

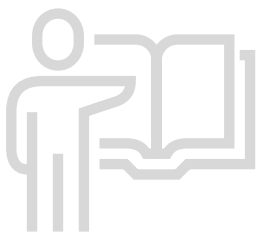


# Code of Ethics

*Lubrizol*



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This publication replaces the Code of Ethics dated 2017, and it applies to The Lubrizol Corporation and its subsidiaries and majority-owned joint ventures, as well as to Lubrizol partners.



## Ethics—our foundation for a sustainable future

For over 90 years, Lubrizol has had an unyielding commitment to operating ethically and responsibly while creating value for employees, customers, consumers, and the communities where we live and work. This commitment was the cornerstone on which our company was built, and it endures today.

Fundamental to the sustainability of Lubrizol is the company's commitment to strong business ethics, because creating a positive impact on the world requires that we hold ourselves to the highest standards of conduct.

We must act with honesty and integrity so that customers and consumers trust us to deliver solutions that will improve lives. We must nurture a diverse and inclusive workforce, where everyone is treated with dignity and respect so that we can bring new ideas and perspectives to more effectively innovate and solve problems. We must reward and celebrate employees who speak up and ask questions because they demonstrate that they care about Lubrizol and the many people who depend on Lubrizol's success.

Our unwavering commitment to honesty and integrity, and to doing business the right way, is critical to who we are as a company. This has guided us for over 90 years and will guide us for decades to come. As we continue on our journey to create a cleaner, smarter, better world, refer to this Code for guidance and direction.

Rebecca B. Liebert  
President and CEO

Our goal is for  
**100%**  
of employees to  
believe that Lubrizol is  
a place where ethical  
conduct is celebrated  
and rewarded.



## One Lubrizol approach to ethics

The world is complex, and the opportunities ahead are boundless. As we face the inevitable challenges that will arise, this Code of Ethics applies, however or wherever a question or problem may be encountered. We walk away from business if we cannot achieve it ethically. We hold all employees, leaders and partners accountable for complying with the Code. And we do not make exceptions even if important business partners ask us to look the other way or to cut corners. At Lubrizol, we are unified in our mission to protecting the company's reputation by conducting business with the highest standards of honesty and integrity.



### Honesty and integrity at Lubrizol

Lubrizol's founders believed that operating with honesty and integrity is the only way to do business. This commitment has been a cornerstone of Lubrizol's culture since the founding of the company in 1928, and it remains just as important today.



### **What does it mean to act honestly?**

Acting honestly means intending to be truthful, accurate and straightforward in communications. It means not stealing, cheating, or using fraud or deception to gain an advantage.

### **What does it mean to act with integrity?**

Acting with integrity means making decisions based on values. It requires doing the right thing, even if no one is looking, and speaking up when something does not look right.

The requirement to act with honesty and integrity applies to every situation that may be encountered in working for Lubrizol. It is not limited to the topics covered in the Code. Good judgment is required in all situations.



## Responsibilities of employees, leaders and Lubrizol partners

Every person who works for Lubrizol is accountable for complying with the Code. This includes all Lubrizol employees as well as any person or firm engaged to represent Lubrizol.

### Employees

Every employee of Lubrizol is required to:

- Read and understand the Code as well as related policies;
- Demonstrate high standards of ethical business conduct;
- Comply with the Code even if it requires more than the law requires; and
- Complete all required ethics training and acknowledgments when due.

Employees also have a duty to ask questions if help or guidance is needed and to raise concerns if problems are suspected.

### Leaders

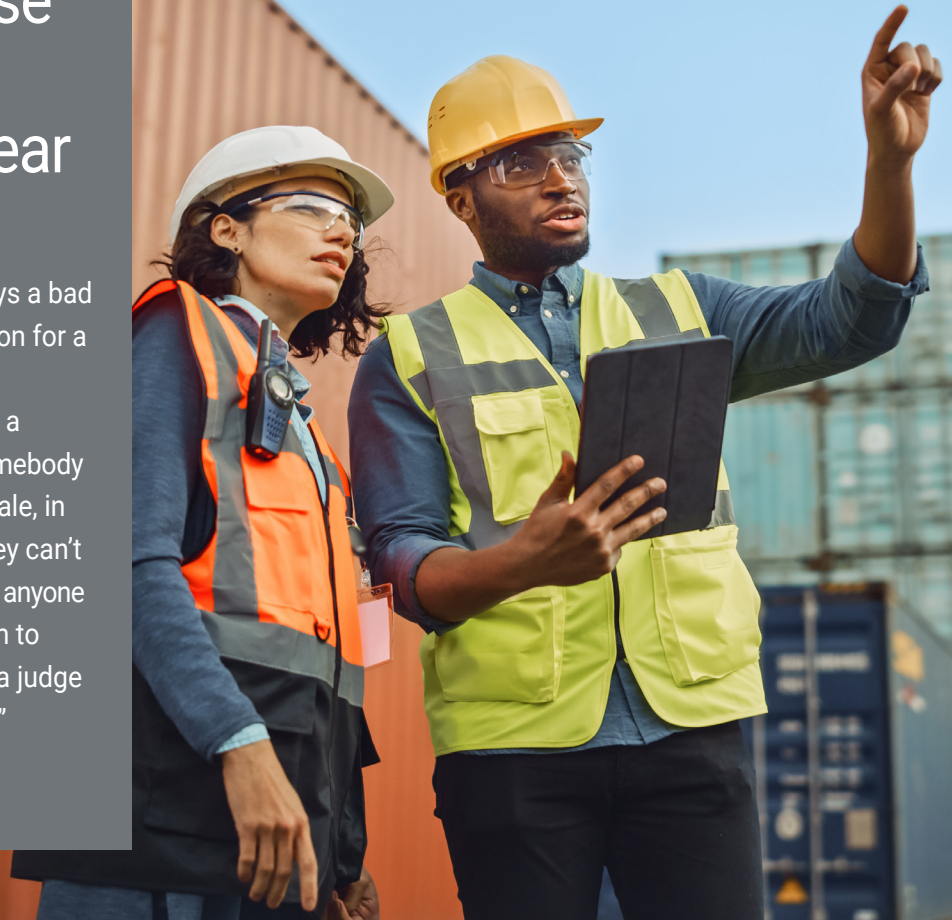
Leaders at Lubrizol also are required to:

- Create a work environment in which ethical behavior is expected and celebrated;
- Ensure all direct reports complete required ethics training and acknowledgments when due;
- Promote and encourage discussion of ethics questions and seek assistance if the answers are unclear;
- Immediately notify the corporate ethics office or a local ethics leader when made aware of possible violations of the Code; and
- Take appropriate action when it is determined that a violation has occurred.

“Sometimes your associates will say,  
**‘Everybody else  
is doing it.’**  
Whenever I hear  
that, I cringe.

This rationale is almost always a bad one if it is the main justification for a business action. It is totally unacceptable when evaluating a moral decision. Whenever somebody offers that phrase as a rationale, in effect they are saying that they can't come up with a good reason. If anyone gives this explanation, tell them to try using it with a reporter or a judge and see how far it gets them.”

– Warren Buffett



### **Lubrizol partners**

Lubrizol partners are advisors, agents, consultants, contractors, distributors or other representatives acting on Lubrizol’s behalf. All Lubrizol partners are expected to conduct their activities according to the highest standards of ethical behavior and are required to comply with the Code when acting on Lubrizol’s behalf. A Lubrizol partner that fails to act in a manner consistent with the policies and principles set out in the Code will jeopardize its business with Lubrizol.

