

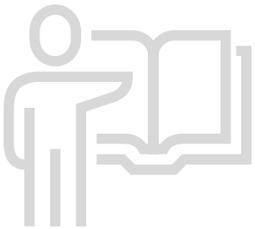


# Supplier Code of Conduct

*Lubrizol*



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## Shared Values – Collaboration for a sustainable future

At Lubrizol we believe that creating a positive impact requires that we hold ourselves to the highest standards of conduct. Our commitment to ethical and responsible operations is embedded across all aspects of our business, including our supply chain. Responsible Citizenship is a sustainability priority for Lubrizol and it shows up in what we expect from our supply chain partners. Lubrizol is committed to respecting human rights in the workplace, reducing our environmental impact, conducting business with integrity, compliance with all laws and remaining vigilant about cyber threats. We expect the same commitment from our suppliers. As a Lubrizol supplier, you are an important partner and how you conduct your business can impact Lubrizol in many ways. Creating shared success means upholding shared values.

This Supplier Code of Conduct outlines the principles that we require our suppliers to follow in their work for Lubrizol and to implement through their supply chains. Compliance with this Code will be an important factor in our decision to do business with you. By upholding our shared values and collaborating on this journey we can help each other create a more sustainable future for all.

A handwritten signature in black ink that reads "James T. Jones". The signature is written in a cursive, flowing style.

JT Jones  
Sr. Vice President, Emerging Markets and Procurement  
Chief Procurement Officer



## People, human rights and labor

At Lubrizol, we believe in the importance of ensuring that everyone has a safe, respectful, and inclusive place to work. As our supplier, you are required to share our commitment to people and to respect the human rights of your workforce.



### **Respectful Workplace**

You will provide a workplace that treats every person with dignity and respect, free of harassment, and where equal opportunities are provided for qualified individuals without regard to race, color, religion, sex, gender identity, national origin, genetic information, citizenship or social or economic status.

### **No Child or Forced Labor**

You will reject and actively combat all forms of child and forced labor. Do not directly or indirectly use child labor of any kind or forced labor (including, but not limited to, debt bondage, modern slavery, withholding of documents) or materials or services produced using such labor.

### **No Human Trafficking**

You will prohibit any form of human trafficking, including, but not limited to, use of force, fraud or coercion to obtain labor services, procuring commercial sex acts, destroying or concealing a person's identity, using misleading or fraudulent practices to recruit employees, charging recruitment fees or failing to provide return transportation to employees recruited from foreign countries. Do not procure materials or services that use such practices.



### **Fair Wages and Working Hours**

You will comply with laws related to wages and hours of work, and you will ensure that full-time workers are paid a living wage. In the absence of applicable laws or regulations, you will provide employees with sufficient opportunity for days of rest to ensure the safety of employees and their quality of health.

### **Freedom of Association and Collective Bargaining**

You will respect workers' lawful rights to associate, or not associate, with others to form and/or join an organization of their choice and bargain collectively in accordance with applicable laws.

### **Safety and Wellbeing**

You will provide a work environment that ensures the safety of your workers and the quality of their health. You will provide appropriate personal protective equipment and implement training and other health and safety programs to prevent accidents and catastrophic events. You will provide reasonable access to potable drinking water and sanitary facilities, adequate lighting and ventilation, fire safety, emergency preparedness, industrial hygiene, and machine safeguarding. Meet appropriate legal standards for canteen, cafeteria, or dormitory facilities. You also will provide necessary medical treatment and facilitate employees' return to work.



### **Respect Employee Privacy**

You will comply with all applicable laws, regulations, and standards regarding privacy of personal information, including the European Union's General Data Protection Regulation. Protect all such information from misuse by storing processing and transmitting such information in a manner consistent with all data privacy and information security laws.

### **Security Services**

You will ensure that any security services that are engaged at your facilities or in connection with your operations comply with applicable laws.

### **Reporting and No Retaliation Policy**

You will provide a reporting mechanism or process that allows workers to speak up with questions or concerns, and that tracks reports of incidents and corresponding corrective action plans to mitigate risks. You also will prohibit retaliation against any person who makes a report in good faith or participates in an investigation.



## Environment

At Lubrizol, we are committed to understanding the potential impact of our operations and products on the environment, especially our global corporate carbon footprint. As a Lubrizol supplier, you are a key partner in Lubrizol achieving its environmental goals and effectively addressing its environmental impact.



You commit to understanding the impact of your operations and products on the environment and to taking action to address those impacts in at least the following ways:

### **Respect for the Environment**

You will comply with all applicable environmental laws, regulations and directives regarding waste, air emissions, hazardous materials and wastewater discharge in the manufacture, transportation, storage, disposal of materials and products.

### **Responsible Consumption**

You will strive to use resources, especially natural resources, efficiently and responsibly. This includes the adoption of practices and technology to reduce waste and emissions and to measure the environmental impact of your operations. It also includes setting and meeting goals to reduce your carbon footprint (Scopes 1 & 2), waste to landfill and water usage in water stressed areas.



### **Bio-based and Renewable Materials**

You will source biobased and renewable materials responsibly by ensuring that materials were sustainably cultivated and responsibly harvested. You will avoid procurement of materials that can result in widespread deforestation or interruption of biodiversity in vulnerable locations and source third party certified materials where available.

### **Quality and Safety of Products**

You will maintain a quality assurance system and ensure that required permits, licenses and registrations are documented, available and current. Upon request, you will provide all requested product information including but not limited to composition and shelf life, safety data sheets, processing instructions and labeling instructions.

### **Provide Data and Information**

Upon request, you will be able to provide accurate and complete data and/or information regarding your environmental performance or impact of your operation and products. You will promptly respond to our requests for data and collaborate in validating data from secondary sources when primary data or information is not readily available.



