BOROUGE INTERNATIONAL

# Global Code of Conduct 2026



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# Leadership Statement

At Borouge International, we are united by a bold vision: to shape a thriving global organization, that leads with integrity, responsibility, and respect. Our journey is one of continuous progress: transforming our operations to meet our customers' goals and implementing responsible business practices across our entire organization. We hold ourselves and those we do business with accountable to the highest standards, knowing that our actions today shape the world of tomorrow.

This Global Code of Conduct (the "Code") is more than a set of rules - it is a living reflection of how we treat each other, how we do business, and how we protect the people and places we impact. Whether you are working in an office, on a site, with customers, or behind the scenes — your choices matter. Our Code empowers us to speak up, ask questions, and seek advice whenever we face uncertainty. We encourage open conversations at all levels, knowing that honest feedback and different perspectives are the keys to innovation and our lasting success.

We know you will not find an answer to every situation here. But you will find clear principles, practical advice, and support when you need it. If something feels off, speak up. Whether you consult your leader, reach out to Ethics & Compliance, or use our confidential reporting channels like EthicsPoint, Takallam, or EQS Integrity Line. You can be confident that your voice matters and that you are protected from retaliation when you speak up in good faith.

Thank you for your dedication to these principles and for building an organization we are all proud to be a part of. By working together, we can shape a world that is better tomorrow than it is today.

# Upholding Our Code: Scope & Responsibilities

## Scope

Our Code applies to everyone who works for or with Borouge International, or represents our company—employees, contractors, suppliers, joint venture partners, agents, business partners—across all global operations, subsidiaries, and affiliates. We expect all individuals and organizations acting on our behalf to uphold our values and comply with all applicable laws and regulations. We require them to adhere to our Code or their own policies and procedures that meet or exceed our Code.

Our Code sets the minimum standard of conduct and provides practical guidance for everyday decisions. Where specific guidance is not available, we rely on common sense, good judgment, and our shared commitment to act with integrity. We encourage you to reach out to your Leader or the Ethics & Compliance. We encourage collaboration with business partners who share our values and expect them to cascade these standards throughout their own value chains.

## Our Shared Responsibilities

**Ethics & Compliance**
Ethics & Compliance creates, leads, and supports our comprehensive program, empowering a culture where ethical conduct is the norm. Ethics & Compliance is responsible for:

- Ensuring that everyone, especially leadership, is committed to lawful and ethical conduct;
- Assessing ethics and compliance risks and ensuring controls are in place to mitigate those risks;
- Providing guidance and advice to stakeholders on lawful and ethical behavior;
- Leading investigations into unlawful and unethical conduct;
- Ensuring inappropriate conduct is handled consistently and remediating any alleged violations of applicable laws or Borouge International policies.

**Everyone**
We are all personally accountable for doing what is right even when no one is watching. We are all responsible for:

- Fostering a culture of ethics and compliance;
- Committing to ethical conduct, accountability, and integrity in everything we do;
- Preventing unlawful or unethical behavior;
- Reading, understanding, and adhering to the Code and related policies;
- Following all applicable laws and regulations;
- Completing assigned training;
- Seeking advice when unsure about a course of action;
- Speaking up and reporting suspected violations or concerns, knowing there is no fear of retaliation for good faith reporting;
- Participating in investigations.

**Leaders**
Leaders carry an elevated duty to model ethical behavior, foster a culture of integrity, and ensure that their teams understand and uphold the principles of the Code. Leaders' actions set the tone for accountability, transparency, and trust across the organization. Leaders are responsible for:

- Supporting employee efforts to live our values and act according to the Code;
- Keeping an open-door policy and be willing to hear what people have to say;
- Assessing and mitigating risks;
- Supporting people who speak up by listening closely and taking their concerns seriously;
- Protecting employees who report concerns in good-faith;
- Fostering a culture in which employees feel protected from retaliation because they truly are.





# Our Values

Our core values support our vision and help guide our decision-making. They inspire us to act with integrity, collaborate across boundaries, innovate with purpose, and respect the breadth of our global community.

# Compliance with Applicable Laws

Complying with all applicable laws, regulations, and policies is fundamental to how we undertake our work within Borouge International. This is a critical element of ensuring that all our business is conducted properly.

Acting in violation of any applicable law can expose you and Borouge International to legal action. Where there is a difference between a legal requirement and the Code, we seek to apply the higher ethical standard, while always complying with the applicable law.

# Consequences for Non-Compliance

Those who breach the Code will face disciplinary action up to and including termination of employment or engagement without notice or payment in lieu of notice.

