our management of chemicals released to the environment and /or managed through recycling, energy recovery and treatment.

## 303-1: INTERACTIONS WITH WATER AS A SHARED RESOURCE

Water disclosures (millions of gallons)	
Total water withdrawal	130,671
Total water discharged	113,054
Total water consumption	17,277

### 303-2: MANAGEMENT OF WATER DISCHARGE-RELATED IMPACTS

We comply with all laws and requirements and limits as outlined in our water discharge permits in the jurisdictions in which we operate.

### 303-3: WATER WITHDRAWAL

See table above for total water withdrawal.

### 303-4: WATER DISCHARGE

See table above for total water discharged. Our substances of concern vary by jurisdiction and include, but are not limited to, metals, organic and inorganic pollutants, pH, temperature and dissolved oxygen. Westlake had 44 incidences of non-compliance with discharge limits in 2020.

Information unavailable/incomplete. Disclosure of this indicator is under consideration.

### 303-5: WATER CONSUMPTION

See table above for total water consumption.

Information unavailable/incomplete. Disclosure of this indicator is under consideration.

# GRI 305: Emissions

## Management Approach:

As a major manufacturer, our core operations require significant energy use. We strive to improve efficiencies and reduce energy use at our facilities and along our value chains to meet customer demand for products with a lower carbon footprint.

To reduce our emissions, we are continually optimizing our facilities and operations as well as producing and distributing sustainable products like polyethylene, low-carbon caustic soda and vinyl building products. Doing so allows us to improve cost-efficiency while at the same time reducing our greenhouse gas emissions.

We are strongly committed to preventing pollution. We adhere to all laws and to the terms of our permits in the jurisdictions where we operate. Each site's emissions are reported annually in line with widely accepted and recognized emission factors and methodologies. Relevant KPIs are reported to the Corporate Risk and Sustainability Committee at Board level. We also submit an Air Emission Inventory to the US EPA as required by local jurisdictions and continue to monitor emerging regulatory standards that pertain to emissions across our jurisdictions.

Between 2016 and 2020, we've recorded a decrease in total Scope 1 and Scope 2 emissions by 8.73% despite a 4.84% increase in production given the inclusion of our newly incorporated building products segment in 2020.

### 305-1: DIRECT (SCOPE 1) GHG EMISSIONS

Scope 1 and 2 Greenhouse Gas Emissions (million tons of CO2e)	
Scope 1 emissions (all gases included)	6.87
Scope 2 emissions (all gases included)	2.75
<b>Total emissions</b>	<b>9.62</b>

Scope 1: Direct emissions from facilities operated by Westlake  
 Scope 2: Indirect emissions from purchased energy

Greenhouse Gas Intensity (CO2e per ton of production)	
GHG intensity ratio (Scopes 1 & 2)	0.49

We used the following methodology to calculate our GHG emissions: the US EPA GHG Mandatory Reporting Rule (40 CFR Part 98) and provider-specific emission factors for utility purchases.

Our German operations participate in the European Union Emission Trading Scheme and make up one percent of our gross global Scope 1 GHG emissions.

### 305-2: INDIRECT (SCOPE 2) GHG EMISSIONS

See table and summary above for total scope 2 emissions.

### 305-5: REDUCTION OF GHG EMISSIONS

See summary above for reduction in greenhouse gas emissions.

### 305-4: GHG EMISSIONS INTENSITY

See table and summary above for greenhouse gas emissions intensity information.

### 305-7: NOX, SOX AND OTHER SIGNIFICANT AIR EMISSIONS

We actively monitor and track these emissions but currently only disclose information relating to nitrogen oxides (NOx), sulfur oxides (SOx) and hazardous air pollutants (HAPs). Disclosure of data relating to volatile organic compounds (VOCs) and particulate matter (PM) will be included in our 2021 disclosures.

We used the following methodology to calculate our GHG emissions: The US EPA GHG Mandatory Reporting Rule (40 CFR Part 98) and provider-specific emission factors for utility purchases.

Other Air Emissions (tons)	
NOx	7,860
SOx	59
HAPs	624



## GRI 306: Waste

### Management Approach:

#### 306-1: WASTE GENERATION AND SIGNIFICANT WASTE-RELATED IMPACTS

#### 306-2: MANAGEMENT OF SIGNIFICANT WASTE RELATED IMPACTS

Our production facilities process some volatile and hazardous materials that subject us to operating risks that could adversely affect our operating results. Our industry is also highly regulated and monitored by various environmental regulatory authorities such as the EPA, federal or state in other countries and the European Union.

The manufacturing of polyethylene and PVC resins, chlorine and caustic produce both hazardous and non-hazardous solid and liquid wastes. Each site has its own waste management plan under the HSE management system and systematically tracks and monitors its hazardous and non-hazardous waste inventories. Waste management contractors are subject to audits by Westlake or by a third-party. Westlake's waste management is also assessed at the corporate and board levels. We strictly adhere to all regulatory requirements, including those outlined in permits.

We strive to reduce waste being directed to landfills by transforming it into feedstock for our products wherever possible. By adopting a circular economy approach to our waste management, we are better able to reduce our environmental impact while improving our operational costs. In 2020, we reduced our total wastes generated by 31.1%, including a 15.2% reduction in hazardous wastes over 2019.

