

Code of Ethics Applicable to Senior Financial Officers - PolyOne Corporation

Application and Standards of this Code of Ethics

This Code of Ethics applies to PolyOne's Chief Executive Officer, Chief Financial Officer and Corporate Controller. It was adopted by the company on December 9, 2003. In addition to their responsibilities under this Code of Ethics, these officers must comply with PolyOne's Code of Conduct.

The standards of this Code of Ethics, as outlined below, are designed to promote honest and ethical conduct by each of the officers described. Each officer must:

- be aware of potential, real, or perceived conflict of interest situations between personal and professional relationships. All such conflicts of interest must be avoided. Should any such conflict of interest situation arise, the officer must report the details of the situation to both the chief legal officer and the chair of the audit committee for disposition;
- be responsible, to the best of his or her ability, for full, fair, accurate, timely and understandable disclosure in reports and documents that the company files with, or submits to, the SEC and in other public communications made by the company;
- maintain compliance with applicable governmental laws, rules and regulations;
- report violations of this code of ethics in accordance with the procedures outlined below; and
- be personally accountable for adherence to this Code of Ethics.

Acknowledgment statement

Each of the officers to which this Code of Ethics applies has signed an acknowledgment statement indicating his or her understanding of this Code of Ethics and to confirm their on-going compliance with it.

Reporting of violations of the Code of Ethics

Should situations arise that cause a potential conflict of interest for any one of these officers, then the details of the circumstances of the potential conflict of interest must be reported (including self-reporting) immediately to the Chief Legal Officer, the Chair of the Audit Committee and the independent auditor. Other potential violations of this code of ethics must be reported (including self-reporting) to the Ethics Officer, the Chair of the Audit Committee and the independent auditor.

Non-compliance with the Code of Ethics

Verified non-compliance by any of the applicable officers with this code of ethics will result in an evaluation of the non-compliance situation by the Audit Committee. Disciplinary actions taken will be disclosed.

Officer Name (please print)

Officer Signature

Date