#### **Our accountability and commitment to honesty and integrity:**

- *We act honestly in the work we do for Lubrizol.*
- *We act with integrity based on Lubrizol values.*
- *We do the right thing, even if no one is looking.*
- *We know our strong business ethics are the foundation of a sustainable future.*
- *We adhere to our responsibilities as employees, leaders and Lubrizol partners.*



## Speaking up

Lubrizol celebrates people who speak up. People who raise questions or concerns make sure that Lubrizol's best interest is protected and show that they care about Lubrizol's reputation.

One way to speak up is by reporting a concern. You can report a concern even if you are not sure that you have all the facts and information to prove that wrongdoing occurred, or that there has been a violation of the Code. All that is needed is a good faith belief that there may be a problem that should be addressed.

Another way that you can speak up is by seeking guidance. Asking a question is a good way to prevent a problem from arising in the first instance.

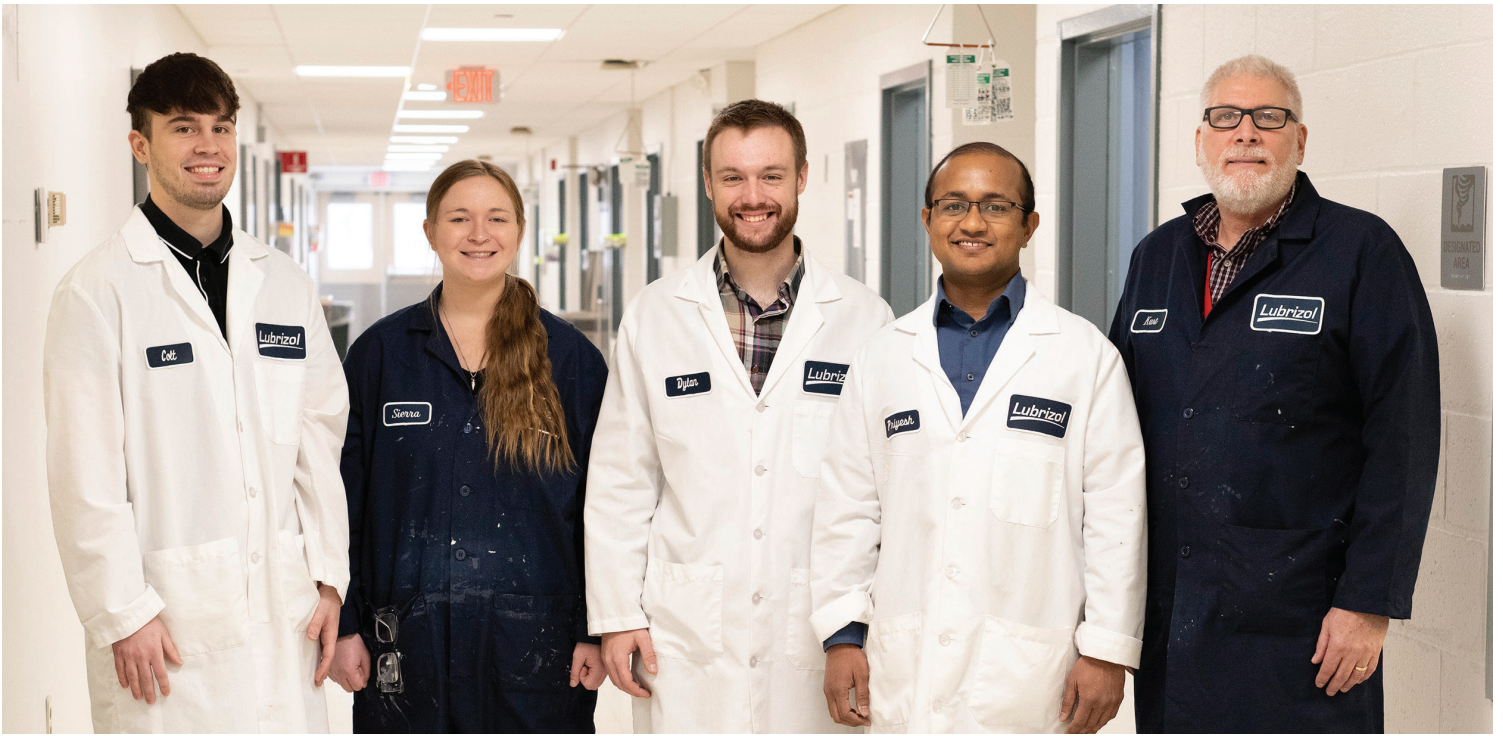


### No retaliation policy

Lubrizol strictly prohibits retaliation against any person who, in good faith, asks a question, raises a concern, or participates in an ethics investigation. Good faith means believing that the information being provided is true; it does not mean that the information has to be correct or that all of the facts have to be known before coming forward.

If you feel you have been the subject of retaliation, either for reporting an ethics concern or asking an ethics question, or as a result of participating in an ethics investigation, you need to speak up. If retaliation is confirmed, it will result in disciplinary action up to and including termination.





## Confidentiality, cooperation and an employee's role in ethics investigations

Allegations regarding ethical misconduct can be very sensitive in nature. For this reason, investigations are managed with discretion. For instance, if you are interviewed as part of an ethics investigation, you may be asked to share what you know but, to provide anonymity to those involved, you may be given few details about the concern being investigated or the source of the report.

If you are asked to help with an ethics investigation, you have a duty to cooperate fully and answer truthfully. Intentionally providing false information or interfering with an ethics investigation is a serious violation of the Code.

In accordance with Lubrizol's Mobile Device Policy, you may be required to make your electronic devices (such as a mobile phone) that you use for Lubrizol business available for inspection and imaging. Any review or imaging will comply with applicable law.

The corporate ethics office reviews all ethics questions and concerns that it receives. If you report an ethics concern, you can be assured that it will be taken seriously, and appropriate corrective action will be implemented if the Code has been violated. While the details of an ethics investigation's conclusions may not be shared, you will receive feedback about your concerns when the investigation is complete.



**Consequences of violating the Code**  
Depending on the seriousness of the violation, disciplinary action could be anything from verbal coaching or training to more formal action up to and including termination of employment.

## Resources for questions or concerns

There are many resources available for ethics questions or concerns. You can contact your supervisor, your local ethics leader, or the corporate ethics office. The ethics hotline is also an available resource for reporting concerns. It can be used to submit a report by telephone or online in many languages. See the [last page](#) of the Code for contact information and other available resources.

For anonymous reports through the ethics hotline system, be sure to provide as many details about the concern as possible. For example, providing the date when an incident occurred, specific details about the events and names of people or companies involved, as well as the names of other people who may be witnesses or have information, will help ensure that a thorough investigation can be conducted. Keep in mind that it is difficult to substantiate anonymous reports without adequate information.

*Anonymous reports are accepted through the ethics hotline system.*

### Our accountability and commitment to speaking up:

- *We raise concerns when we believe in good faith that something is wrong.*
- *We ask questions when the proper course of action is not clear.*
- *We come forward with confidence knowing Lubrizol never tolerates retaliation.*
- *We have a duty to cooperate with an ethics investigation if asked.*
- *We take action because we are accountable for protecting Lubrizol's reputation.*

## FAQ

**Q: Where can I find the name of my local ethics leader?**

A: You can find a current list of all local ethics leaders on the Ethic page on Lubrizol News.