#### 306-3: TOTAL WASTE GENERATED

Waste by type (pounds)	
Total waste	257,899,476
Non-hazardous waste	177,486,654
Hazardous waste	80,412,822

# Disclosures for Ethics and Compliance

## Management Approach:

We are committed to conducting our activities to the highest ethical standards and in compliance with all applicable laws and regulations across the jurisdictions in which we operate. We will only do business according to the laws that govern and promote free and fair competition. This includes strict compliance with US antitrust laws and, where applicable, with the antitrust laws of other countries. The integrity and ethical conduct of our business dealings and relationships is critical not only to our success but also maintaining the trust of our stakeholders including governments and societies, actual and potential investors, as well as our business partners and suppliers.

Our commitments to ethics and compliance are enforced through the [Code](#) and Suppliers' Code. The Code sets out our expectation on topics such as conflicts of interest, anti-trust activities, fraud and theft, accuracy of records, government investigations and how to report concerns, etc. Our General Counsel oversees the legal team which, together with management, ensures that corruption and bribery risks are assessed and mitigated across all our operations on a regular basis. Relevant risks and risk management processes and policies are further reviewed at the corporate and Board levels. All business partners can access the Code via our website.

## Communication and Training

All employees, including our eight Executive Officers as well as our 11 Board members, are trained in compliance with the Code, which includes anti-corruption and anti-bribery. Employees in roles identified as high risk are required to undertake additional targeted training. Each Westlake employee must complete a biannual review and agree to abide by the Code. Ethics-related e-learning materials are accessible to employees via our Intranet. A global rollout of our updated Code was launched in the fall of 2021. The rollout of the new Code included delivery of an online training module available in nine languages, as well as documented acknowledgement by each employee.

## Monitoring and Grievance Mechanisms

We periodically conduct audits to ensure compliance with policies, procedures, laws, and regulations, including those related to anti-corruption and anti-bribery. Employees and contractors who observe or become aware of possible improper conduct are encouraged to report their concerns to their direct supervisors, another manager, Human Resources, or the Legal Department. Alternatively, suspected misconduct can be reported via Westlake's confidential, 24-hour multilingual reporting system, EthicsPoint. It is operated by a third-party company specializing in workplace incident reporting for multi-national companies. Westlake does not tolerate retaliation against anyone who reports a concern.

More information on our governance can be found here:

- <https://investors.westlake.com/governance/governance-documents/default.aspx>

## GRI 205: Anti-corruption

### 205-1: OPERATIONS ASSESSMENT FOR RISKS RELATED TO CORRUPTION

See summary above. No significant risks related to corruption were identified in 2020.

### 205-2: COMMUNICATION AND TRAINING ABOUT ANTI-CORRUPTION POLICIES AND PROCEDURES

See Communication and Training summary above. Our compliance and ethics program and related policies are communicated to all our employees, including our eight Executive Officers as well as to all eleven Directors on our Board of Directors. Training in anti-corruption and anti-bribery is included in this communication.

### 205-3: CONFIRMED INCIDENTS OF CORRUPTION AND ACTIONS TAKEN

In 2020, Westlake reported zero incidences of corruption and no legal proceedings against the company or its employees.

## GRI 206: Anti-competitive Behavior

### 206-1: LEGAL ACTIONS FOR ANTI-COMPETITIVE BEHAVIOR, ANTITRUST, AND MONOPOLY PRACTICES

A Westlake subsidiary has been named in a European Commission decision regarding certain anti-competitive practices in the purchasing of ethylene that occurred prior to 2017. Westlake voluntarily disclosed these practices, fully cooperated with the related investigation, and received full immunity from government fines in 2020. Three other parties paid fines.

For more information see the following links:

- [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_20\\_1348](https://ec.europa.eu/commission/presscorner/detail/en/ip_20_1348)
- <https://www.westlake.com/news/westlake-chemical-corporation-issues-statement-regarding-european-commission-investigation>

## GRI 207: Tax

### 207-1 APPROACH TO TAX

Our tax strategy is closely aligned to our business strategy and to our sustainability goals and strives to comply fully with tax regulations. We strive for transparency in our tax disclosures as required by the jurisdictions in which we operate. We see our efficient approach to tax matters as integral to our business strategy and long-term value creation. Efficient tax management includes finding opportunities to add value within the confines of the various tax laws. We are committed to acting with integrity with regards to tax matters, including fully complying with the letter and spirit of the law in the jurisdictions in which we operate. We observe all applicable laws and regulations, including reporting and disclosure requirements.

### 207-2: TAX GOVERNANCE, CONTROL, AND RISK MANAGEMENT

Tax governance is part of our accounting and finance function, which is overseen by the Chief Financial Officer and further supported by the Head of Tax and direct reports. The Tax Department continuously updates the Chief Financial Officer on all material tax topics, including their current and future impacts on our financials and cash flow. Business segments, senior leadership and the Board are also regularly updated on any changes to key tax issues, such as legislative developments. Day-to-day tax matters fall under the remit of our Tax Department and their direct reports in the appropriate jurisdictions. Their responsibilities include coordinating and communicating with local tax functions as well as country-specific tax experts to promote compliance with relevant tax matters wherever we operate. This also ensures that local tax risks are being assessed from a global perspective so to better ensure that they are being reported and managed appropriately.

### 207-3: STAKEHOLDER ENGAGEMENT AND MANAGEMENT OF CONCERNS RELATED TO TAX

We develop our tax positions in on-going dialogue with key stakeholders. We have working relationships with the various tax authorities in the jurisdictions in which we operate and, in addition to Country-by-Country Reporting, we also implement and report through the European DAC 6 Directive.