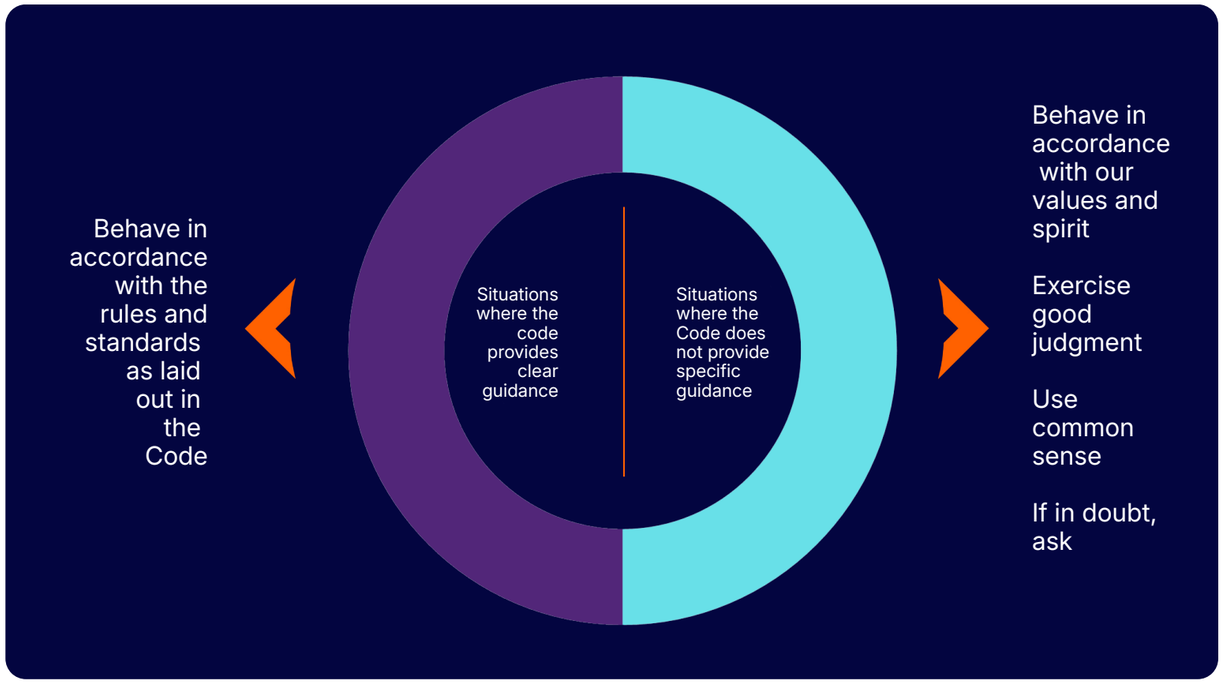
For business partners, we may request corrective actions, withhold funds, or terminate the relationship with you if you breach this Code or any requirements under applicable law.

# Making Ethical Decisions

Sometimes, the most ethical course of action may not be clear. When this happens, talk to your Leader, consult our Code, or contact Ethics & Compliance. You can also use these questions and the picture below to help guide you:

1. Is my action legal?
2. Is my action consistent with the Code?
3. Is my action right for Borouge International and consistent with Borouge International's values?
4. Would other people (including my leader, team, family, or the public) perceive my action to be ethical or the right thing to do?

If the answer to any of the questions above is "No" then you should seek further guidance from Ethics & Compliance before proceeding.






# We Foster a Safe and Healthy Workplace

Safety and health are non-negotiable. We aim to protect our people, the environment, our assets, and the communities in which we operate. We are guided by the principles of Responsible Care® aligning with our industry's efforts to advance health, safety, and environmental stewardship. We expect everyone to know and follow the policies, procedures, and codes of practice that apply to their work, and to act in full compliance at all times. Where local statutory health, safety, environment ("HSE") requirements exceed internal policies or voluntary frameworks, the stricter local requirements apply.

## Our Everyday Responsibilities

Each of us is responsible for preventing accidents, injuries, illnesses, environmental harm, and adverse community impacts in our daily work. This includes:

- Complying with all HSE policies, procedures, and legal requirements at our work locations;
- Identifying hazards and assessing risks, then implementing controls to reduce risks to an acceptable level;
- Immediately reporting any accident, injury, illness, incident, near hit, or unsafe condition when you become aware of it, and correcting unsafe conditions when safe to do so;
- Using applicable controls and personal protective equipment as required;
- Refraining from bringing weapons to the workplace, unless there is a legally protected right allowing the same. Absent such right, there is zero tolerance for weapons in the workplace;
- Stopping work and escalating concerns if conditions are unsafe;
- Knowing and following emergency procedures.

No activity is so important that it cannot be done safely. For more guidance please refer to our HSE Policy and associated standards and procedures.

## Substance Use & Smoke Free Workplaces

We provide a workplace that is free from the negative impacts of smoking, drugs, and alcohol. We adhere to the following practices:

- We only smoke in designated smoking areas and as permitted by local law;
- We do not work while impaired by alcohol, drugs, or any intoxicating substances—legal or illegal;
- We come to work fit for duty and disclose any medical conditions, medications, fatigue or illness that can affect safe performance;
- We do not possess, use, or transfer alcohol, drugs, or controlled substances on Borouge International property or while conducting company business.

Further guidance is provided in our Alcohol and Drug Policy.



# Workplace Conduct

We reach our potential through collaborative teamwork, respect, and care for one another. We foster a psychologically safe workplace where everyone has an equal opportunity to thrive—across differences in geographic location, culture, gender, race, sexual orientation and expression, age, religious beliefs, socioeconomic background, work experience, physical appearance, and other personal characteristics. Some of these characteristics are protected by law and some may not be, but our differences and unique perspectives contribute to a stronger Borouge International.

## Equal Opportunity

We are committed to equal opportunities for all and making fair employment decisions. We:

- Comply with all applicable anti-discrimination laws and pay equity laws;
- Provide reasonable accommodations for disabilities, religious beliefs, family status, and other protected characteristics consistent applicable with law;
- Make employment decisions on merit, job related criteria, and business needs.

## How We Treat Each Other

We build an inclusive culture by:

- Treating everyone respectfully and fairly;
- Working together as one team, embracing our differences;
- Communicating honestly and effectively;
- Keeping our commitments to one another;
- Acting ethically, responsibly, with integrity;
- Not discriminating - especially in recruitment, promotion, or discipline.

## We Foster a Respectful Workplace

Borouge International's workplace is grounded in respect. We do not engage in harassment and violence in the workplace. We keep workplaces and processes safe for employees, contractors, business partners, and external stakeholders.

Harassment is any behavior that creates an intimidating, hostile, or offensive work environment. We do not tolerate harassment of any kind—sexual, physical, or psychological—in any setting related to work (including virtual settings and company sponsored events).

Some examples of harassment that is inappropriate in the workplace include:

- Name-calling, slurs, harassing calls, or spreading rumors;
- Inappropriate gestures or comments intended to intimidate;
- Sexual comments or contact;
- Bullying (physical or psychological) that creates fear or mistrust, ridicules, or devalues a person (e.g., hostile jokes, innuendo, yelling);
- Creating, displaying, or circulating offensive content in print or electronic form (e.g., graffiti, cyberbullying).