**Q: Lubrizol recently acquired the company where I work. When does the Code begin to apply at my location?**

A: The Code applies from the day the business becomes part of Lubrizol. If you are concerned that something does not comply with the Code or any other Lubrizol policy, you have a duty to speak up. Please do so right away.

**Q: I reported a concern to the ethics hotline that I do not believe has been handled because the misconduct I witnessed continues. What should I do?**

A: If the misconduct continues, you are encouraged to reach out to the corporate ethics office directly. But if you prefer, you can update your original report or submit a new report to the ethics hotline (<https://brk-hotline.com>).

In your report, please be sure to provide as much detail as possible about the continuing concern, including a description of the concern you believe to be a violation of the Code, the dates when the concern occurred and the names of others who have information.

**Q: Last month, I reported a concern about a potential conflict of interest I thought a co-worker had with a supplier. Since the investigation, the co-worker no longer involves me in meetings or discussions about projects on which we both work. Is this behavior OK?**

A: Retaliation is adverse action that directly relates to an employee's involvement in an ethics investigation. If you believe your co-worker is retaliating against you because of the concern you reported, you should report this change in behavior to your supervisor. You can also reach out to the corporate ethics office. Lubrizol has a strict No Retaliation Policy.



## People

The most talented and innovative people want to work for an employer that is committed to ensuring everyone has a safe, respectful and inclusive place to work, where differences are embraced, and collaboration is rewarded. Attracting and retaining the highest quality employees is essential for Lubrizol to fulfill its mission to help create a cleaner, smarter, better world.

Highlighted here are several important areas where you are required to support Lubrizol's commitment to people.



### **Employee relations concerns**

Contact the *Global Employee Relations Office* (see the [last page of the Code](#)) for questions or concerns related to the following matters:

- *Customer mistreatment*
- *Discrimination*
- *Drugs and alcohol*
- *Harassment*
- *Interpersonal conflict*
- *Misconduct*
- *Retaliation against whistleblowers in non-financial matters*
- *Wage and scheduling*
- *Workplace violence*

## Diversity, inclusion and respect for others

Lubrizol's continued success is dependent upon having a diverse workforce and an inclusive culture where everyone is treated with dignity and respect. Lubrizol provides equal employment opportunities for qualified individuals without regard to race, color, religion, sex, gender identity, national origin, age, marital status, military service, disability, sexual orientation, genetic information, citizenship or social or economic status.

Every Lubrizol site must be a place where everyone feels safe, engaged and valued, where differences are appreciated, and where new ideas and perspectives are welcomed. The actions and interactions of every employee, Lubrizol partner and visitor must be professional and carried out with respect for all people, regardless of where work on behalf of Lubrizol is conducted.

# Monitoring

*Lubrizol monitors use of information systems to ensure compliance. Communications made while using Lubrizol's systems are not private.*



*Lubrizol reserves the right to block offensive, illegal or non-business related sites and, in accordance with applicable law, to intercept and review the entire content of any messages or data transmitted, stored on or deleted from Lubrizol devices, systems and networks.*

Electronic devices must be used in respectful and responsible ways. Communications on a Lubrizol-issued device (or on a personal device while working on Lubrizol's behalf) must be professional and appropriate, and must never include offensive, obscene, sexually oriented or threatening content.

Harassment, hostility, threatening or demeaning behavior (for example, a racial slur, sexual innuendo or offensive joke) of any kind has no place at Lubrizol and is not tolerated. Discrimination in violation of Lubrizol's commitment to treating all people with dignity and respect is strictly prohibited.

## **Our accountability and commitment to people:**

- *We treat each other with dignity and respect.*
- *We embrace our differences and cultivate a culture of inclusion.*
- *Our actions and interactions with others are always professional.*
- *We are responsible for our behavior—deeds and words—whether face to face or while using a device.*

**Q: How can I report an employee relations concern?**

**A:** See the [last page](#) of the Code for contact details. If you report an HR or employee relations matter to the corporate ethics office or through the ethics hotline, it will be referred to the employee relations office for review and handling.

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**Q: I am concerned that my supervisor, who is a long-term employee, has been making inappropriate remarks and jokes about women for years. This is common knowledge, but people ignore his behavior saying it is just part of his personality. What should I do?**

**A:** Working for Lubrizol for many years does not excuse behavior that violates the Code. You should discuss your concern with your human resources partner. If you are not comfortable talking with your human resources partner, you should contact the employee relations office. See the [last page](#) of the Code for contact details. Please be sure to provide as many details as you can, including what was said, when the comments were made and the names of others who heard the comments.

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**Q: I, along with others at my location, received an email from a co-worker complaining about a disorderly situation onsite. Within that email, the employee used disrespectful and offensive statements to express their dissatisfaction with the problem. This bothered others, but no one has spoken up. What should I do?**

**A:** You should discuss your concern with your supervisor or your human resources partner if it makes sense in the circumstances to do so. If you are not comfortable raising the concern through these channels, you can contact the employee relations office for assistance. See the [last page](#) of the Code for contact details.

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## Human rights in the workplace

Lubrizol believes that every person is entitled to fundamental human rights including the right to work willingly, to move freely and to receive fair wages. Lubrizol prohibits all forms of human trafficking, forced labor and child labor at its facilities and has adopted policies and practices to ensure employees are compensated competitively and in compliance with applicable laws.

In this regard, Lubrizol has committed to:

- Only employ individuals who willingly seek employment;
- Not hire any person under 15 years of age;
- Forbid human trafficking, slavery or servitude of any kind within our operations;
- Comply with all applicable labor laws, including restrictions on working hours and rights to associate with others;
- Provide wages and benefits that meet or exceed legal requirements (with overtime pay as applicable) and provide full-time employees with a living wage; and
- Provide a safe and healthy workplace for all individuals working or visiting our facilities.

### Transparency in Lubrizol's supply chain

Lubrizol strives to ensure that its supply chain reflects its respect for the lives of all people and support for human rights. To that end, Lubrizol has adopted a Supplier Code of Conduct, which can be found on [www.lubrizol.com](http://www.lubrizol.com).

### Our accountability and commitment to human rights:

*We are accountable for reporting any concerns or suspected violations of Lubrizol's commitment to human rights, either in our workplace or in our supply chain.*



**You have stop-work authority if conditions or behaviors are unsafe!**

*If you see someone who is violating a safety procedure, you must immediately:*

- *Tell the person to stop the activity immediately, if feasible to do so without putting yourself in personal jeopardy; and*
- *Notify your supervisor or local safety personnel so the situation can be addressed, and future problems can be prevented.*

## Health and safety

Lubrizol embraces a culture where everyone is empowered to be a safety leader in the workplace. Lubrizol maintains a steadfast commitment to providing employees with the knowledge and tools to do their jobs safely. All employees are expected to proactively identify, assess and manage risk with a mindset of continuously improving safety and eliminating hazards or unsafe conditions. Lubrizol conducts its business according to the guiding principles of Responsible Care®.

Employees have important responsibilities to ensure they and visitors are safe in the workplace. Those responsibilities include following policies and procedures designed to keep everyone safe, eliminating unsafe conditions, completing all required training and asking questions if any requirement is unclear. Employees also must ensure visitors receive required safety training and follow Lubrizol's safety rules.