### 207-4: COUNTRY-BY-COUNTRY REPORTING

As outlined on page 117 of our Annual Report, we operate within the United States, Canada, Germany, China, Italy, Taiwan, and various other jurisdictions. We are subject to changes in applicable tax laws, treaties, regulations, or statutes.

Our provision for income taxes and compliance is accounted for each country and for each state within the United States.

The compliance and provision include:

- Federal/US income tax
- State income and franchise tax
- Foreign income tax
- Property tax
- Sales and use tax
- Value Added Tax (VAT)

# Disclosures for Community Engagement and Impact Management

## GRI 413: Local Communities

### Management Approach:

We recognize the importance of supporting the communities in which we work and live and make it a priority to take an active role in making these communities better. Our business positively impacts the local communities in which we operate — providing employment opportunities and community development through taxes and charitable donations. Effective community engagement helps mitigate potential disruption and regulatory risks all while allowing us to attract and retain employees and to maintain our strong relationships with the localities in which we operate. We utilize a variety of community engagement strategies to best respond to the unique needs of each local site.

Westlake's Head of Communications and Government Relations provides corporate guidance and leadership on our stakeholder engagement, community investments, corporate giving, and volunteer efforts, which are provided to senior leadership and the board at least annually. We also empower our site managers to serve as the primary engagement leads in our communities and provide them with budgetary powers to that end.

We engage with local communities from across our business. Our Health, Safety and Environment Policy requires us to prepare environmental and social impact assessments on the development of greenfield sites. Where relevant this will include engagement with local communities. Our Product Stewardship team manages the safe transportation of hazardous chemicals through local communities while our HSE policy engages with local emergency services and media as part of its hazard management and emergency response. Where possible we also source services to our business from local suppliers.

Our Vinnolit facilities in Germany participate in Responsible Care®, a voluntary initiative of chemical companies aiming for continuous improvements in environmental protection, health and safety. As a part of this commitment this location implements 3.7 of the Responsible Care Management System and the Responsible Care Process Safety Code, including: consideration of communications and community recovery needs; participation in the development, implementation, and maintenance of community emergency preparedness plans; and an appropriate process for responding to raw material, product, process, waste material and transportation incidents. Best practice from this process is shared across the business.

Information and examples of community engagement see page 38 in our 2020 ESG Report.



#### 413-1 OPERATIONS WITH LOCAL COMMUNITY ENGAGEMENT, IMPACT ASSESSMENTS, AND DEVELOPMENT PROGRAMS

Westlake actively engages with local communities to manage potential concerns associated with our operations such as light, noise, air emissions and traffic. We engage with communities around our operations from the earliest stages of planning, through permitting, construction and operations. If it is a new facility being built, we engage in public forums, information presentations and plant tours to encourage two-way dialogue with residents to understand and address their concerns. For example, to mitigate construction traffic during an expansion project we utilized barges and other watercraft for the delivery of heavy goods. We also comply with local and national regulations including conducting environmental impact assessment on the local communities (e.g., OSHA, LDEQ) when applicable.

We are continuously improving efforts across many manufacturing sites to limit our impacts on local communities. These efforts include adopting new technologies and making operations more efficient to reduce pollution risks like air pollutants. To be more transparent on this issue, we publish our Hazardous Air Pollutants (HAPs) which are a subset of chemicals identified by the US Environmental Protection Agency (EPA) in its Toxics Release Inventory (TRI).

Additionally, we host Community Advisory Panels at our chemical manufacturing facilities multiple times a year depending on the necessity. These Panels, which are facilitated by an independent third-party contractor, are designed as an open forum to share and receive feedback and suggestions on behalf of the community. Some of our sites, like Lake Charles and Geismar, Louisiana, are in more densely populated areas and therefore

engagement is done on a continuous basis. We proactively share relevant information with these Community Advisory Panels, for example on planned maintenance activities, schedules of heavy good deliveries, and traffic mitigation strategies etc. Members of this stakeholder group may include local police, elected officials, community and neighborhood groups and schools.

Building a local workforce and supplier base is how we, as a business, can have the biggest impact on the local community. Many of our facility employees and senior management are from the local community.<sup>4</sup> Westlake pays wages that are competitive rather than legally defined minimum wages. We align our community investments with local needs, delivering relevant and lasting socioeconomic benefits.

Westlake invests in projects to contribute to community priorities including local education and health providing lasting social and economic value. In 2020, we spent approximately US\$1.56 million globally on community investment projects. Furthermore, employees in Kentucky, Louisiana, Mississippi, Texas and West Virginia, representing the US states of largest employment in 2020, donated US\$1.4 million to the United Way or equivalent agencies in 2020. In 2020, we invested in opportunities for students, including scholarships for college-age students of our employees in North America, provided materials and financial contributions for COVID-19 and hurricane relief efforts and volunteered.

#### DISCLOSURE 413-2 OPERATIONS WITH SIGNIFICANT ACTUAL AND POTENTIAL NEGATIVE IMPACTS ON LOCAL COMMUNITIES

At Westlake, we are proud to operate in the communities in which we are located and work to ensure we positively impact those same communities. We monitor and evaluate internally a negative impact on those communities, but do not publicly report.

<sup>4</sup>Identified to mirror the IRS definition for relocation; within a 50-mile radius from the address of the significant location of operation (worksite).

