Supplier Code of Conduct

PolyOne Corporation and Subsidiaries

PolyOne is committed to being a world-class, sustainable organization. Our unique position in the supply chain allows us to work with critical partners both upstream and downstream to reduce the impact of our services and products on human health and the environment.

We recognize our responsibility extends beyond our operational and process boundaries to our supplier partners. To ensure a mutually beneficial and productive relationship, PolyOne expects all of our suppliers and their employees, personnel agents, and subcontractors (collectively referred to as “Suppliers”) to fully comply with applicable laws and regulations and adhere to internationally recognized environmental, social, corporate governance and management system standards.

Environment

- Comply with all applicable environmental, health, safety and security regulations. This includes protecting the health and safety of the communities and neighborhoods in which you operate.
- Identify and manage risks to human health and the environment during development, transport, use and disposal of your products.
- Ensure systems are in place for safe handling, storage, recycling, reuse and management of waste, air emissions and wastewater discharges. Activities that have the potential to adversely impact human health or the environment shall be appropriately managed, measured, controlled and handled prior to release of any substance into the environment.
- Ensure systems are in place to prevent or mitigate accidental spills and releases into the environment.
- Use natural resources (e.g. water, sources of energy, raw materials) in an economical way. Negative impacts on the environment and climate shall be evaluated to minimize or eliminate them at their source.
- Engage in the development and use of climate-friendly products and processes to reduce power consumption and greenhouse gas emissions.

Social

- Implement appropriate processes and procedures to ensure adequate human health and safety.
- Support basic human rights and not use any slave labor, child labor or labor from human trafficking in connection with any product or service supplied to PolyOne.
- Refrain from knowingly discriminating against individuals based on race, sex, sexual orientation, gender identity, age, color, religion, national origin, disability, genetic information, protected veteran’s status, or other legally protected classifications.
- Responsibly source Tantalum, Tin, Tungsten and Gold or their derivatives (3TG metals). Products supplied to PolyOne must not directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or an adjoining country (the “Covered Countries”), and abide by PolyOne’s Policy Statement on Conflict Minerals regarding products supplied to PolyOne. In furtherance of the foregoing, we expect our Suppliers to:
  - Supply only conflict free 3TG metals to PolyOne;
  - Engage in due diligence of supply chains by following a nationally or internationally recognized due diligence framework;
  - Upon request, report to PolyOne on its due diligence process and certify that 3TG metals supplied to PolyOne from the Covered Countries are conflict free; and
Promptly report to PolyOne any supply chain changes regarding the origin of 3TG metals or conflict status.

- Treat employees with respect and provide a workplace free of harassment and/or discrimination.
- Enable employees and other stakeholders to report questions or concerns related to your business, people or products.
- Uphold freedom of association and the right to collective bargaining in accordance with applicable laws.

**Corporate Governance**

- Conduct all commercial negotiations in a responsible, ethical and lawful manner.
- Provide all proposals in writing with a direct copy of business correspondence to the appropriate sourcing and procurement professionals.
- Refrain from offering PolyOne employees money, loans, credits, prejudicial discounts, gifts, products or services for their personal use or benefit. Meals and entertainment for the purposes of developing business relationships must be within reasonable, customary, and lawful business practices in the country or industry.
- Comply with the U.S. Foreign Corrupt Practices Act and the UK Bribery Act, as well as other applicable laws dealing with bribery of government officials or private enterprises. In connection with any transaction as a Supplier to or involving PolyOne, the Supplier must not transfer anything of value, directly or indirectly, to any government official, employee of a government-controlled company, or political party, or any personnel of a private enterprise to obtain any improper benefit or advantage without prior, written approval from PolyOne’s legal counsel. PolyOne also prohibits commercial bribery. Suppliers must keep a written accounting of all payments, including any gifts, meals, entertainment or anything else of value, made on behalf of PolyOne. Accounting records should be available to PolyOne upon request.
- Avoid conflicts of interest that involve business dealings with family members and close personal-friends at PolyOne.
- Comply with all applicable import and export controls, as well as trade compliance and antitrust laws.
- Treat all transactions and dealings with PolyOne as confidential and proprietary. External communications about PolyOne require PolyOne’s prior written consent.
- Provide value-added services by sharing engineering, technical and product information with PolyOne associates for the purpose of making process and productivity improvements; developing project scopes and equipment specifications; and demonstrating best business practices.
- Inform PolyOne of financial, economic, supply changes (including origin or conflict status of 3TG metals), government regulations or other materials conditions that could affect ongoing operations or operating decisions.

**Management Systems**

- Comply with all applicable legal and other requirements by implementing, when feasible, internationally recognized management systems.
- Continuously improve performance by appropriately assessing risk and implementing mitigating measures.

Implementing sustainability into Supplier performance is important to us. You are a crucial part of helping us to reduce our impact on human health and the environment as well as producing products and services ethically. We are counting on your commitment to these practices.

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