### Our accountability and commitment to health and safety:

- *We pay attention to our surroundings and look for hazards.*
- *We intervene when we see unsafe conditions or behaviors.*
- *We do not take shortcuts or bypass safeguards or other controls.*
- *We ask questions if any requirement is not clear.*
- *We follow all safety policies and procedures, including those referenced in the Code.*



## FAQ

**Q: I saw a contractor walking outside of the area designated for pedestrian traffic. I have no responsibility for the contractor or the area where he was walking. What should I do?**

**A: Safety is everyone's responsibility. If you see anyone at a Lubrizol facility doing something that violates a safety rule, you must immediately stop the activity if you can do so safely. In this situation, you should politely tell the contractor that walking within the designated area is a must for all pedestrians. You also should inform your supervisor or local safety personnel.**

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**Q: I saw someone throw a heavy metal fitting at a co-worker in an effort to be funny. It hit the co-worker in the head, but fortunately he was wearing a hard hat and was not injured. Since he was OK, is there any safety violation?**

**A: We are required at all times to keep our workplace safe and secure. That includes refraining from even playful conduct that could cause harm. Even though no one was hurt, this is a serious safety violation, and it must be addressed. Our commitment to safety means that we *never* put another person in harm's way. You should report the incident to your supervisor or local safety personnel immediately.**

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**Q: At my workplace, there are signs saying that safety glasses must be worn in operating areas of the plant. But an employee who works in the office never wears her safety glasses when walking through this area. I have asked her to wear safety glasses, but she claims that since she is not actually working in the area and just passing through quickly, she does not have to wear safety glasses. Is that acceptable?**

**A: This is not an acceptable practice. There are no exceptions when it comes to wearing proper personal protective equipment (PPE). Please explain this to the person the next time you see this happen. If she refuses to wear the safety glasses as required, you should bring it to your supervisor's attention. Your supervisor should then have a conversation with her supervisor to ensure the unsafe behavior is corrected.**

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## Environmental stewardship

Lubrizol is committed to operating in accordance with the highest health, safety, environmental and security standards, and ensuring its operations adhere to all regulatory requirements. Lubrizol strives to protect the environment through established practices and procedures that minimize the daily impact of its operations. Lubrizol continuously improves environmental performance and participates in internal and external audits to check progress.

### **Our accountability and commitment to environmental stewardship:**

- *We comply with policies related to the operation of our facilities and to the proper identification and disposal of waste.*
- *We provide accurate and complete information for environmental permits and other regulatory requirements.*
- *We set environmental goals and measure progress against them.*
- *We are mindful of risks, with the understanding that every employee has the obligation to elevate any health, safety, environmental or security problem to management.*
- *We are responsible for immediately reporting any leaks, spills or releases so they can be corrected promptly and prevented in the future.*
- *We know that any reports can be made without fear of retaliation.*



## Business integrity

Lubrizol demands integrity in all aspects of its business and operations. Employees and Lubrizol partners must make decisions and take actions that are aligned with Lubrizol's commitments, values and business objectives. This is vitally important to protect Lubrizol's hard-earned reputation in the marketplace.

Outlined here are important duties to support Lubrizol's commitment to business integrity.



### Protection of assets

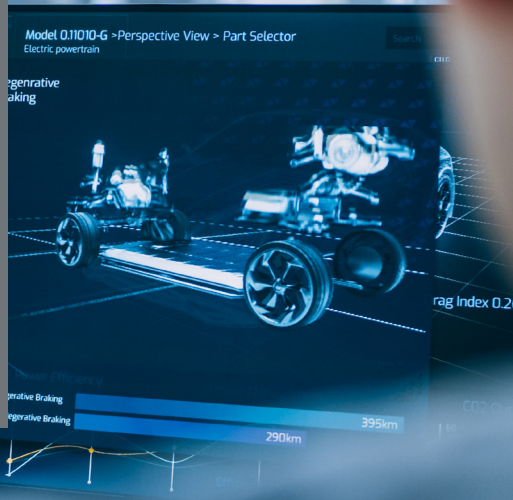
Lubrizol's assets result from decades of hard work and dedication by employees around the world. These assets are critical to Lubrizol's long-term success and include manufacturing and research facilities, capital equipment, offices, supplies, computer hardware and software, parts, raw materials and finished goods. They also include intellectual property, trade secrets and documents created by employees in the course of their work for Lubrizol.

#### **Protecting confidential information and intellectual property**

Confidential material can include a host of information Lubrizol does not want to share broadly, like business strategies, pricing and contract terms, or financial information. Intellectual property can include Lubrizol's name, trademarks, copyrights, formulations, knowledge and trade secrets.

# Security

*To protect Lubrizol's most sensitive assets, computer activity is monitored for unauthorized removal of Lubrizol documents and information. Unauthorized taking or copying any of Lubrizol's documents or information for any use or purpose that does not directly benefit Lubrizol, including for personal use or for sharing with anyone, is strictly prohibited.*



*If Lubrizol confidential information is transmitted outside the Lubrizol network, it should be encrypted and/or marked confidential. Your obligation to safeguard Lubrizol material is not limited to confidential information however. Any record, document, data set or file created for Lubrizol belongs to Lubrizol.*

You have an important role in safeguarding Lubrizol's confidential information. You have an obligation to ensure:

- Information is stored in a secure location to prevent accidental or unauthorized disclosure;
- Only authorized tools and services, including cloud services, are used to store, access and protect the information;
- Access to the information is limited to those who have a need to know;
- A secrecy agreement is in place before the information is shared outside of Lubrizol; and
- Information is destroyed or returned to Lubrizol after expiration of the authorized use.

In addition, you must take care that sensitive matters, including Lubrizol's confidential information, are never discussed in public areas or where others can overhear.

Lubrizol protects its intellectual property rights by registering them with government authorities, entering into agreements that limit their disclosure and putting a stop to any misuse by others. If you believe someone is improperly using Lubrizol's intellectual property, you should contact the legal team immediately. See the [last page](#) of the Code for contact information.



## **Safeguarding information systems**

Information systems are critical assets that are vulnerable to cyberattacks by fraudsters who seek to steal Lubrizol's information or disable its systems and networks. You have a vitally important role to ensure the responsible use and security of these systems.

You can help to protect Lubrizol's information systems by:

- Not clicking on hyperlinks in emails from unknown or suspicious sources or opening suspicious files;
- Notifying the information security team immediately if Lubrizol systems are exposed to an outside threat;
- Keeping computers and mobile devices current with updates issued by the information solutions team and never attempting to disable or circumvent the software or technology that protects them;
- Keeping computers, tablets and mobile devices safe and secure from theft; and
- Using unique, strong passwords that are not shared with others.

## **Preventing and detecting fraud**

Threats of fraud can arise from anywhere—outside and inside Lubrizol. For this reason, Lubrizol maintains strong financial controls and information security protocols to detect and prevent fraud. Lubrizol is committed to continuously improving these controls and protocols, and you are responsible for adhering to them.

Fraud is committed in many ways and can appear in different forms. Some examples include:

- Spoofing (with an email or a telephone number) a legitimate Lubrizol partner or supplier to misdirect payments to fraudulent bank accounts;
- Establishing fake suppliers to whom illegitimate payments can be made;
- Overstating of goods or services on an invoice;
- Falsifying expense reports or timesheets; and
- Taking Lubrizol assets without proper authorization.

