



**Occidental Chemical Corporation**  
A subsidiary of Occidental Petroleum Corporation

## SUPPLIER CODE OF CONDUCT

Occidental Chemical Corporation, together with its wholly-owned subsidiaries (collectively, “OxyChem”), expects its suppliers to uphold high standards and to operate in accordance with all applicable laws and regulations, as well as in accordance with the standards set forth in this Supplier Code of Conduct.

**Health, Environment and Safety:** Protecting the health and safety of OxyChem’s employees and contractors and protecting the environment are among OxyChem’s highest priorities. These objectives are considered in every aspect of OxyChem’s operations. Accordingly, OxyChem expects its suppliers to comply with applicable laws, regulations, policies and procedures regarding health, safety, process risk management, and environmental protection.

While on OxyChem’s premises, all suppliers must abide by all applicable safety regulations and OxyChem’s safety procedures and practices, take the necessary precautions to protect themselves, their co-workers, and all other persons on the premises, and immediately report accidents and unsafe practices or conditions to OxyChem.

As a proud member of the American Chemistry Council, OxyChem adheres to the Responsible Care® Guiding Principles. We expect our suppliers to adhere to these same principles, as well as internationally recognized environmental, social and corporate governance standards. The Responsible Care® Guiding Principles drive member companies to focus on improving the environmental, health, safety and security performance of facilities, processes and products throughout their life cycles. Suppliers are expected to accept these principles or develop similar programs to support their own operations.

**Sustainability:** OxyChem is committed to making a positive social impact - today and for future generations - through development and sustainable manufacturing of indispensable chemicals used in a broad range of life-enhancing products. Suppliers are expected to work with the highest integrity, in a culture of compliance and with respect for the communities where we live and operate, and implement programs aimed at reducing their environmental footprint. In addition, suppliers should implement procedures to track achievements in the reduction of greenhouse emissions, management of water use, improved energy efficiency and waste reduction.

**Human Rights and Respect for People:** OxyChem expects suppliers to share its commitment to being attentive to concerns raised by stakeholders. This includes respecting the needs of the communities in which it operates and working with stakeholders to support human rights within the areas of OxyChem’s activity and influence. OxyChem expects suppliers to support the rights and freedoms that have been universally recognized in international as well as national law and that are described in the declarations and principles listed in our [Code of Business Conduct](#) and [Human Rights Policy](#). These rights include, among other rights and freedoms, the right to a safe work environment, the right not to be discriminated against or harassed on the basis of race or religion, as well as the right to a workplace free of child labor and slave labor.



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**Highest Ethical Behavior; Gifts and Entertainment:** OxyChem is committed to conducting its business affairs in accordance with the highest ethical standards and in compliance with all applicable anti-corruption laws and regulations. It is expected that suppliers will not engage in any form of bribery to secure or retain business and will act in accordance with all laws related to bribery and conflicts of interest, including the Foreign Corrupt Practices Act (FCPA) of the United States, the UK Bribery Act (UKBA) and any other applicable anti-corruption laws. Under no circumstances should any gift or entertainment ever be offered, given, or provided to any OxyChem employee or contractor, or any immediate family member of an OxyChem employee or contractor, unless such gift or entertainment is not excessive in value and is consistent with customary business practices.

**Audit:** OxyChem may audit suppliers or otherwise objectively verify that suppliers are in compliance with this Supplier Code of Conduct.