

honesty



integrity



respect



responsibility



Overview

Huntsman has established conduct standards for its business related practices that are set out in our Business Conduct Guidelines. These Huntsman Business Conduct Guidelines (“Guidelines”) reflect our commitment to our values of honesty, integrity, respect, and responsibility. Huntsman expects that its vendors will share and embrace these values as well as our commitment to regulatory compliance.

While vendors are independent entities from Huntsman, the business practices and actions of a vendor, when conducting business with or on behalf of Huntsman, may significantly impact and reflect upon our Company. Because of this, Huntsman expects all vendors and their employees, agents, and subcontractors (“representatives”) to follow our high ethical standards set forth in these Guidelines, while they are conducting business with us or on our behalf.

It is the responsibility of our vendors and representatives to understand and adhere to Huntsman’s expectations. Vendors should notify a member of Huntsman management if and when any situation develops that causes the vendor or representative to operate in a way that may be in conflict with Huntsman’s expectations. Huntsman may request the removal of any vendor or representative who behaves in a manner that we consider to be acting inconsistent with these Guidelines or any Huntsman policy.

Expected Conduct of Vendors and Representatives

While conducting business with or on behalf of Huntsman, all vendors and representatives are expected to conduct their business interactions and activities with integrity and in compliance with the applicable laws and regulations of their respective countries. Huntsman expects its vendors and representatives to share its commitment to human rights and equal opportunity in the workplace. In addition to the obligations under the vendor’s agreement with Huntsman, all vendors and representatives are required to follow our ethical standards, which include expected conduct in the areas of regulatory compliance, business practices, and employment. A summary of these expectations is noted in this document.

The full text of the Huntsman Business Conduct Guidelines can be found at www.huntsman.com.

I. Expected Regulatory Compliance Practices

Vendors and their representatives are expected to:

- Conduct business in compliance with antitrust and fair competition laws that govern the jurisdictions in which they do business;
- Comply with the anti-corruption laws of the countries in which they do business;
- Not make any direct or indirect payments, proposed payments, facilitating payments, or offer something of value to another person or someone who is an employee of the government or a public agency with the intent to influence him or her;
- Comply with all applicable environmental laws and regulations;
- Be honest and truthful in discussions with regulatory agency representatives and government officials;
- Comply with all applicable trade control laws that apply to many aspects of Huntsman operations; and
- Not impose improper boycott requirements on Huntsman.

II. Expected Business Practices

Vendors and their representatives are expected to:

- Honestly and accurately record and report all business information and comply with all applicable laws regarding their completion and accuracy.
- Comply with the intellectual property ownership rights of Huntsman and others including but not limited to patents, trademarks, and trade secrets and use software, hardware and content only in accordance with their associated license or terms of use;

- Protect and responsibly use the physical and intellectual property of Huntsman;
Use such assets only when authorized by Huntsman to do so;
Use Huntsman-provided information technology and systems (including e-mail) primarily for Huntsman business-related purposes and in accordance with applicable Huntsman policy;
Huntsman policy prohibits vendors and representatives from using Huntsman-provided assets, technology or systems to create, access, store, print, solicit, or send any material that is harassing, discriminating, abusive, threatening violence or similarly inappropriate or unlawful;
- Comply with Huntsman requirements for maintenance of passwords, confidentiality, and security and follow its privacy procedures as a condition of receiving access to Huntsman's internal corporate network, systems, and buildings;
- Use good judgment and moderation when offering gifts or entertainment to Huntsman associates;
In general, vendors and representatives should refrain from giving Huntsman associates an individual gift with a greater value than \$50 USD or a combination of gifts with a value greater than \$125 USD in a 12-month look-back period;
Vendors and representatives should never offer a bribe, kickback, or bartering arrangement for goods or services or any other incentive to a Huntsman associate in order to obtain or retain Huntsman business;
Any gifts or entertainment given or received must be in compliance with the law, and must not violate Huntsman policy;
- Avoid an actual conflict of interest or even the appearance of a conflict of interest.
Vendors or representatives should not deal directly during negotiation or otherwise with any Huntsman associate whose spouse or other family member or some other close relation is an employee or has a personal or financial interest in the vendor or the vendor's business;
- Avoid insider trading by buying or selling Huntsman or another company stock when in possession of information about Huntsman or another company that is not available to the investing public and that could influence an investor's decision to buy or sell stock; and
- Create, retain and dispose of business records in full compliance with all applicable legal and regulatory requirements.

III. Expected Employment Practices

Vendors and their representatives are expected to:

- Cooperate with Huntsman's commitment to providing a workplace free of sexual or other harassment and discrimination;
- Provide a safe and healthy work environment and comply with all applicable safety and health laws, regulations and practices;
- Prohibit the use, possession, distribution, and sale of illegal drugs while on Huntsman owned or leased property;
- Use only voluntary labor; the use of forced labor, whether in the form of indentured labor or otherwise, is prohibited;
- Comply with all local wage and hour and minimum working age laws and requirements; the use of child labor is prohibited; and
- Maintain employee records in accordance with local and national regulations.

Reporting Concerns and Requesting Assistance

If a vendor or representative has a question about a particular situation, or needs to report a problem or concern, they are encouraged to work with their primary Huntsman contact in resolving a business practice or compliance concern. Huntsman recognizes, however, that there may be times when this is not possible or appropriate. In such instances, a vendor or representative can:

- Contact the Huntsman Ethics and Corporate Compliance Department at +1.281.719.6000.
- Call the Speak Up helpline, which can be accessed at www.huntsman.com/speakup, or,
- Send an e-mail to the Huntsman Ethics and Corporate Compliance Department at ethics@huntsman.com.

Huntsman does not tolerate retaliation against another person. No one who reports any suspected legal or policy violation in good faith will be subject to retaliation for making such a report. Good faith means that the individual coming forward with all of the information believes he or she is giving a sincere, truthful, and complete report.

HUNTSMAN

Enriching lives through innovation

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