You must be attentive to suspicious activity and speak up if fraud or other wrongdoing is suspected. It is important to keep in mind that what is suspected or noticed may only be a fraction of the harm done. The sooner suspected fraud is reported, the more likely it is that Lubrizol can minimize or recover its losses.

## Our accountability and commitment to protect Lubrizol assets:

- *We adhere to established practices designed to keep Lubrizol's confidential information secure from unauthorized access.*
- *We prevent and detect fraud by staying alert and reporting suspicious activity.*
- *We use Lubrizol's information systems responsibly and safeguard them from attack by following information security protocols and procedures.*

## FAQ

**Q: Can I use my Lubrizol computer to send a personal email?**

**A:** You may use Lubrizol's information systems for personal communications if the use is appropriate, limited and does not interfere with your work responsibilities. Permitted uses do not include side business activities. No Lubrizol asset, such as a computer, copy machine or phone, may be used for outside employment.

**Q: I am leaving Lubrizol and I have a large number of personal documents and photos on my computer that I would like to take with me. Is there a way that I can do this without raising any alarms?**

**A:** Lubrizol systems are monitored to prevent unauthorized removal of Lubrizol assets. Therefore, if you have personal documents that you wish to remove from the system, you should first talk with your supervisor about what you wish to copy. Once your supervisor has approved, you should contact the solutions center for assistance with transferring your personal files in an appropriate manner.

**Q: One of my co-workers recently told me that he moved Lubrizol documents and other records to his personal cloud storage, because it is more convenient for him to access the files from the external site. Is it OK to do this?**

**A:** It is never acceptable to save Lubrizol documents outside of Lubrizol's network unless authorized by the solutions center. If you are having trouble working within Lubrizol's network, contact the solutions center for assistance.

**Q: I work at a Lubrizol subsidiary. A potential new supplier is requiring that we provide the subsidiary's financial information as part of its process to qualify Lubrizol as a new customer. Can I provide this financial information?**

**A:** Lubrizol's financial information is confidential and not typically shared. If you believe there is a legitimate business reason to share financial information, you must ensure that a non-disclosure agreement is signed by the new supplier before sharing the information. You should contact the legal team for assistance. See the [last page](#) of the Code for contact information.

**Q: I received an email from a supplier with directions to change banking details for payments. The email appears to be from my normal business contact at the supplier. Can I make the change in our records?**

**A: No.** The email could be fraudulent. Fraud is often perpetrated by someone gaining unauthorized access to the email system of another company, or by spoofing another person's email address. You must contact vendor master, which will follow a set of controlled steps designed to confirm that the directions are legitimate. In your communications with the supplier, be sure to only use the telephone number for the supplier that is on file in SAP or in other Lubrizol records. ***Do not use a telephone number provided in the email you received as it too could be fraudulent.*** Contact the corporate ethics office or your local ethics leader if the request is determined to be fraudulent.

**Q: Can employees take obsolete assets that Lubrizol no longer uses?**

**A:** No. Lubrizol property, even if broken, used or obsolete, should not be removed without authorization of the appropriate site leader.

For used office supplies or used office furniture that site management has decided to donate or discard, management can make these items available to employees to take. This should be done on a fair and impartial basis (for example, through a raffle or on a first come first served basis) so all employees have an equal chance to take the item.



### **Keeping outside employment separate from Lubrizol**

You can prevent conflicts of interest by:

- *Not using work hours or assets, such as Lubrizol email, copy machines or computers, for your outside employment;*
- *Not promoting products or services from your outside activity to Lubrizol or Lubrizol employees, customers or suppliers; and*
- *Not using your Lubrizol position to promote your outside activity.*

Veuillez consulter les tableaux 1.1 et 1.2 à la fin de cette section pour un résumé des obligations relatives à la déclaration et à l'approbation.

## **Conflicts of interest**

Lubrizol depends on its employees and Lubrizol partners to act in its best interests at all times. A conflict of interest is any outside interest, which interferes with a person's ability to do that. In addition to potentially leading to bad business decisions, conflicts of interest can lead to loss of trust with customers, consumers and other stakeholders.

Conflicts of interest can arise in many ways, and you must always consider whether a situation will compromise, or appear to compromise, your ability to act in the best interest of Lubrizol. If it might appear to an outsider that a personal interest is compromising your ability to make sound business decisions for Lubrizol, it is a problem. Any situation that creates a conflict of interest—or even the appearance of a conflict—must be reported to the corporate ethics office for resolution, even if it is not specifically listed or described in this section of the Code.

Discussed below are certain outside activities where conflicts can arise. Some require disclosure (refer to [Table 1.1](#)), while others require prior approval (refer to [Table 1.2](#)).





### **Business opportunities**

*Through your work for Lubrizol, you may learn of a business or investment opportunity of possible interest to Lubrizol. This information is considered a Lubrizol asset. Approval from the corporate ethics office is required before you may act on it privately or through any outside employment you may have.*



### **When is a relationship with a family member or friend so close as to cause a conflict of interest under the Code?**

*If it could appear to an objective observer that your relationship with a family member or friend could cause you to make decisions or take actions that are not in Lubrizol's best interests, the relationship presents at least the appearance of a conflict and must be reported to the corporate ethics office.*

Veuillez consulter les tableaux 1.1 et 1.2 à la fin de cette section pour un résumé des obligations relatives à la déclaration et à l'approbation.

## **Side businesses and other outside employment**

Conflicts may arise if an employee owns a side business or has employment outside of Lubrizol. This includes working as a consultant, contractor or employee for another business or serving on the board of another business, whether the position is paid or unpaid. Outside employment does not automatically amount to a conflict of interest, but it must be kept separate from the work that is done for Lubrizol. Refer to [Table 1.2](#) for types of outside employment that require prior approval of the corporate ethics office.

## **Expert witness engagements**

An employee may not act as a consulting or testifying expert witness without prior approval of the legal team.

## **Investments**

Personal financial investments are another area where conflicts of interest can arise. You must never make a personal financial investment that may influence—or may appear to influence—decisions made in your work for Lubrizol. Refer to [Table 1.2](#) for examples of investments that require prior approval of the corporate ethics office.

## **Purchasing decisions**

Purchasing decisions made on behalf of Lubrizol must always be based on need, price, quality, service and supply capabilities. You must never solicit or receive anything from a supplier in violation of the Code. You also must never make a purchasing decision for Lubrizol that is motivated by a personal interest or pressure another person to make a purchasing decision because of a personal interest.



### **Family and friends**

In some circumstances, the relationships you have outside of work can conflict with Lubrizol's interests. These may arise if a family member or close friend works for or owns a Lubrizol customer, supplier, competitor, or Lubrizol partner. For this reason, you must not:

- Engage a family member or close friend to provide services to Lubrizol;
- Review or approve work involving a family member or close friend; or
- Make or influence decisions that may benefit a family member or close friend.

If a family member or close personal friend works for a competitor, you must be careful not to discuss confidential information with them.

### **Personal friendships / romantic relationships**

When a personal friendship or romantic relationship develops in the workplace, it can cause conflicts of interest. Such relationships must never cause other employees to feel uncomfortable, unwelcome or disfavored. Supervisors may not have a romantic relationship with a subordinate or another employee in their management chain, even when the relationship is voluntary and welcome. The involved supervisor must report the relationship to the corporate ethics office as soon as it develops.