## How We Build a Respectful Workplace

- Be mindful of how our actions and comments may be perceived by others;
- Remember that our behavior is judged by how a reasonable person would perceive it, not by our intent;
- Conduct ourselves professionally with colleagues, partners, and stakeholders—inside and outside the workplace;
- Adhere to accepted standards of professionally appropriate dress, sensitive to the cultural considerations for the regions in which we work;
- Recognize and report harassment, violence, or disrespectful conduct that happens to you or someone else.



# We Uphold Human Rights

We operate our business consistent with our human rights commitments and we:

### Fair Labor

Ensure all work is voluntary and that employees are free to leave employment after reasonable notice.

Do not use forced labor, modern slavery, bonded labor, or child labor in our operations and we hire others fairly and with consent.

Do not use physical abduction, imprisonment, kidnapping, trafficking, sale of workers, or involuntary prison labor.

### Child Labor

Only employ workers who meet the minimum legal age requirements and we do not employ people under 18 for hazardous work or in a manner that interferes with their education or development. We support legitimate apprenticeship programs that comply with applicable laws.

### Freedom of Association

Respect freedom of association and the right to collectively bargain, join labor organizations, seek representation where permitted by local law and we do not interfere with, or retaliate against, employees exercising these rights.

### Working Conditions and Working Hours

Provide a healthy and safe working environment, including safe drinking water, adequate lighting, proper temperature, ventilation, sanitation, and emergency preparedness. All facilities and housing conditions, if provided, must be constructed and maintained in accordance with the standards set by applicable laws and regulations.

Identify and mitigate workplace hazards, provide appropriate personal protective equipment, and ensure access to medical care.

Do not deprive workers of food, shelter, or other necessities of life.

Do not make threats against a worker or their family or threaten to exclude workers from community and social life or future employment opportunities.

Ensure workers are free to voluntarily terminate their employment upon reasonable notice.

Allow workers freedom of movement and refrain from physically confining workers to the workplace or related premises.

Meet or exceed all applicable employment and labor laws.

### Hiring

Use accredited recruitment agencies where available. We only use recruiters who do not engage in fraudulent or illegal practices and who do not charge workers a recruitment fee.

Provide workers with employment contracts, pay statements, and policies in a language they understand. We do not substitute a workers' written employment contract for a different document.

Do not hire workers who are born or descended into bonded or "slave" status.

Do not force workers to surrender their cell phones or identity documents (such as work visas, passports, birth certificates, etc.).

Provide clear information about wages, benefits, and working conditions.

Do not require workers to lodge deposits or bonds to work.

### Wages & Benefits

Provide employees with fair remuneration that supports a dignified standard of living in accordance with local laws and market practices. Pay at least the minimum wage, provide timely payment, and ensure adequate holidays, leave, and medical coverage as required by law.

Provide transparent pay statements outlining hours worked, rate of pay, and the calculation of legal deductions. We do not underpay wages or make illegal deductions from wages. We do not assess fraudulent or excessive charges for travel, health checks, or work documentation.

Pay wages directly to workers and not into accounts or checks in another's name.

Pay wages regularly and in legal tender.

Do not force workers to use our store or services. We do not practice induced indebtedness (ex. falsifying accounts, inflated prices, excessive interest charges, etc.).

Ensure overtime compensated at a premium rate. We do not use compulsory overtime or obligation to work as discipline.

### Grievance Procedure

Allow employees to express their concerns about working conditions or potentially unlawful practices without threats of reprisal or harassment.

Speak up if we see signs of forced labor or child labor or suspect any other human rights violations in our supply chain.

Further information about our human rights policies can be found in our Third Party Code of Conduct.






# Ethical Business Practices

We conduct our business with honesty, fairness, and transparency. This strengthens our reputation, supports long-term success, and aligns our operations to legal and moral standards.

## Avoiding Corruption, Bribery, Theft, and Other Unethical Activities

Our dedication to doing what is right means we actively prevent and reject any form of corruption across both private and public sectors. This includes bribery, kickbacks, facilitation payments, embezzlement, fraud, theft, and other improper payments and deceptive practices.

**Bribery**
Anything of value can be considered a bribe if it is offered, promised, provided, requested, or accepted to improperly influence a business-related decision or to secure an unfair advantage. Items of value can include:

- Cash or cash equivalents: cash, gift cards, vouchers, crypto, coupons, or other similar instruments;
- Gifts, hospitality & entertainment: meals, tickets, lodging, amenities;
- Travel or per diems: flights, hotels, conference fees, upgrades, or "study tours";
- Sponsorships: Corporate sponsorships or gifts in kind;
- Donations: Political contributions or charitable donations;
- Other: Favors, jobs/internships, or other benefits to family members or close associates.

**Facilitation Payments**
Sometimes public officials may demand an unofficial "facilitation payment" to expedite or secure the performance of a routine governmental action. In short, facilitation payments are those made simply to persuade a government official to do a job they are already obliged to do. Many countries consider it a crime to give gifts or similar benefits to public officials, even if not done with the intent to encourage or reward an improper performance of a duty. Borouge International does not allow facilitation payments of any kind.

**Kickbacks**
Kickbacks are typically payments, goods, or services that are given to someone in return for them providing a business favor or advantage (e.g. awarding a contract). We must avoid any activity that might lead to a kickback being made or accepted to by us individually or by Borouge International. We must also avoid conduct that might suggest that such payment will be made or accepted. When you are asked to make a payment on Borouge International's behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt that details the reason for the payment.

**Fraud**
Fraud is any intentional act or omission designed to deceive other people. It can also be a failure to act, such as intentionally failing to correct something you know is incorrect. Fraud often has personal financial gain, but it may not always be immediately evident. Some examples of fraud include: creating false documents, forging signatures, receiving payment for goods not received, and other similar conduct. Borouge International prohibits fraud of all kinds. Our Fraud Prevention Policy provides further guidance.

