

A collage of four images: top-left shows two workers in hard hats and safety gear looking at blueprints; middle-left shows a woman in a blue work jacket and safety glasses working on a machine; bottom-left shows stacks of white extruded plastic profiles; bottom-right shows a hand in a blue glove pouring liquid into a beaker in a laboratory setting.

# Westlake

*Enhancing Your Life Every Day<sup>®</sup>*

## Supplier Code of Conduct



*Westlake is a vertically integrated global manufacturer and marketer of performance and essential materials and housing and infrastructure products that enhances the lives of people every day. Our products include some of the most widely used materials in the world, which are fundamental to many diverse consumer and industrial markets, including residential construction, flexible and rigid packaging, automotive products, healthcare products, water treatment, wind turbines, coatings as well as other durable and non-durable goods. Our mission is to serve our clients and wider stakeholders in an efficient and ethical manner, working within all applicable laws and recognized international frameworks governing labor and human rights, occupational health and safety, environmental protection, product safety and business ethics.*

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This code of conduct reflects Westlake's commitment to sustainable business practices and frameworks relevant to the chemicals industry, including the Dodd Frank Act in relation to conflict minerals.

Westlake desires to do business with suppliers who take their corporate social responsibility obligations seriously. Westlake, therefore, encourages suppliers to be socially and environmentally responsible, participate in sustainability programs, and be proactive in their approaches to deliver sustainable solutions.

We expect high standards of our employees, contractors and suppliers. In return we commit ourselves to providing a safe, responsible and fair environment in which to do business. Westlake reserves the right to audit suppliers against this code of conduct and to apply sanctions for any breaches of it.



# Legal Compliance

All suppliers to Westlake (Suppliers) shall ensure that all aspects of their business, operations and supply chains are conducted in accordance with all applicable local, state or provincial, national and international laws and regulations. This includes, but is not limited to, laws relating to labor, immigration, health and safety, business ethics and the environment.

# Health and Safety

Westlake places great value on the health and safety of those who work in our operations and supply chains. As such, Suppliers shall provide and maintain safe and healthy working environments for their employees and contractors, including but not limited to:

- Providing a safe and healthy working environment, in which the goal is to operate incident and injury free. This should include the provision and maintenance of appropriate personal protective equipment and safe systems of work.
- Ensuring that there is an effective emergency management system in place in order to respond appropriately in the event of an adverse incident.
- Where applicable, providing safe and clean accommodation, food, water and secure storage facilities for employees' or contractors' personal items whilst they are engaged at the Supplier's premises.
- Ensuring that employees and contractors are regularly and properly informed in a language they understand about health and safety issues. This should include appropriate literature and ongoing training.



# Environment

WWestlake seeks to ensure that its operations and supply chains operate within all local, national and international law in relation to environmental issues. As such, Suppliers are expected to implement and maintain high standards relating to environmental matters, including, but not limited to:

- Ensuring that they obtain and maintain in force all required permits to operate from relevant local or national authorities. Suppliers shall also seek to maintain a social license to operate from relevant local communities.
- Implementing a safe handling, storage and transportation system for all products and materials and ensuring that there is an appropriate system in place to mitigate the risk of any spillage or chemical release into the environment.
- Operating in a way that reduces, as far as practicable within reasonable commercial limits, greenhouse gas emissions.
- Managing and minimizing air, water, soil and noise emissions and to ensure that any waste material they generate is disposed of safely.