### **Transparency**

*The key to avoiding a conflict of interest, or an appearance of a conflict, is transparency.*

*Through disclosures and requests for approval, you can have a dialogue that ensures clarity and prevents problems from developing.*

## **Charitable activities and engagements**

Lubrizol encourages all employees to volunteer in the communities where it operates and where employees live and work.

Employees engaging in personal charitable activities must do so in the right way. While fundraising can be an essential part of volunteerism, employees may not directly solicit from others at work. Direct solicitations can make co-workers feel pressure to contribute, and if done during the workday, direct solicitations use time and resources that should be spent on the business of Lubrizol.

This restriction does not prevent employees from using bulletin boards or common areas to place information about personal charities they support, such as volunteer opportunities and fundraising items for sale. By using a common area and not individually reaching out to others, co-workers can decide without pressure whether or not to contribute or volunteer.

### **Our accountability and commitment to avoid conflicts of interest:**

- *We never make a decision for Lubrizol that is motivated by a personal interest.*
- *We consider whether our outside activities could compromise our ability to act in the best interest of Lubrizol.*
- *We ensure any outside employment we have is kept separate and does not conflict with our work for Lubrizol.*
- *We do not engage, review or approve the work of a family member or close friend for Lubrizol.*
- *We do not supervise employees with whom we have a personal or romantic relationship, and we immediately report the situation to the corporate ethics office if one develops.*
- *We do not directly solicit from other employees for charities we support.*
- *We seek guidance from our supervisor, the corporate ethics office or a local ethics leader when we are unsure about a matter covered by the Code.*

## FAQ

**Q: I have been employed with Lubrizol for many years. Over the course of my career, I have developed a friendship with the owner of a supplier that provides services to my team. We regularly get together for dinner and our families have celebrated some holidays together. Would this be considered a “close personal friend” under the conflicts of interest policy?**

**A: It is understandable that friendly relationships with business contacts may develop. But when the relationship becomes so close that it could cause others to question your ability to act without bias, as appears to be the case in this situation, the relationship is a “close personal friendship” under Lubrizol’s policy. The relationship should be disclosed to your supervisor and to the corporate ethics office. Another Lubrizol employee may need to take over responsibility for interactions with the supplier.**

**Q: I am a product manager for a Lubrizol business group providing ingredients for personal care products. I have been asked to consult for a start-up company that intends to supply ingredients for personal care products that are different from those sold by Lubrizol customers. Would this be acceptable?**

**A: It is difficult to answer this question without more specifics. The concern is that you would be consulting with another company in the chemical industry and unable to do so without using Lubrizol information. Also, you may be unable to act in Lubrizol’s best interest while fulfilling your obligations to the client.**

**Q: I have been offered an opportunity to act as a consultant for a market research company. The company is doing research in an area that relates to my work for Lubrizol, but they have assured me that I will not be asked to breach any confidentiality obligations to Lubrizol. Can I accept the offer?**

**A: Offers of this type are common and should be declined. Market researchers are often working for companies that are seeking competitive intelligence. You probably were contacted because of the specialized knowledge you have gained through your work for Lubrizol. It is possible that the research being collected by this company, including information provided by you, is for a Lubrizol competitor. Despite assurances that you will not be asked to disclose anything confidential, you may very likely be put in a position where you cannot fulfill your obligations to the market’s research company without sharing Lubrizol’s information.**

**Q: I am an account manager for a start-up company that is purchasing products from Lubrizol. They have asked me if I would like to make a small financial investment in their company. The amount of the investment would not be material to me. Can I proceed?**

**A: You may not make this investment, even if the amount of the investment is not a significant amount of money to you. As an account manager for the customer, you are in a position to influence the success of the company, and your personal financial stake could cause you to make decisions that favor your investment to the detriment of Lubrizol.**

**Table 1.1**

## When Disclosure Is Required

You make or influence decisions regarding a customer or supplier that employs, or is owned by, a family member or close personal friend. The disclosure is required even if the family member or friend is not involved in any business dealings with Lubrizol.

You have a family member or close personal friend who works for or owns a Lubrizol competitor.

You are a supervisor and become involved in a close personal or romantic relationship with a person who reports through your management chain.

You develop an outside interest or personal relationship that has the potential to create a conflict of interest or the appearance of a conflict of interest.

**Table 1.2**

## When Prior Approval Is Required

Before accepting outside employment with:

- A competitor, customer or supplier;
- Another company in the chemical industry;
- A company engaged in a business related to goods or services sold or purchased by Lubrizol; or
- A company that wants to hire you to use the same specialized knowledge or skills you use in your work for Lubrizol.

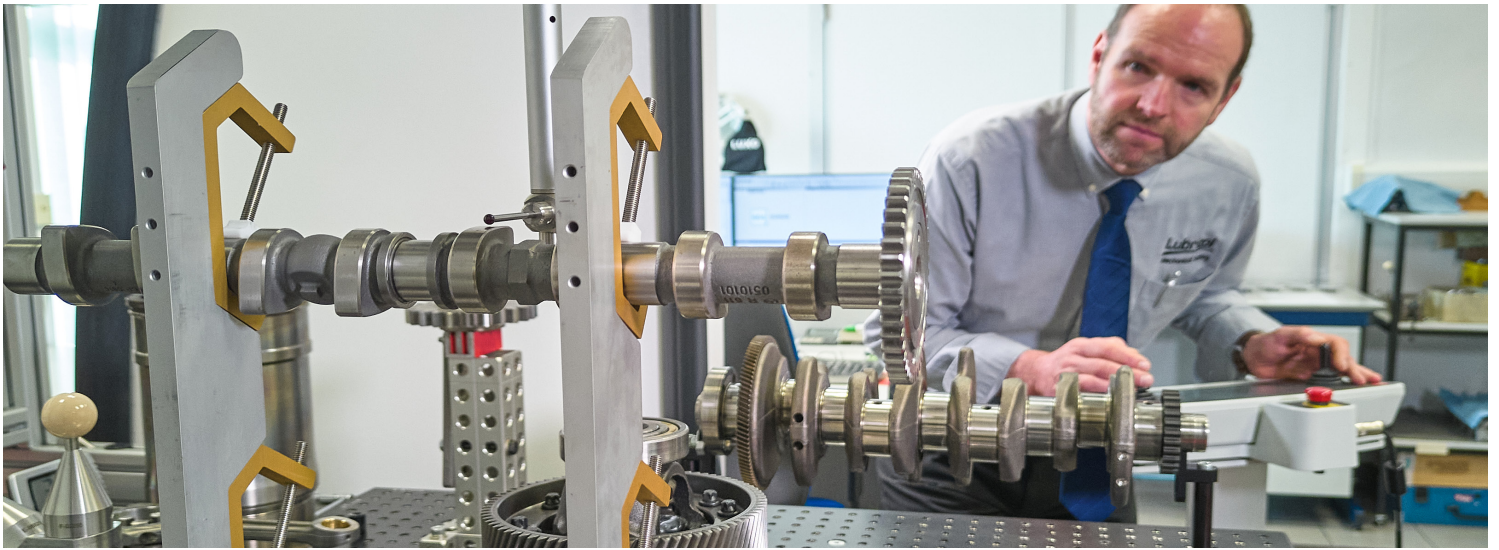
Before engaging in a business of your own that might compete with Lubrizol or a Lubrizol customer or supplier or that is related to goods or services sold or purchased by Lubrizol.