**Theft**
Theft includes stealing company or others' assets such as cash, equipment, inventory, technology, information. It can also include using work time for personal gain. Both are strictly prohibited and may result in disciplinary action and legal consequences. Even if a practice is common locally, it can still be illegal or against Borouge International policy. Please consult our Gifts, Entertainment, Anti-Bribery and Corruption Policy for more guidance about avoiding unethical business practices.

## We Responsibly Exchange Gifts, Entertainment, and Hospitality

In a global business environment, gestures like gifts, hospitality, and travel can help build goodwill and strengthen relationships. In some cases, they can be an important part of cultural etiquette. Despite this, they must always be handled with transparency, fairness, and respect for local laws and company policies. Borouge International has specific rules and procedures governing giving and receiving business courtesies with the relevant disclosure requirements. Consult the Gifts, Entertainment, Anti-Bribery & Corruption Policy when in doubt or contact Ethics & Compliance.

Reasonable and proportionate business courtesies may be appropriate when:

- They serve a legitimate business purpose;
- They are not lavish, secretive, or excessive;
- They do not create an obligation or expectation of favorable treatment;
- They comply with local laws and Borouge International policies;
- They would not cause embarrassment if publicly disclosed;
- There is no active procurement process;
- They are registered or pre-approved in accordance with Borouge International policies.

Refuse and report any request for a bribe, kickback, or facilitation payment. Additionally, cash or cash equivalents are never acceptable, except in extremely rare cases of customary practice—subject to Ethics & Compliance approval.

## We Take Extra Care When Engaging with Public Officials

We value transparency and accountability in all our interactions—especially when engaging with public officials. We recognize the importance of following clear and responsible practices. To ensure compliance you must obtain prior written approval from Ethics & Compliance before offering or providing anything of value to a public official. Many jurisdictions have strict regulations around such gestures, and we are committed to honoring them with integrity. Please refer to the Government Engagement & Political Activity section below and our Gifts, Entertainment, Anti-Bribery and Corruption Policy for further guidance about working with governments. Please be aware that Borouge International employees may also be considered to be public officials under certain laws. Employees should inform business partners that they may be considered government officials and must confirm that the giving or receiving of anything is in accordance with the business partner's policies and local laws.

## Avoiding Market Misconduct: Insider Management & Share Dealing

Borouge International personnel must comply with all applicable market abuse regulations and are strictly prohibited from engaging in insider dealing (insider trading), unlawful disclosure of inside information, or market manipulation. All inside information must be handled on a strict "need-to-know" basis and kept confidential until publicly disclosed. Insiders and their connected persons must obtain prior written clearance from the Insider Management Committee before trading in Borouge International securities and are subject to additional restrictions during closed periods.

Violations of these requirements may result in severe civil and criminal penalties for both the individual and Borouge International. Borouge International maintains a zero-tolerance approach to market abuse. If you have questions or concerns about potential violations you should contact Ethics & Compliance immediately. For more information, read our Insider Management Policy.



## We Maintain Accurate Data, Books, Records & Controls

We keep complete, accurate, and timely records of all transactions, expenses, and approvals.

**Our Responsibilities**

- Do not create false or misleading documents or use side letters;
- Follow all Borouge International financial controls, and finance and expense policies;
- Ensure all data is complete and accurate. This includes all sales figures, business partner information, costs, and other data sources;
- Report any suspected tampering or unauthorized access.

## We Have Zero Tolerance for Money Laundering and Terrorism Financing

We do not allow Borouge International to be used for illegal purposes. Money laundering is the process of concealing the origin of funds obtained through criminal activity so they appear legitimate. It can also include financing terrorism or other unlawful acts. These activities are crimes in nearly every country where Borouge International operates—and they carry severe penalties for both individuals and companies. Borouge International is committed to ensuring that its operations do not inadvertently facilitate money laundering or terrorist financing.

## How We Combat Money Laundering and Terrorism Financing

- We must know and verify the identity of the people and organizations we do business with;
- We conduct risk-based due diligence on customers, suppliers, agents, distributors, and other third parties;
- We ensure that the origin of money and property we receive or procure is legitimate;
- We remain alert to unusual or irregular payment methods, structures, or behaviors;
- We do not adopt any payment method that could be considered suspicious or nontransparent.

## Red Flags of Unethical Business Practices

Recognizing the warning signs of unethical and potentially illegal practices is essential for maintaining integrity and compliance. Being alert to red flags can help prevent legal risks and reputational damage. The following list outlines some common indicators of unethical behavior of which everyone should be aware. Further guidance can be found in our Gifts, Entertainment, Anti-Bribery and Corruption Policy and Fraud Prevention Policy.

- Requests for cash payments, gift cards, third-party payments, or payments to offshore accounts unrelated to the transaction;
- Overpayments, round sum invoices, or unexplained credits/debits;
- Business partners who refuse to provide identification, ownership details, or financial information;
- Transactions that lack a clear business purpose or involve complex structures without justification;
- Requests to split invoices, misdescribe goods/services, or avoid documentation;
- Vague "consultancy," "success fee," or "marketing" services with no clear scope;
- Excessive commissions or unusual discounts;
- Gifts or hospitality tied to a pending decision, bid, or inspection;
- Requests to backdate, split, or misdescribe transactions.

## Avoiding Conflicts of Interest

When we make decisions for Borouge International we ensure that we do not seek to personally benefit. Our decisions are made in the company's best interests—free from personal bias or undue influence.

We understand that a conflict of interest can occur when personal, social, financial, or other outside interests could interfere with—or appear to interfere with— our ability to act in Borouge International's best interests. We recognize that even the appearance of a conflict can damage trust and our reputation. We never use Borouge International to advance personal interests or to benefit friends or family.