# Human Rights and Labor Rights

Westlake is committed to ensuring that its workers and contractors and those of its suppliers are treated fairly and in accordance with recognized international human and labor rights, meaning, as a minimum standard, Suppliers are expected to ensure:

- That no children are employed or engaged in any part of the Supplier's business. When determining what constitutes Child Labour for the purposes of this code of conduct, Suppliers should follow the ILO-IOE Child Labour Tool Kit, a copy of which is here: [https://www.ilo.org/ipec/Informationresources/WCMS\\_IPEC\\_PUB\\_27555/lang--en/index.htm&nbsp;sp](https://www.ilo.org/ipec/Informationresources/WCMS_IPEC_PUB_27555/lang--en/index.htm&nbsp;sp).
- That all employees and contractors have freely chosen and may freely leave their employment with the Supplier. This means the Supplier establishes and enforces a compliance program that prohibits the abuse and exploitation of employees and contractors, including prohibitions against requiring employees and contractors to pay recruitment fees to obtain work, against removing an employee's or contractor's identity documents from their person, and against human trafficking or forced labor. If a Supplier is engaging migrant workers within its operations or supply chain, it should implement the Dhaka Principles for Migration with Dignity, a copy of which is here: [Dhaka Principles - for migration with dignity](#).
- That no employee or contractor of the Supplier is subject to any form of discrimination, harassment, abuse, bullying or neglect based on race, color, gender, age, nationality, religion, social origin, sexual orientation, disability, identity, marital status, political affiliation or union membership. The Supplier shall provide a meaningful grievance mechanism to allow employees and contractors to register confidential complaints about harassment, discrimination or abuse and shall provide a robust mechanism for fairly and quickly determining and remediating any such complaints.
- That working conditions are fair, with working hours not exceeding the local statutory maximum (or the guidelines set out by the International Labour Organization, whose guidance is here: [Working time and work organization \(ilo.org\)](#)).
- That compensation shall on no account fall below the applicable statutory minimum wage. Where practicable, Suppliers should aim to pay a living wage to its employees and contractors. On no account shall Suppliers withhold wages from employees, save for instances that are permitted by law, such as to repay advances or meet other lawful deductions.
- That Suppliers cooperate fully with Westlake to ensure that they do not supply any materials to Westlake that contain 'conflict minerals' (as defined in the US Dodd Frank Act, guidance on which is here: [SEC.gov | FACT SHEET](#)).
- That freedom of association and collective bargaining of all employees and contractors are respected in all places where such practices are permitted by law. Where they are forbidden by law, the Supplier shall provide informal mechanisms to ensure that workers' voices can be heard in a safe and organized way, which leads to meaningful engagement and resolution of disputes.

## Reporting

We encourage you to report known or suspected violations of these topics to:

<https://westlake.ethicspoint.com>

We appreciate your cooperation and assistance.

# Business Practices

Westlake is committed to the highest standards of business ethics and integrity. Suppliers are expected to conduct their business affairs in accordance with local, national and international law and to ensure that their actions are beyond ethical reproach. Suppliers shall ensure:

- That they, and any agents acting on their behalf, refrain from any kind of corrupt behavior, including bribery (defined as the giving or receiving of money or money's worth in return for obtaining or retaining a commercial advantage), money laundering or insider trading. In this regard, Suppliers shall be expected to apply the high standards found in the UK Bribery Act (which can be found here: [Bribery Act 2010 \(legislation.gov.uk\)](https://legislation.gov.uk/ukpga/2010/7)), whether or not they are subject to UK jurisdiction.
- That they, and any agents acting on their behalf, do not intentionally or inadvertently breach any international sanctions, trade embargoes or export controls imposed by the United States of America or any other country whose trade sanctions regime has been endorsed by the United Nations.
- That they, and any agents acting on their behalf, do not engage in activity that could violate any applicable competition law or anti-trust law.
- That they, and any agents acting on their behalf, do not offer or make gifts or provide in kind benefit to any Westlake employee or contractor where the value of that gift or benefit exceeds US\$50. (This prohibition shall not apply to legitimate and documented business expenses, such as reasonable meals or simple entertainment provided that Westlake business is discussed and the activity has a clear business purpose).
- That they, and any agents acting on their behalf, do not engage in any behavior which could reasonably be construed as creating any commercial conflict of interest involving Westlake.
- That they will always act with financial and commercial integrity, which shall include fair payment terms and lead times with their suppliers, payment of all due taxes and other lawful deductions, ensuring that their accounts are up to date and properly audited and ensuring that they can meet their financial obligations as they fall due.





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