Before making a material financial investment in a business that does or seeks to do business with Lubrizol or that competes with Lubrizol.

A “material financial investment” is one that causes you to have a significant stake in the success of the business.

No approval is required for the acquisition of publicly traded stock.

Before agreeing to serve as a consulting or testifying expert witness, contact the legal team.



## Accurate and complete records

Lubrizol's commitment to integrity requires that documentation for each Lubrizol transaction be accurate and complete, and the accounting books and records of the business fairly and accurately reflect such transactions. This requirement applies to any type of record or report created for Lubrizol, in written or electronic form.

This is not an exhaustive list, but some examples of business records include:

- Commercial – records of procurement, sales and supply chain activity;
- Finance – records of income, expenses and taxes;
- HSES – records of environmental monitoring inspections, security and occupational health operations, product data sheets and placarding;
- Human resources – records of employee pay, time worked and vacation; and
- Operations – records of equipment function, maintenance and other plant operations, lab and testing data, and research and development records.

Creating a business record knowing that it contains incorrect information or leaves out important information is falsification, which is a serious violation of the Code.

Falsification can take many forms. Some examples include:

- Signing for another person without their permission;
- Confirming that an event occurred when it did not;
- Changing the numbers in a test report without data to support the change;
- Misrepresenting the creation date of a document;
- Misreporting hours worked on a timesheet; or
- Setting up a distributor as a customer to avoid the business partner review process.

## Our accountability and commitment to accurate and complete records:

- *We ensure all records and reports that we create or approve are complete and accurate.*
- *We ask questions if we are not sure the record is the way it should be.*
- *We speak up if we believe a record or report has been falsified.*

## FAQ

**Q: My supervisor told me to sign off on a batch sheet confirming that all required tests were done, even though I know some of the tests were not completed. Is it OK to do this if I am acting at the direction of a supervisor?**

**A:** No. It is never appropriate to sign or approve a business record that you know is incorrect. It is also a violation of the Code for your supervisor to direct you to approve the record if your supervisor is aware that the record is not correct. You should discuss your concern with your supervisor. There may be a misunderstanding that can be explained. If you do not feel this is an option, report your concern to your local ethics leader or the corporate ethics office so it can be resolved.

**Q: We have identified a new distributor for a territory where we have struggled to find a reliable business partner. We would like to do business with them on a “trial basis” to see if they will be able to meet our requirements. To do this, we would like to set them up as a customer at first and then later request approval to make them a distributor under our Business Partner Review Policy. Is there any problem with this?**

**A:** This is a problem. Under Lubrizol’s Business Partner Review Policy, you must ensure all sales intermediaries that you engage for Lubrizol—including distributors—complete a background check and ethics training *before* Lubrizol does any business with them. This is extremely important because a distributor is representing Lubrizol in the marketplace. The business partner review process is designed to make sure that the distributor does not have a history of ethical or legal violations and the distributor understands Lubrizol’s requirements when acting as its representative. If you knowingly classify a distributor as a customer, even for what may appear to be a good business reason, you falsify a business record, and violate the Code and the Business Partner Review Policy.



## Relationships with others

Lubrizol values its relationships with customers, suppliers and other stakeholders and insists on business practices that are legitimate, honest and open. By insisting upon honesty and integrity in its dealings with others, Lubrizol develops the strong and trusting relationships that are essential to achieving its business objectives.

Detailed here are policies and rules about Lubrizol's relationships with others.



### Gifts, entertainment, travel and solicitations

Under the right circumstances, giving or receiving a modest gift, sharing a meal or attending a function with business associates can be a thoughtful way to express appreciation and can help to strengthen Lubrizol's relationships with others. However, care must be taken to ensure that anything to be offered or received on behalf of Lubrizol is appropriate.

The policy provided here is intended to outline how to make decisions about what is appropriate and when prior approval is required. ***It is important to note that additional requirements apply when dealing with government officials.*** For additional information, refer to [Tables 1.3, 1.4 and 1.5](#) in "Gifts, entertainment or travel offered to government officials." You should contact the corporate ethics office for guidance if you are ever unsure about these requirements.

Veillez consulter les tableaux 1.3, 1.4 et 1.5 à la fin de cette section pour un résumé des déclarations et approbations requises.





## Gifts

A gift is anything of value that is given as a result of a business relationship for which the recipient does not pay fair market value. A gift may take many forms including:

- Goods or services;
- Discounts or sponsorships generally not available to others;
- Personal favors;
- Prizes won at a conference or trade show; and
- An honorarium for speaking at a conference.

Tickets are generally considered part of entertainment rather than a gift. Occasionally, however, tickets (for example, to a sporting event or concert) are offered with no expectation that the giver will interact with the recipient at the activity or will attend the event at all. If tickets are offered under these circumstances, they may be accepted if they meet the criteria for a gift. Tickets should be evaluated based on the fair market value, not the face value.



### **No cash**

*Under no circumstances may you offer or accept a gift of cash. This includes a cash award for contributing an article to a publication or making a presentation at a conference. Cash equivalents like Visa® gift cards also are prohibited.*

For a gift to be acceptable to offer or receive, it must meet **all** of the following criteria:

- Is not cash or a cash equivalent;
- Is consistent with customary business practices;
- Is not excessive in value;
- Cannot be construed as a bribe or kickback; and
- Does not violate any laws.

If a gift having an excessive value is offered, but local customs or other circumstances make it very difficult or offensive not to accept, you may accept the gift but must immediately report it to the corporate ethics office.

Veillez consulter les tableaux 1.3, 1.4 et 1.5 à la fin de cette section pour un résumé des déclarations et approbations requises.

## Entertainment

Entertainment is an activity or event that is attended by both the host and the guest in connection with a business relationship. (If the host will not attend with the guest it is a gift and the rules for gifts must be followed.) Some examples of entertainment include a meal, a concert, a sporting event or a golf outing.

Entertainment may be offered or accepted when it:

- Has a legitimate business purpose;
- Is not extravagant;
- Is consistent with customary business practices;
- Is not offensive or sexually oriented; and
- Does not violate any laws (such as could be the case when government officials are involved).

Good judgment must be exercised at all times.

## Travel

Under some limited circumstances it is appropriate to offer or accept transportation, lodging and some other related travel accommodations.

Travel expenses may be offered or accepted if they are:

- In connection with a business meeting, conference, product demonstration, training or similar event;
- Not extravagant;
- Pre-approved by the employee's supervisor;
- Pre-approved by the employer of the other party (if Lubrizol is hosting the event); and
- Pre-approved by the corporate ethics office.

## No bribery or kickbacks, ever

A bribe is anything of value—such as money, a gift, entertainment, travel or a favor—offered with the intent to improperly influence a decision or obtain or maintain a business advantage. A kickback is a reward paid by one party to another in return for making or supporting a particular business arrangement. Bribes and kickbacks are strictly prohibited. In addition, 'facilitation payments,' which are described in [Table 1.4](#), are also prohibited. All requests for bribes, kickbacks or facilitation payments must be immediately reported to the corporate ethics office.



### **The problem with solicitations**

*When you request something of value from another party, the other party may expect that the favor will be returned, such as by offering lower prices or better terms. All business decisions must be based on what is in Lubrizol's best interest and not influenced by any pressure to return a favor.*

## **Solicitations**

In connection with work for Lubrizol, you may not solicit gifts, entertainment, travel or personal favors from customers, suppliers or other parties doing business with Lubrizol. A personal favor can be just about anything, like a request for employment for a family member, a donation to a personal charity or help with a university admission. If a customer or supplier solicits a gift, entertainment, travel or a personal favor (outside of an ordinary courtesy) from you for any reason, prior approval from the corporate ethics office is required before granting the request.