### Common Sources of Conflicts of Interest

A conflict of interest may arise from:

- Employment, financial, business, or social activities outside Borouge International;
- Business or financial ties to Borouge International stakeholders (customers, suppliers, distributors, agents, contractors, consultants, JV partners);
- Personal relationships, including family members (close relatives) and close personal relationships (e.g., significant others, close friends).

### Our Responsibilities

- Understand Borouge International's Conflicts of Interest Policy and disclosure requirements—ask questions if unclear;
- Avoid activities that create, or appear to create, a conflict between personal interests and Borouge International's interests;
- Disclose any actual, potential, or perceived conflicts to protect yourself and Borouge International;
- Follow any restrictions or mitigations imposed after a disclosure (e.g., recusal, divestment, change of duties).

### Procurement-Specific Safeguards

- Decisions must be objective—based on quality, price, capability, service, and compliance with Borouge International policies and internal procedures;
- You must not participate in any tender, auction, sourcing event, or approval where a family member, close personal relation, or personally connected company is involved;
- If such a situation arises, immediately declare the conflict in writing and refrain from direct and indirect involvement (no access to documents, no evaluation, no approvals).



## We Compete Fairly in the Marketplace

The primary goal of Competition Law is to create and preserve a level playing field in the market. Borouge International is committed to competition on the merits driven by innovation, efficiency, and quality. Competition Law prohibits agreements and practical cooperation including exchange of commercially sensitive information between companies that have as their object or effect the distortion of fair competition. We refrain from engaging in prohibited practices such as cartels, unlawful exchanges of sensitive information, or the abuse of a dominant market position.

Before any interaction, we apply the following self-assessment:

- Does this interaction restrict Borouge International's or the other party's ability to make independent commercial decisions on key parameters (such as price, volume, or strategy)?
- Does it reduce strategic uncertainty regarding our market behavior?

If the answer is yes then we do not engage in the conduct. If in doubt, we immediately seek guidance from Ethics & Compliance.

We fully apply relevant merger control laws in all stages of our transactions. We do not consummate any transaction requiring prior clearance before such clearance is obtained.

### Our Responsibilities

- Conduct business in full compliance with applicable laws;
- Before engaging in any conduct that may carry competition law risks, perform the self-assessment test on page 14 and when in doubt consult Ethics & Compliance for further guidance;
- Never enter into formal contracts, informal "gentlemen's agreements," or any form of mutual understanding to:
  - set prices or price components (surcharges or discounts);
  - collectively refuse to deal with specific suppliers or customers (boycotts);
  - allocation of market or customers;
  - restrict technical development or production volumes;
  - coordinate bids ("bid rigging") or decline to bid to favor another party.
- Never discuss or exchange commercially sensitive information with actual or potential competitors such as:
  - current or future pricing (including discounts, formulas, and timing of changes), negotiation strategies, and contract terms,
  - production capacities, turnaround schedules, inventory levels, supply shortages, and logistical details,
  - strategic projects, R&D plans, investments, and forecasts regarding demand, sales, or costs,
  - individual customer details,
  - any other information influencing commercial strategy, including past or publicly available data if it allows for the deduction of a competitor's future behavior or specific strategies.
- Avoid anti-competitive behavior such as wage-fixing, dividing markets, carving up geographical markets, misusing our market power, or any conduct that could be seen as manipulating the market.
- Ensure that before implementing or accepting obligations entailing vertical restraints are approved by Ethics & Compliance.
- Do not engage in any conduct that constitutes an abuse of a dominant or relative market position, ensuring full compliance with all applicable competition laws.
- Do not use vague or ambiguous language in emails or notes that could be misinterpreted as anti-competitive intent.
- Contact Ethics & Compliance immediately when considering a merger, acquisition, or joint venture to ensure all competition law and notification requirements are met.
- Complete all assigned competition law and antitrust training sessions to ensure knowledge of applicable laws and internal policies remains current.
- Only refuse to deal with a customer/supplier, if there are objective grounds for the refusal. Do not make the sales of our product or discounts dependent on the customer buying another product or service.
- Do not charge prices below costs to drive a competitor out of the market.
- Never require a distributor to adhere to certain selling prices or to profit margins.
- Do not prevent or discourage a distributor or customer from reselling our products into certain territories or to certain customer without pre-approval.

Additional guidance on this important topic can be found in our Competition (Antitrust) Law Policy. You can also reach out to Ethics & Compliance for further guidance.

# We Comply with Trade and Immigration Laws

We operate across borders with integrity and full compliance. International trade is governed by complex and evolving laws that regulate the movement of goods, services, software, technology, and technical information. Many jurisdictions also impose sanctions, embargoes, and restricted party rules. Complying with applicable requirements is fundamental to how we do business.

**Our Commitments**

- We comply with all applicable international and domestic trade laws, including import/export controls, customs requirements, and sanctions;
- We take all appropriate actions to ensure our cross-border activities are lawful, transparent, and well-controlled;
- We extend our commitment to applicable sanctions compliance to our business partners through contractual obligations and oversight.

**Our Responsibilities**

- Know the transaction: Understand who we are dealing with, what we are transferring, where it is going, how it will be used, and who will use it;
- Restricted party & sanctions screening: Do not transact with sanctioned countries, entities, or individuals. Screen and rescreen partners as required;
- Classification & licensing: Determine export classifications, assess license needs, and obtain approvals before transfer or shipment;
- Customs compliance: Ensure accurate valuation, classification, country of origin, and documentation. Never misdescribe goods, under invoice, or split shipments to evade controls;
- Accuracy & transparency: Provide complete, accurate, and truthful information in all filings, declarations, and certifications;
- Only use approved brokers and forwarders and internal processes for classification, licensing, and filings.

Follow the Sanctions and Export Controls Policy and consult Ethics & Compliance or Trade Compliance whenever questions arise. Do not proceed until you have guidance.