# Disclosures for Diversity and Inclusion

## Management Approach:

The development of a diverse and inclusive working environment supports our ability to recruit, motivate and retain the talent we need to achieve our business objectives. We recognize that a diverse workforce that reflects the communities in which we operate is critical to our business success and in providing solutions for our customers. We have a zero-tolerance approach to discrimination against employees, or applicants, on any basis — which is set out in the Code and corporate policies.

As an Asian American and Pacific Islander (AAIP) majority-owned and founded business, we feel a special commitment to ensuring that Westlake proactively offers opportunities for Black, Indigenous and People of Color (BIPOC), members of the LGBTQIA+, disability and veteran communities to join our company and to succeed as members of our team. As of the end of 2020, 18.6% of our North American employees self-identified as BIPOC. Although we do not collect demographic data in our European and Asian operations, we are a diverse, multinational company.

The Code sets out our expectations on topics regarding operating with integrity. We follow all laws that prohibit discrimination in employment in all locations where we do business. Our policy makes every effort equal employment and opportunity for advancement without discrimination based on race, color, sex, sexual orientation, gender identity, national origin, religion, physical or mental disability, age, veteran status, marital status, familial status, pregnancy, citizenship, or any other category protected by law. Management has incorporated specific activities into many HR programs to ensure that actions are taken that result in objective outcomes, which do not reflect bias or unfavorable results for females, BIPOC or LGBTQIA+ employees.

## Employee Engagement and Training

All employees must agree to comply with the Code and receive training in all our ethics and anti-harassment related policies. In the US, this policy applies to all employees and applicants across all employment activities. Westlake businesses not subject to US law shall apply the intent and provisions of this policy consistent with national or local laws in other countries. Each Westlake employee must complete a biannual review and certification to the Code. A global rollout is planned for the updated Corporate Code of Conduct in fall 2021. There will be a training module available in ten languages, as well as documented acknowledgement by each employee.

In 2020, we launched a 10-Step Diversity Action Plan, to ensure we are able to have a more diverse, equitable, and inclusive environment for our Westlake Family. The Plan includes setting diversity goals for our workforce and executives, providing action plans, tracking and reporting, determining data collection, creating company-wide programs based on best practice, internal communication mechanisms, and addressing compensation levels.

Westlake recognizes that women have historically been underrepresented in the manufacturing sector and we are actively looking to increase the number of women we employ at our plants.

Within the communities we serve, Westlake supports STEAM (Science, Technology, Engineering, Art and Math) Programs, and we provide support to those who identify themselves as women in the STEAM industry.

The Women of Westlake (WOW) Leadership Group supports our ongoing efforts to create a more diverse and inclusive environment. Launched in Houston, Texas in 2018, it consists of 50 women, who meet regularly monthly to support each other through peer-to-peer coaching, informal mentorship, and the group is a way to support both professional and personal growth for women at Westlake. Our WOW Leadership Group was featured in the Vinyl Sustainability Council's +Vantage Vinyl Sustainability 2020 Progress Report.

In 2021, Westlake provided sexual harassment training according to specific state compliance requirements. Westlake also engaged Blue Ocean Brain, professional development experts, to begin offering more DE&I related content, including learning modules such as:

- Encouraging Connections — Inclusion at Work
- Working Cross-Culturally from a Distance
- Leading During Uncertainty
- Unseen Similarities

## Grievance Mechanism

EthicsPoint is a confidential website and 24-hour hotline that employees can use to report workplace concerns without fear of retaliation. It is operated by a third-party company specializing in workplace incident reporting for multi-national companies. Employee relations and inappropriate behavior, including discriminatory behavior, may be among the types of issues that employees report, and the company addresses because of this service. EthicsPoint contact information is made readily available to employees throughout the company. Employees are also encouraged to contact their management team, Human Resources or the Office of the General Counsel.

Information on our activities on this topic including our 10-step diversity action plan and supporting employees at all stages of their careers please see page 36 of our 2020 ESG Report.

## GRI 405: Diversity and Equal Opportunity

### 405-1: DIVERSITY OF GOVERNANCE BODIES AND EMPLOYEES

	Percentage of individuals within the Board of Directors (11)	Percentage of individuals within the other Executive Officers (7)	Percentage of individuals within the Board of Directors and Executive Officers (18)	Percentage of employees (9,220) *
Male	82.0%	100.0%	88.9%	84.1%
Female	18.0%	0.0%	11.1%	15.9%
Under 30	0.0%	0.0%	0.0%	11.1%
30-50	18.0%	29.0%	22.2%	47.5%
Over 50	82.0%	71.0%	77.8%	41.4%
Minority **	45.0%	0.0%	27.8%	18.6%*
Non-minority	55.0%	100.0%	72.2%	81.0%*
Undisclosed	0.0%	0.0%	0.0%	0.4%*

\*Race/ethnicity data relates to US and Canada only (6,899 employees). Gender and age data relates to all employees globally (9,220).

\*\* Black, Indigenous and People of Color (BIPOC).

### 405-2: RATIO OF BASIC SALARY AND REMUNERATION OF WOMEN TO MEN

Each year, as part of the annual mid-year review process, Human Resources does a comprehensive review of base salaries of females compared to males as well as white compared to BIPOC employees. A special budget is applied to address specific cases during this review and during the regular annual compensation planning.

## GRI 406: Non-discrimination

### 406-1: INCIDENTS OF DISCRIMINATION AND CORRECTIVE ACTIONS TAKEN

Employees may raise a concern without fear of retaliation through an independent whistle-blower telephone helpline and website (Ethics Point), which is available 24 hours a day in ten languages in every country where we operate. It is operated by a third-party company specializing in workplace incident reporting for multi-national companies.