## Business integrity

At Lubrizol, we demand that business decisions and actions be aligned with our values. As our supplier, you are required to share our commitment to conducting business with integrity.



### **Conflicts of Interest**

You will ensure that any business dealings with Lubrizol are based on objective commercial factors and are not compromised by any conflicts of interest or even the appearance of a conflict. You will notify Lubrizol if you become aware of any personal interests, activities or relationships that are interfering with objective business decisions.

### **Gifts and Entertainment**

You will ensure that only appropriate gifts and entertainment are offered to any Lubrizol employees or business partners. Nothing should be offered that could compromise – or even appear to compromise – any business decisions. Gifts of cash, or cash equivalents like prepaid Visa® gift cards, are prohibited, regardless of amount. Business entertainment will always be reasonable and appropriate for the occasion. These rules do not change during holiday seasons.

### **Financial Transactions**

You will ensure that all records, in electronic or written form, related to your business with Lubrizol are accurate and complete. This means that all invoices will accurately describe all goods and services provided and will specify applicable charges and bank details.



## Compliance with laws

At Lubrizol, being a highly ethical company means that we comply with laws wherever we operate. As our supplier, you are required to share this commitment.



### **Anti-bribery/anti-corruption laws**

You agree to prohibit bribery and corruption in all aspects of your activities and in your supply chain. This applies to commercial bribery and bribery of government officials. You also agree to establish appropriate internal controls to prevent or detect any violations of the anti-corruption or anti-money laundering laws.

### **Fair Competition and Antitrust Laws**

You agree to compete fairly and ethically and to operate in compliance with all antitrust and competition laws. Prices to Lubrizol will be set fairly and not influenced by collusion or any other anti-competitive activity.

### **U.S. Trade, Export Control and Sanctions**

You will comply with U.S. and other international trade laws and regulations when supplying goods and services to Lubrizol, and to ensure that all imports and exports are cleared correctly and transparently. You will immediately notify Lubrizol if you source any raw materials or other inputs from persons, countries or regions that are subject to U.S. sanction or otherwise prohibited by Lubrizol.



### **Conflict Minerals**

You will comply with all laws, regulations and standards related to conflict minerals. Lubrizol prohibits the use of conflict minerals from noncompliant smelters. You will comply with all requests from Lubrizol for information regarding your conflict minerals due diligence activities.

### **Privacy Laws**

You will comply with all applicable laws, regulations, and standards regarding privacy of personal information.

### **Confidentiality**

You will comply with any valid agreements to not disclose or use the confidential information and/or intellectual property of others except for permitted purposes.

### **Operating Permits**

You will comply with all applicable laws and regulations regarding health and safety of employees. Obtain and maintain all permits and licenses required to operate.



## Information security

At Lubrizol, we take great care to safeguard our information systems, and the data that resides on its systems, from cyberattack. As our supplier, you are required to protect any information that we share with you from cyber security threats.



### **Cyber Security Risk Management**

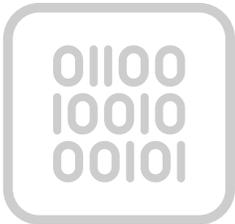
You will implement a process to identify and manage emerging and evolving cyber security risks and to regularly review such risks for developing strategies to detect, prevent and respond to them. You will minimize the risks of incidents that affect the products and services provided to Lubrizol.

### **Security Controls**

You will implement security controls and related monitoring systems to prevent, detect and respond to security incidents. You will protect Lubrizol data from unauthorized access, use, damage, and disclosure and regularly review the effectiveness of the applied security controls.

### **Cyber Incident Reporting**

You will implement a consistent incident management framework focusing on fast risk mitigation and customer security and notify Lubrizol within 48 hours when incidents occur involving data of Lubrizol, our employees or our business partners.



### **Reporting of Vulnerability**

If applicable, you will implement a reporting channel for vulnerabilities identified or detected in products or services provided to Lubrizol within 72 hours. You will investigate such vulnerability reports for inclusion in the review of cyber security risks.

### **Use of Artificial Intelligence**

You will ensure responsible use, handling, expandability, protection of privacy, safety, and reliability in any use of artificial intelligence, including machine learning and deep learning. Humans will remain the driving force behind the development of any processes in which artificial intelligence is used.

### **Confidentiality and Data Protection**

You will protect intellectual property rights, confidential data and information of business partners and third parties. You will disclose or use it only for the purpose of processing or executing the respective order. You will comply with all contractual obligations, relevant data protections laws, regulations, and standards, and instruct all employees who come into contact with the relevant confidential data and/or information regarding supplier's confidentiality obligations.



## Accountability for compliance with this Supplier Code of Conduct



As our supplier, we expect you to implement systems and controls to ensure compliance with your obligations outlined in this Code. This means that you should:

- Engage with your own supply chain to ensure they embrace practices consistent with this Code. This effort should ensure that your suppliers are increasing transparency and traceability of materials, are maintaining accurate records about their suppliers and are able to trace volumes back to supplying sites.
- Establish and conduct training to provide your employees with the appropriate level of knowledge and understanding of this Code, as well as applicable laws, regulations and standards.
- Take prompt action to remedy any violation of this Code, and to inform us if the violation involves good or services provided to Lubrizol.

Our suppliers are key partners in our supply chain. You will cooperate with Lubrizol in all due diligence activities, including providing data and information necessary for Lubrizol to conduct investigations and/or meet its reporting obligations regarding activities in its supply chain.

Specific contractual obligations remain unaffected by this Code and, in the event of a conflict, take precedence over the provisions of this Code. We reserve the right to assess, audit and monitor your compliance with this Code and to take appropriate steps to address any non-compliance. We also reserve the right to discontinue any relationship if we determine that there has been a violation of this Code.