## Working Across Borders - Immigration Compliance

Immigration laws apply whenever we perform work across borders. Before you travel for work or engage individuals to work in a country other than their home country:

- Ensure all required visas and work permits are in place before travel or work begins;
- Do not perform work on tourist or other nonwork visas;
- Contact the Ethics & Compliance (or designated immigration contact) to confirm requirements and obtain approvals;
- Ensure third-party workers on Borouge International assignments have valid work authorization.





# We Protect our Intellectual Property, Information, and Assets

Our ideas, innovations, and information are the foundation of our success. Whether it is a patented process, a confidential strategy, or a customer insight, we treat all intellectual property and business-critical data with the care it deserves.

## Intellectual Property: Respecting and Protecting Innovation

Intellectual property (IP) includes everything from copyrighted materials, trademarks, patents, trade secrets, and technical know-how. If you create it while working at Borouge International, it belongs to the company and it is our shared responsibility to protect it.

We also respect the IP of others. Using third-party content without proper authorization can have serious legal consequences. Always follow the rules, licenses, and agreements that govern how we use external IP. When partners share their IP with us, we use it only as agreed.

## Confidentiality: Keeping Sensitive Information Secure

Confidential information must be handled with care. If it is not public, treat it as private. Share it only with those who need to know, and only in line with company policy and legal requirements.

Examples of confidential information include:

- Business strategies, financial models, marketing or sales forecasts;
- Customer data and pricing terms;
- Supplier data and pricing;
- Research, technical specs, and internal communications;
- Employee records and information.

Never disclose confidential information outside of Borouge International without proper authorization and a signed confidentiality agreement. This applies even after you leave the company.

## Responsible Use of Company Resources

From laptops and lab equipment to software and vehicles, Borouge International provides the tools you need to do your best work. Use them responsibly and primarily for business purposes. Occasional personal use is okay—if it is minimal and does not interfere with your work.

Our assets include:

- Physical: Offices, equipment, vehicles
- Financial: Cash, investments, records
- Digital: Emails, files, systems
- Intellectual: Patents, trade secrets, proprietary data

Never use company assets for personal gain or outside business interests. Misuse may lead to disciplinary action, including termination of employment or engagement without notice.

Our IT systems are essential to how we operate. Follow all cybersecurity policies, and be alert to threats like phishing, malware, and unauthorized access.

- Do not share passwords or open suspicious links;
- Keep your devices secure and report any loss or theft;
- Use company email and systems professionally and in line with policy.

Remember: your activity on company systems may be monitored. Treat every message and file as if it could be reviewed later.

Time is one of our most valuable resources. Use your work hours to deliver value and not for side projects or personal errands. Honor your commitments and stay focused on your responsibilities.

# We Work with Ethical Third Parties

We can sometimes be held accountable for the actions of agents, intermediaries, distributors, consultants, joint venture partners, customs brokers, and other intermediaries acting for or representing Borouge International.

We believe that ethical business practices extend beyond our own operations—they must be embedded throughout our entire value chain. That's why we partner with suppliers who share our values.

### Our Approach

We ensure we have an ethical supply chain, we:

- Conduct risk based due diligence before engagement and refresh this periodically;
- Review and document supplier performance to ensure alignment with our standards;
- Pay only for bona fide services at market-based rates; require clear scope and verifiable deliverables;
- Do not receive or make cash payments (other than minimal, policy approved petty cash with receipts); avoid untraceable or offshore payments lacking a legitimate business rationale;
- Monitor performance, invoices, and expenses; reject vague or inflated bills.

### Our Expectations

- Suppliers must operate in accordance with our Code and our Third-Party Code of Conduct;
- All sourcing decisions are made fairly, transparently, and based on merit;
- Suppliers who fail to meet our standards, at a minimum, risk having their contract cancelled

### Your Role

- Follow all due diligence protocols when evaluating or onboarding suppliers;
- Ensure supplier assessments are properly documented and retained;
- Work with Procurement to confirm suppliers understand and comply with our Code.

By managing our supply chain with integrity, we not only protect our business—we help raise the bar for responsible practices across industries and borders. Consult the Business Partner Due Diligence Policy for additional guidance.

### Our Responsibilities

- Ensure all contracts receive legal review before signing;
- Follow internal approval procedures for contracts and expenditures;
- Only sign contracts or approve spending if you have been granted the appropriate authority;
- Understand the implications of what you are signing as some agreements may carry risks that require elevated approval levels.





# Responsible Business Communications

What we say matters. Our reputation is shaped not only by what we do but also by what we communicate—verbally, in writing, and especially online. Every message, whether internal or external, reflects on our company and our values of integrity, respect, and openness.

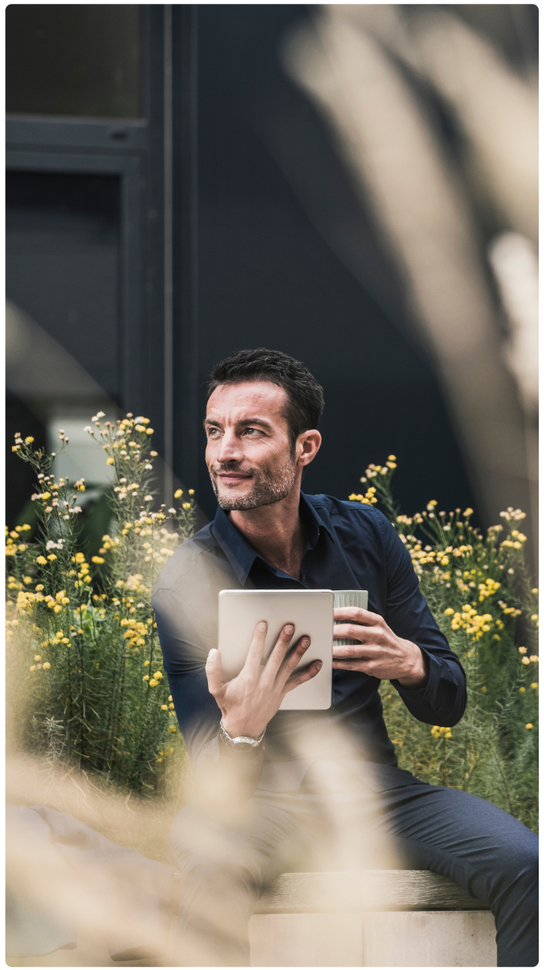
### Our Core Principles

- All business communications must be accurate, professional, and aligned with Borouge International's values;
- In today's world, even private messages can become public. We treat every communication as if it could appear on the front page of a newspaper;
- Only authorized spokespersons may comment externally on Borouge International's behalf, including to the media, on social media, or to government officials;
- If you receive an external inquiry, do not respond directly. Refer it to Communications immediately.