# Disclosures for Product Responsibility

## Management Approach:

Westlake's primary products are Olefins (ethylene, polyethylene and styrene monomer) and Vinyls (PVC, VCM, EDC, Chlorine, Caustic Soda and Ethylene). Ensuring our products are safe for our customers, employees, communities, and the environment is critical to maintaining Westlake's reputation and trust and to our ability to meet our legal and regulatory obligations.

The potential impacts on human and environmental health from chemicals during the use-phase can influence product demand and regulatory risk, which in turn can affect revenues and result in higher operating expenses, regulatory compliance costs, and mitigation expenses. Our approach to product responsibility is guided by regulatory requirements and industry best practice. We utilize industry associations and technology to monitor changes to those requirements and standards and communicate hazard risk effectively to our customers, suppliers and employees. Through collaboration across the business and via feedback from our customers, we review materials and suggest safer alternatives when appropriate.

Product responsibility is managed by a growing Product Stewardship team in coordination with technical and product experts within each business to oversee and collaborate on the safe handling of hazardous chemicals at every stage including:

### RESEARCH AND DEVELOPMENT

Meet on a regular basis to review products and raw materials, suggesting safer alternatives where possible.

### AUTHORIZATION

Registration of substances and finished products with relevant authorities and continually monitoring for regulatory changes.

### MANUFACTURING AND PRODUCTION

Manage and review the process for new chemicals to be used in our facilities including new raw materials or process aids used in manufacturing; provide safety labels for internal use, communicate safe handling procedures to employees.

### MARKETING AND PROMOTION

Working with teams on compliant labelling and publishing Safety Data Sheets for all our products on our website. Storage, distribution, and supply — reviewing shipments for compliance, managing packaging specifications.

### USE AND SERVICE

Evaluate the composition of finished products, advise customers on safe handling and hazard management.

### DISPOSAL, REUSE, OR RECYCLING

Advising on regulations and prohibitions, integrating, post-industrial waste re-use in vinyl products, support pilot programs via the Materials Recovery for the Future (recycling flexible packaging in Pennsylvania) and the Alliance to End Plastic Waste (plastic waste processing facility in Indonesia).

Our approach to product responsibility incorporates our commitment to continuous improvement and regulatory compliance. We have chemical control procedures in place to comply with applicable regulations and we monitor any changes to requirements via multiple sourcing including a direct news feed from Chemical Watch, a global provider of intelligence for chemical product safety professionals. The regulatory information is shared across the business including our research and innovation teams to ensure we are developing products in line with the most up-to-date regulations. We comply with applicable or relevant regulations on the safe management of chemicals through the value chain from manufacturing, importation, distribution, storage, transportation and use. Regulations include but are not limited to:

- USA — Toxic Substances Control Act (TSCA)
- USA — Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)
- EU — European Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals (REACH)
- EU — Biocidal Products Regulation
- Taiwan — Toxic Chemical Substances Control Act
- China — Decree No. 591
- Korea — Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals (REACH)
- USA — Dodd-Frank Wall Street Reform and Consumer Protection Act

In 2020, Westlake published [Safety Data Sheets](#) (SDSs) for all products on our website and are electronically shipped (in the USA), ensuring transparency with our customers on the safe use of our products. The SDSs provide information on the properties of each chemical, the physical health and environmental health hazards, protective measures, and safety precautions for handling, storing and transporting the chemical. In some jurisdictions Westlake will go above compliance in its labelling to ensure information is consistently communicated to the highest standard possible. In 2022, we will be continuing to improve the content of our hazard communications with the integration of an on-premises solution that will provide quicker updates to SDSs in line with new regulations and inform employees and customers of those changes.

Westlake also publishes [Product Stewardship Summaries](#) for our major products. The Summaries include further detailed information on the product, its production, uses, health effects, environmental effects, exposure potential, safe handling and storage, fire and explosion hazards, regulatory requirements, etc. Furthermore, we work directly with customers during the product development to meet their standards. When we ship certain products like chlorine, we undertake a chlorine assessment process and engage with our customer to confirm the safe handling of the product by the customer once it is delivered to them.

Westlake registers substances with the relevant regional and national authorities. We are members of the Chlorine Institute, a technical trade association for sharing best practice and managing the safe production, distribution and use of chlor-alkali for our value chain, customers, emergency responders and the community. As members of the Chlorine Institute, we do voluntary customer site evaluations for the safe handling of chlorine at their facilities every five years.

Our German facilities prescribe to Responsible Care, a voluntary initiative of chemical companies aiming for continuous improvements in environmental protection, health and safety. As a part of this commitment this location implements 3.7 of the Responsible Care Management System and the Responsible Care Process Safety Code, including: consideration of communications and community recovery needs; participation in the development, implementation and maintenance of community emergency preparedness plans; and an appropriate process for responding to raw material, product, process, waste material and transportation incidents.

We incorporate environmental hazard and human health (inhalation studies, dermal exposure) and safety criteria into our testing and risk evaluation, based on best practice from industry groups and regulatory bodies. We engage with employees in the safe handling of these materials and manage the system that maintains the Safety Data Sheets for employees to access.

When applicable, we develop and/or use alternative technologies and raw materials as safer alternatives. Westlake conducts animal-free chemical safety assessments. Our products do not contain genetically modified materials.