### Our Responsibilities

- Use care in all business communications—memos, letters, emails, calls, social media, instant messaging, documents, presentations, and conversations;
- Be factual and relevant; avoid exaggeration or speculation;
- Never disclose sensitive information without authorization;
- Think carefully before posting or commenting online;
- Avoid sharing confidential information or making statements that could harm Borouge International's reputation;
- If you reference your connection to Borouge International, ensure your views are clearly distinguished as personal and not Borouge International's views;
- Never post any offensive, derogatory, or other inappropriate material;
- Follow Borouge International's Communications Policy and seek guidance when in doubt,

Remember: Every message counts. Communicate with clarity, professionalism, and integrity—because we are judged by what we say as much as by what we do.



# Government Engagement and Political Activity

Working with governments requires the highest standards of integrity, accuracy, and compliance. Rules that may be acceptable in commercial settings can be unacceptable or illegal in the public sector, and they vary by country. We follow all applicable laws and regulations, including public procurement rules, lobbying and transparency requirements, and communication protocols. We act transparently and with care in all government interactions.

**Our Core Principles**

- Borouge International speaks with one voice. Public policy positions and government outreach occur only through authorized channels and designated spokespeople;
- Borouge International does not support political parties. Corporate donations to political parties, candidates, or electoral committees are prohibited, as are donations to organizations inconsistent with our Code;
- We respect government bidding requirements and processes and avoid any conduct that could be perceived as improper influence;
- Only authorized representatives of Borouge International may engage in lobbying or policy advocacy on behalf of Borouge International;
- Third party lobbyists or consultants must undergo due diligence and be pre-approved in writing by Government Affairs and senior leadership in accordance with Borouge International policy. Certain jurisdictions like Canada have lobbying registration requirements. Consult the applicable Lobbying Policy for more information or contact Ethics & Compliance;
- All information, representations, certifications, bids, and filings submitted to government officials and agencies must be complete, accurate, and not misleading;
- Social investment (example infrastructure investments at the request of government) is made only after proper due diligence and approvals).

## Gifts & Entertainments to Government Officials

Offering any gift, hospitality, travel, or other courtesy to Government Officials (as defined in our Gifts, Entertainment, Anti-Bribery and Corruption Policy) is high-risk and often restricted or prohibited in many jurisdictions.

- Exercise particular care and seek preapproval from Ethics & Compliance before offering or providing anything of value to a government official;
- When in doubt, do not proceed until you receive written guidance from Ethics & Compliance.

**Our Responsibilities**

- Comply with all laws regulating government interactions;
- Submit accurate information and maintain complete, truthful records for any government related activity;
- Use authorized channels for communications with government officials or agencies. Do not speak on Borouge International's behalf unless designated;
- Preclear business courtesies to government officials with your Leader and Ethics & Compliance;
- Report immediately any external investigation, audit, or unusual data request to your Leader and Ethics & Compliance or Legal. Do not respond independently without guidance;
- Do not make political donations or indirect contributions (e.g., through intermediaries) on Borouge International's behalf;
- Engage only approved lobbyists/consultants who have completed due diligence and have formal Borouge International approval.

## Personal Political Activity

Borouge International respects your right to participate in personal civic and political activities in compliance with law. However:

- Make it clear your views are your own, not Borouge International's;
- Do not use company time, funds, brands, assets, email, or facilities for personal political activity;
- Never make political contributions on behalf of Borouge International or in a way that could be perceived as Borouge International support;
- If there is any question about advocacy, affiliations, or potential conflicts, seek prior guidance from Government Affairs and Ethics & Compliance.



# Privacy and Data Protection

We respect the personal information entrusted to us. We comply with applicable privacy and data protection laws wherever we operate and apply industry standards to protect personal information throughout its lifecycle.

**What We Mean by "Personal Information"**
Personal information (or personal data) is any information that identifies, or can reasonably be used to identify, a person. This can include—directly or indirectly—details such as name and contact information, demographic and health data, and employment information.

Some examples of personal information include:

- Payroll and employment data: wage and benefit information; forms relating to benefits; performance and role information
- Identifiers and financial data: social insurance/social security numbers, national IDs, tax IDs, and banking information
- Contact details: phone numbers, personal or work email addresses, emergency contact information (e.g., spouse, significant other, or family member details)
- Demographics and HR records: age, gender, family status, and other similar information

**Our Responsibilities**
Every one of us plays a role in protecting personal information. We must:

- Follow and understand the laws and Borouge International policies on information security, records management, acceptable use, data handling, data destruction, and data retention
- Collect, use, and disclose personal information only for legitimate business purposes and only with proper authorization
- Limit access to personal information to only those with a need-to-know and sharing only the minimum necessary
- Never store, transmit, or export personal information in ways that violate local data residency or cross-border data transfer requirements
- Immediately report any suspected unauthorized access, loss, or disclosure of personal information

Further guidance about our information handling practices can be found in our Privacy Notice. Reports about improper collection, use, or disclosure of personal information can be directed to the Borouge International Data Protection Office or your local Data Protection Officer (sometimes called a Privacy Officer).