## GRI 416: Customer Health & Safety

### 416- 1: ASSESSMENT OF THE HEALTH AND SAFETY IMPACTS OF PRODUCT AND SERVICE CATEGORIES

In 2020, any new hazardous product brought to market was assessed for impacts to human health, safety, and the environment. The results of these assessments are what drive the content of our Safety Data Sheets (available on our website) and the information is included on our product labels.

## GRI 417: Marketing and Labelling

### 417-1: REQUIREMENTS FOR PRODUCT AND SERVICE INFORMATION AND LABELLING

All products are to be labelled in compliance with the country in which they are sold. This includes the place of manufacture, but not necessarily the sourcing of the components. In regions where the Ecotox components of the Globally Harmonized System have been adopted products are labelled with information regarding substances that could have an environmental impact if they are above the limits defined by the regulation. In other regions where these components are not mandatory this information is often included as well. Labels for products include information, where appropriate, about safe use, handling, and disposal. Disposal considerations are addressed on the labels of hazardous products, as well as in the Safety Data Sheet. We encourage all customers to comply with all federal, state, and local regulations. If specific information on disposal is available that is provided as well.

The Product Stewardship team is in the process of working with the business to review all labels. In doing so, we are implementing systems to make the current label information visible to anyone in the company, assigning an owner to the information, and setting up automated reminders to trigger reviews on a predetermined schedule. This will ensure that we have reviewed 100% of all label information and a system is in place to ensure it is current.

### 417-2: INCIDENTS OF NON-COMPLIANCE CONCERNING PRODUCT AND SERVICE INFORMATION AND LABELLING

In 2020, there were no fines or penalties resulting from incidents of noncompliance with regulations or voluntary codes concerning information and labelling of products and services. One incident occurred that resulted in a warning. This is only reflective of data from our USA locations.

### 417-3: INCIDENTS OF NONCOMPLIANCE CONCERNING MARKETING COMMUNICATIONS

In 2020, Westlake had no incidences of noncompliance with regulations or voluntary codes concerning marketing communications. This is only reflective of data from our USA locations.



# GRI Content Index

- FULLY COLLECTED
- PARTIALLY COLLECTED
- OMITTED

DISCLOSURE	STATUS	ESG APPENDIX	ESG REPORT	ANNUAL REPORT	WEBSITE	OMISSION
<b>GENERAL DISCLOSURES 2021</b>						
<b>1. The organization and its reporting practices</b>						
2-1	Organizational details	●	8			
2-2	Entities included in the organization's sustainability reporting	●	8		8	
2-3	Reporting period, frequency and contact point	●	8			
2-4	Restatements of information	●	8			
2-5	External assurance	●	8			
<b>2. Activities and workers</b>						
2-6	Activities, value chain and other business relationships	●	9	6, 15	Item 1	
2-7	Employees	●	9			
2-8	Workers who are not employees	●	9			

DISCLOSURE	STATUS	ESG APPENDIX	ESG REPORT	ANNUAL REPORT	WEBSITE	OMISSION
<b>3. Governance</b>						
2-9	Governance structure and composition	●	10	6		Governance webpage
2-10	Nomination and selection of the highest governance body	●	10		9-11	
2-11	Chair of the highest governance body	●	10		5, 7	
2-12	Role of highest governance body in overseeing the management of impact	●	10	6		Governance webpage
2-13	Delegation of responsibility for managing impacts	●	10	8		
2-14	Role of the highest governance body in sustainability reporting	●	11	8		Governance webpage
2-15	Conflicts of interest	●	11		24	Governance webpage
2-16	Communicating critical concerns	●	11			
2-17	Collective knowledge of highest governance body	●	11		10-12	
2-18	Evaluating the highest governance body's performance	●	11		6	
2-19	Remuneration policies	●	11		14	
2-20	Process to determine remuneration	●	11		14	
2-21	Annual total compensation ratio	●	11		25	

- FULLY COLLECTED
- PARTIALLY COLLECTED
- OMITTED

DISCLOSURE	STATUS	ESG APPENDIX	ESG REPORT	ANNUAL REPORT	WEBSITE	OMISSION
<b>4. Strategy, policies and practices</b>						
2-22	Statement from sustainable development strategy	●	12	3		
2-23	Policy Commitments	●	12			
2-24	Embedding policy commitments	●	12			
2-25	Process to remediate negative impacts	●	12			
2-26	Mechanisms for seeking advice and raising concerns	●	12			
2-27	Compliance with laws and regulations	●	13			Confidentiality constraints.
2-28	Membership of associations	●	13	17		
<b>5. Stakeholder engagement</b>						
2-29	Approach to stakeholder engagement	●	13	6, 15	Item 1	
2-30	Collective bargaining agreements	●	13			
<b>MATERIAL TOPICS 2021</b>						
Material Topics 2021						
3-1	Process to determine remuneration	●	6, 7			
3-2	List of material topics	●	6, 7			
3-3	Management of material topics	●	6, 7			

DISCLOSURE	STATUS	ESG APPENDIX	ESG REPORT	ANNUAL REPORT	WEBSITE	OMISSION
<b>GRI 200: ECONOMIC</b>						
<b>GRI Standard 205: Anti-corruption (2016)</b>						
103-1	Management approach	●	34, 35		Governance webpage	
205-1	Operations assessed for risks related to corruption	●	34, 35			
205-2	Communication and training about anti-corruption policies and procedures	●	34, 35			
205-3	Confirmed incidents of corruption and actions taken	●	34, 35			
<b>GRI Standard 206: Anti-competitive behavior (2016)</b>						
103-1	Management approach		34, 35			
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices		36			

- FULLY COLLECTED
- PARTIALLY COLLECTED
- OMITTED

DISCLOSURE	STATUS	ESG APPENDIX	ESG REPORT	ANNUAL REPORT	WEBSITE	OMISSION
<b>GRI Standard 207: Tax (2019)</b>						
103-1	Management approach		34, 37			
207-1	Approach to tax		37			
207-2	Tax governance, control, and risk management		37			
207-3	Stakeholder engagement and management of concerns related to tax		37			
207-4	Country-by-country reporting		37			Confidentiality constraints. We have not disclosed details relating to 207-4-b. We will assess additional disclosure on a yearly basis.

**GRI 300: ENVIRONMENTAL**

**GRI Standard 301: Materials (2016)**

103-1	Management approach	●	22-24	26		
301-1	Materials used by weight or volume	●	25			
301-2	Recycled input materials used	●	25			Information unavailable. Results are not aggregated at the corporate level or reported publicly. Disclosure of this indicator is under consideration.
301-3	Reclaimed products and their packaging materials	●	25			Information unavailable. Results are not aggregated at the corporate level or reported publicly. Disclosure of this indicator is under consideration.

DISCLOSURE	STATUS	ESG APPENDIX	ESG REPORT	ANNUAL REPORT	WEBSITE	OMISSION
<b>GRI Standard 302: Energy (2016)</b>						
103-1	Management approach	●	22- 23, 26			
302-1	Energy consumption within the organization	●	27			
302-2	Energy consumption outside of the organization	●				Information unavailable. Results are not reported publicly.
302-3	Energy intensity	●	27	22		
302-4	Reduction of energy consumption	●	27			
302-5	Reduction in energy requirements of products and services	●				Information unavailable. Results are not reported publicly. Disclosure of this indicator is under consideration.
<b>GRI Standard 303: Water and effluents (2018)</b>						
103-1	Management approach	●	22-23, 28			
303-1	Interactions with water as a shared resource	●	29			
303-2	Management of water discharge-related impacts	●	29			
303-3	Water withdrawal	●	29			Information unavailable. Results are not aggregated at the corporate level or reported publicly. Disclosure of this indicator is under consideration.
303-4	Water discharge	●	29			Information unavailable. Results are not aggregated at the corporate level or reported publicly. Disclosure of this indicator is under consideration.
303-5	Water consumption	●	29			Information unavailable. Results are not aggregated at the corporate level or reported publicly. Disclosure of this indicator is under consideration.

- FULLY COLLECTED
- PARTIALLY COLLECTED
- OMITTED

DISCLOSURE	STATUS	ESG APPENDIX	ESG REPORT	ANNUAL REPORT	WEBSITE	OMISSION
<b>GRI Standard 305: Emissions (2016)</b>						
103-1	Management approach	●	22-23, 30			
305-1	Direct (Scope 1) GHG emissions	●	31			
305-2	Energy indirect (Scope 2) GHG emissions	●	31			
305-3	Other indirect (Scope 3) GHG emissions	●				Information unavailable. Disclosure of this indicator is under consideration.
305-4	GHG emissions intensity	●	31			
305-5	Reduction of GHG emissions	●	31			
305-6	Emissions of ozone-depleting substances (ODS)	●				Information unavailable. Disclosure of this indicator is under consideration.
305-7	Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions	●	31			
<b>GRI Standard 306: Waste (2020)</b>						
103-1	Management approach	●	22-23, 32			
306-1	Waste generation and significant waste-related impacts	●	32			
306-2	Management of significant waste-related impacts	●	32			
306-3	Waste generated	●	33			
306-4	Waste diverted from disposal	●				Information unavailable. Disclosure of this indicator is under consideration.
306-5	Waste directed to disposal	●				Information unavailable. Disclosure of this indicator is under consideration.

DISCLOSURE	STATUS	ESG APPENDIX	ESG REPORT	ANNUAL REPORT	WEBSITE	OMISSION
<b>GRI 400: SOCIAL</b>						
<b>GRI Standard 403: Occupational health and safety (2018)</b>						
103-1	Management approach	●	14-16			
403-1	Occupational health and safety management system	●	16			
403-2	Hazard identification, risk assessment, and incident investigation	●	16-17			
403-3	Occupational health services	●	17			
403-4	Worker participation, consultation, and communication on occupational health and safety	●	18			
403-5	Worker training on occupational health and safety	●	18			
403-6	Promotion of worker health	●	18			
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	●	19			
403-8	Workers covered by an occupational health and safety management system	●	19			
403-9	Work-related injuries	●	20			
403-10	Work-related ill health	●	21			

- FULLY COLLECTED
- PARTIALLY COLLECTED
- OMITTED

DISCLOSURE	STATUS	ESG APPENDIX	ESG REPORT	ANNUAL REPORT	WEBSITE	OMISSION
<b>GRI Standard 405: Diversity and equal opportunity (2016)</b>						
103-1	Management approach	●	42-43	36		
405-1	Diversity of governance bodies and employees	●	44			
405-2	Ratio of basic salary and remuneration of women to men	●	44			Confidentiality constraints. Results are not reported publicly.
<b>GRI Standard 406: Non-discrimination (2016)</b>						
103-1	Management approach	●	42-43			
406-1	Incidents of discrimination and corrective actions taken	●	45			Information unavailable. Results are not reported publicly.
<b>GRI Standard 413: Local communities (2016)</b>						
103-1	Management approach	●	38-39	38		
413-1	Operations with local community engagement, impact assessments, and development programs	●	40			
413-2	Operations with significant actual and potential negative impacts on local communities	●	41			Confidentiality constraints. We continuously monitor and improve our practices to prevent negative impacts on communities.
<b>GRI Standard 416: Customer health and safety (2016)</b>						
103-1	Management approach	●	46-48			
416-1	Operations with local community engagement, impact assessments, and development programs	●	48			
416-2	Operations with significant actual and potential negative impacts on local communities	●				Confidentiality constraints. We continuously monitor and improve our practices to prevent serious events.