# Getting Help

Borouge International's reputation is built on integrity. We earn and keep the trust of our customers, partners, and communities by complying with the law and living our values. Everyone connected to Borouge International plays a vital role in identifying and preventing misconduct.

We encourage everyone to speak up and report concerns in good faith. We provide confidential channels for reporting and protect against retaliation. We investigate issues thoroughly and take appropriate action to uphold our standards.

## When to Speak Up

You should speak up anytime you believe that this Code, our policies, or the law is not being followed. Report concerns or questions, especially those related to:

- Anti-corruption and bribery
- Competition/antitrust
- Insider trading and securities laws
- Sanctions and trade compliance
- Corporate tax regulations
- Privacy and data protection
- Human Rights
- Fraud
- Privacy Workplace Safety
- Environmental protection
- Harassment and violence
- Product safety and consumer protection
- Any other Code matters or policy violations

Failing to report a known violation is itself a breach of the Code.

**How to Report**
Choose the channel you are most comfortable with:
1. Your Leader
2. Ethics & Compliance
3. Borouge International Ethics Hotline(s)
4. Human Resources

The Borouge International Ethics Hotline(s) are available to Borouge International Personnel and external stakeholders to raise concerns securely, confidentially, and—if you choose—anonymously. The platforms support confidential handling on a strict need to know basis. If you report anonymously, you may receive a tracking ID to follow up, provide more information, or receive updates.

While we work toward an integrated entity, employees should continue to report any Ethics & Compliance using the reporting tools and processes already in place within their legacy organization as follows:

**NOVA Chemicals: EthicsPoint or email Ethics & Compliance**
**Borealis: EQS Integrity Line or email Ethics & Compliance**
**Borouge: Takallam or email Ethics & Compliance**

Employees who are employed directly with Borouge Group International AG should report matters into the Borealis EQS system during this transition.

### What Happens After You Report

- We review all reports promptly, following internal processes and applicable laws.
- We protect your identity and limit information sharing strictly to those with a legitimate need to know.
- We safeguard the rights and dignity of everyone involved throughout the process.
- Unless you are directly impacted (ex. complainant in a harassment case) we do not keep you informed on the status or outcome of the case.

### Protection from Retaliation

When you raise a concern in good faith or you participate in an investigation you are protected from retaliation. Retaliation is any unfair work-related consequences. It can occur in many different forms such as: dismissal, demotion, unwarranted denial of promotion or training, reduced pay, negative performance appraisal, or other similar measures. Sometimes retaliation is obvious and sometimes it is more subtle.

If you experience retaliation, please report it immediately. Individuals who engage in retaliatory conduct will face disciplinary action, up to and including termination of employment or engagement for cause.

Bad faith reports are not tolerated and may also result in disciplinary action up to and including termination of employment or engagement for cause.

### Your Responsibilities

- Raise concerns in good faith.
- Cooperate with investigations to help resolve matters quickly and properly.
- Respect confidentiality. Do not share investigation details unless directed.

## Expectations for Business Partners

Borouge International expects business partners to maintain an accessible and effective grievance mechanism (as permitted by law) for their workers and stakeholders to report concerns about human rights, environmental standards, and other Code-related matters, with no retaliation. Upon request, partners should provide information (e.g., the number and nature of grievances, as permitted by law) to Borouge International.

## For More Information and Learning

Our Code highlights the key features of our global Ethics & Compliance program; however, we have many other policies and procedures that provide guidance on these important topics.

While we integrate into a unified Borouge International, there may be overlap between Borouge International -level policies and legacy NOVA, Borouge, and Borealis policies. In the event of any conflict, the stricter standard between your legacy entity policy and the Borouge International -level policy will apply. If you have questions or concerns about any policy conflicts you should seek guidance from a Leader or Ethics & Compliance.
Please consult with the following policies for additional information:

**Borouge International Ethics & Compliance Policies:**

- Anti-Bribery and Corruption Policy
- Competition Law Policy
- Conflicts of Interest Policy
- Data Privacy and Protection Policyons
- Insider Management Policy
- International Sanctions & Export Controls Policy
- Supplier Code of Conduct

The most recent version of Borouge International policies can be found here: Borouge International Policies

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**Borealis Legacy Policies:**

- Compliance Management
- Ethics & Integrity Policy
- Code of Business Ethics
- Code of Conduct
- Whistleblowing Manual
- Issuer Compliance Instruction
- Business Partner Due Diligence Instruction
- Social Compliance Framework
- Data Protection Processes
- Regulatory Compliance Framework
- Competition Law Instruction

The most recent version of Borealis legacy policies can be found on Policies page on Compliance Management

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**Borouge Legacy Policies:**

- Code of Conduct
- Third Party Code of Conduct
- Inside Information & Insider Dealing
- Conflict of Interest Policy
- Sanctions & Export Control Policy
- Anti-Bribery & Corruption Policy
- Competition Law
- Personal Data Protection Policy
- Integrity Due Diligence Policy
- Fraud Risk Management Framework
- Whistleblowing Policy
- Compliance Framework
- Gifts & Entertainment Policy
- Sanctions & Insulation Protocols

The most recent version of Borouge legacy policies can be found on Policies page on Pages - Approved Document Management System (ADMS)

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**NOVA Legacy Policies:**

- Anti-Bribery and Corruption Policy
- Anti-Modern Slavery
- Antitrust (Competition) Policy
- Business Conduct Policy (Our Code of Conduct)
- Business Partner Due Diligence Policy
- Code of Ethics for CEO and Senior Financial Officers
- Conflicts of Interest Policy
- Fraud Prevention Policy
- Insider Trading Policy
- Lobbying Policy
- Policy Development and Management Policy
- Privacy Policy
- Records Management Policy
- Related Party Transaction Policy
- Respectful Workplace Policy
- Supplier Code of Conduct
- Responsible Business Communications Policy
- Trademark Usage Policy
- Trade Restriction Policy

The most recent version of NOVA legacy policies can be found on Policies page on ChemCentral


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