DISCLOSURE	STATUS	ESG APPENDIX	ESG REPORT	ANNUAL REPORT	WEBSITE	OMISSION
<b>GRI Standard 417: Marketing and labelling (2016)</b>						
103-1	Management approach	●	46-48			
417-1	Requirements for product and service information and labelling	●	49			
417-2	Incidents of non-compliance concerning product and service information and labelling	●	49			
417-3	Incidents of non-compliance concerning marketing communications	●	49			



# SASB Disclosure Index

TOPIC	ACCOUNTING METRIC	PAGE NUMBER	SASB CODE
Greenhouse Gas Emissions	Gross global Scope 1 emissions, percentage covered under emissions-limiting regulations	6,870,050 Tons CO2e  German operations make up 1% of gross global Scope 1 GHG emissions and are covered under the EU emissions trading scheme.	RT-CH-110a.1
	Discussion of long-term and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and an analysis of performance against those targets	Westlake has committed to reduce CO2 emissions by 20% by 2030 from a 2016 baseline. GRI 305, page 30	RT-CH-110a.2
Air Quality	Air emissions of the following pollutants: (1) NOX (excluding N2O), (2) SOX, (3) volatile organic compounds (VOCs), and (4) hazardous air pollutants (HAPs)	(1) 7,860 tons (2) 59 tons (3) This information is tracked but not currently reported. Disclosure is under consideration. (4) 624 tons	RT-CH-120a.1
Energy Management	(1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable, (4) total self-generated energy	(1) 198,000,000 GJ joules (2) 84% (3) 16% (4) This information is tracked but not currently reported. Disclosure is under consideration.	RT-CH-130a.1
Water Management	(1) Total water withdrawn, (2) total water consumed, percentage of each in regions with High or Extremely High Baseline Water Stress	(1) 130,671 gallons (millions) (2) This information is tracked but not currently reported. Disclosure is under consideration.	RT-CH-140a.1
	Number of incidents of non-compliance associated with water quality permits, standards, and regulations	44 incidences in 2020	RT-CH-140a.2
	Description of water management risks and discussion of strategies and practices to mitigate those risks	GRI 303, page 28	RT-CH-140a.3
Hazardous Waste Management	Amount of hazardous waste generated, percentage recycled	(1) 80,412,822 lbs. (2) This information is tracked but not currently reported. Disclosure is under consideration.	RT-CH-150a.1
Community Relations	Discussion of engagement processes to manage risks and opportunities associated with community interests	GRI 413, pages 38-40	RT-CH-210a.1
Workforce Health & Safety	(1) Total recordable incident rate (TRIR) and (2) fatality rate for (a) direct employees and (b) contract employees	(1) 0.70 (2a) 0.01 (2b) 0.0	RT-CH-320a.1
	Description of efforts to assess, monitor, and reduce exposure of employees and contract workers to long-term (chronic) health risks	GRI 403, pages 16-20; 46-48	RT-CH-320a.2

TOPIC	ACCOUNTING METRIC	PAGE NUMBER	SASB CODE
Product Design for Use-phase Efficiency	Revenue from products designed for use-phase resource efficiency	This metric is immaterial to Westlake operations.	RT-CH-410a.1
Safety & Environmental Stewardship of Chemicals	(1) Percentage of products that contain Globally Harmonized System of Classification and Labelling of Chemicals (GHS) Category 1 and 2 Health and Environmental Hazardous Substances, (2) percentage of such products that have undergone a hazard assessment	(1) 100% (2) 100%	RT-CH-410b.1
	Discussion of strategy to (1) manage chemicals of concern and (2) develop alternatives with reduced human and/or environmental impact	GRI 416 & 417, pages 46-48 GRI 403, pages 16-20	RT-CH-410b.2
Genetically Modified Organisms	Percentage of products by revenue that contain genetically modified organisms (GMOs)	0%	RT-CH-410c.1
Management of the Legal & Regulatory Environment	Discussion of corporate positions related to government regulations and/or policy proposals that address environmental and social factors affecting the industry	Information regarding to corporate positions on government regulations can be found in our 2020 Annual Report, Item 1.	RT-CH-530a.1
Operational Safety, Emergency Preparedness & Response	Process Safety Incidents Count (PSIC), Process Safety Total Incident Rate (PSTIR), and Process Safety Incident Severity Rate (PSISR)	This information is tracked but not currently reported. Disclosure is under consideration.	RT-CH-540a.1
	Number of transport incidents	This information is tracked but not currently reported. Disclosure is under consideration.	RT-CH-540a.2
Activity Metrics	Production by reportable segment	This information is tracked but not currently reported. Disclosure is under consideration.	RT-CH-000A



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