### **Our accountability and commitment to Lubrizol's policies on relationships with others:**

- *We offer and accept only appropriate gifts, entertainment and travel as required by the policies set out in the Code.*
- *We know that cash can never be given or received as a gift.*
- *We do not offer or accept any gift, entertainment or travel if it could compromise or appear to compromise a business decision.*
- *We do not solicit gifts, entertainment or travel from Lubrizol partners, customers, or suppliers, or accept personal favors (outside of an ordinary courtesy).*
- *We do not offer or accept bribes or kickbacks, or make facilitation payments.*
- *We seek prior approval from the corporate ethics office when required.*

**Q: How do I determine when a gift has an “excessive” value?**

**A:** There is no specific monetary threshold to determine whether a gift is excessive. In addition to the purchase price and fair market value, relevant factors may include the occasion for the gift, local customs, whether the gift is for someone’s personal use and whether the gift has been altered in a way that increases or decreases its value (for example, contains an inscription or company logo). Contact the corporate ethics office if you have any questions about a gift. Remember, prior approval is required if the gift is being given to a government official as outlined in [Tables 1.3, 1.4 and 1.5](#).

**Q: A supplier gave me 4 tickets to an upcoming event but is not attending. Can I accept them?**

**A:** Since the supplier is not attending the event, the tickets may be accepted if they meet the criteria for a gift. In determining the value, you must consider the market value of the tickets, which may be substantially more than the cost stated on the face of the tickets.

**Q: I mentioned to my contact at a supplier that my daughter had recently applied for a job with the supplier. I was not expecting my contact to take any action, but a few days after making the comment I learned that the supplier offered my daughter a position. Did I make a mistake when I made the comment?**

**A:** Sometimes comments that are not intended as a solicitation can be heard by the other party as one. When you interact with contacts at Lubrizol partners, customers, or suppliers, you should be very careful of what you say and how your comments may be interpreted. In this situation, it would have been better to have not said anything about your daughter’s application. You should clarify with the supplier’s employee that Lubrizol strictly prohibits solicitations and that your remarks were not intended to cause any action on the part of the supplier with regard to your daughter’s application.

**Q: A customer sent us a letter requesting donations for an annual dinner that it will be hosting for employees. The letter states that the donated items will be raffled to employees. Can we give the customer anything for this program?**

**A:** Customer requests for donations are considered solicitations, so prior approval of the corporate ethics office is required before you may donate anything on behalf of Lubrizol in response to the letter.

**Q: After conclusion of an extensive project with a Lubrizol business partner, the company provided me with an elaborate basket of various fresh fruit, vegetables, cheese, crackers, and chocolate. Can I accept it?**

**A:** You can accept the gift and should place it in a common area to share with your co-workers.

# Gifts, entertainment or travel offered to government officials

Lubrizol has specific requirements that apply to offering gifts and entertainment to government officials. You must strictly follow the rules, which are outlined here in Tables 1.3, 1.4 and 1.5, whenever you are working on Lubrizol's behalf.

Table 1.3

Officials in the United States	
<b>Prior approval required</b>	<b>U.S. state or other non-federal government officials</b> Approval of the corporate ethics office is required before offering any gifts, entertainment or travel to U.S. state or other non-federal officials.
<b>Prohibited</b>	<b>U.S. federal government</b> Gifts, entertainment or travel, even those of nominal value, may not be offered to any U.S. federal government official or employee.

Table 1.5

Officials in countries other than the United States	
<b>Prior approval required</b>	<b>Non-U.S. government officials</b> Offering gifts, entertainment or travel to a non-U.S. government official for legitimate business purposes may sometimes be permitted if legal under local law, reasonable in value and customary in the trade, and if the gift or entertainment would not cause, or appear to cause, the government official to be obligated to make any particular decision. However, to avoid even the appearance of impropriety, approval must be obtained from the corporate ethics office or as explained in the local gifts and entertainment policies on the Ethics page on Lubrizol News before offering anything of value to a non-U.S. government official, including gifts, entertainment or travel.
	<b>Employees of state-owned or controlled enterprises</b> In many countries, businesses are owned in whole or in part by the government. All employees of these businesses are considered government officials for purposes of the Code, and gifts, entertainment or travel offered to them are subject to prior approval of the corporate ethics office or as explained in the local gifts and entertainment policies on the Ethics page on Lubrizol News.
	<b>Local gifts and entertainment policies</b> The corporate ethics office may issue guidance relating to gifts and entertainment of non-U.S. government officials in a specific country or region, which may permit regional management to issue approvals for gifts and entertainment with a value below a certain threshold. These documents are available on the Ethics page on Lubrizol News.

Table 1.4

Officials anywhere in the world	
<b>Prior approval required</b>	<b>Political contributions</b> Lubrizol will not make contributions to political parties, candidates or public officials, except as permitted by law. Any contribution of Lubrizol funds to a party, candidate or public official must be approved in advance by the corporate ethics office.
<b>Prohibited</b>	<b>Facilitation payments</b> Facilitation payments are small unofficial payments made to expedite or secure a routine government action. Lubrizol prohibits all facilitation payments. All requests for facilitation payments must be immediately reported to the corporate ethics office.

As a reminder, entertainment under the Code includes a meal, a concert, a sporting event, a golf outing or a similar activity.



### **What is competitive intelligence?**

*Competitive intelligence is information about competitors, including their pricing and product information, that helps Lubrizol maintain a competitive advantage in a dynamic marketplace. Collecting competitive intelligence is an important commercial practice, and it must be done ethically.*

## Competitive intelligence

Lubrizol's commitment to ethical business practices means that we collect competitive intelligence in the right way. Below are the rules that must be followed when collecting competitive intelligence.

### **Basic rules**

You may only use ethical practices to obtain competitive intelligence. Using theft, deception, bribery or other surreptitious means to obtain competitive intelligence is strictly prohibited at Lubrizol.

- Customers and suppliers may be asked if there is any information about competitors they are free to share. You also may ask for samples of commercially available competitive materials. When making the request, you must always confirm that the customer or supplier has no restriction on its ability to share the information or sample with Lubrizol. A restriction could arise from a secrecy agreement that the customer or supplier may have with the competitor or a company policy that prohibits the sharing of competitive intelligence. You must respect these obligations. If the customer or supplier expresses any doubts or reservations about their ability to share the information or sample, it must be declined.
- Consultants may be engaged to obtain competitive intelligence for Lubrizol. When you engage consultants, they must be informed that they may only use ethical practices when obtaining the information. Consultants may not do anything that Lubrizol employees may not do to collect intelligence.



### **Circumstances requiring special caution**

You should use special caution if you receive a document that is marked confidential or appears to contain confidential information of a competitor. In these situations, you must ask the person providing the information to clearly and unequivocally confirm there is no secrecy obligation in place with the competitor that prohibits the sharing of the document with Lubrizol. If the person provides this confirmation, you may accept the document, but it must be immediately taken to the legal team for review before any use of the information or sharing of the document with others at Lubrizol. You must refuse competitive intelligence if you have any reason to believe that:

- The person offering the information is expecting compensation or a favor in return for the intelligence;
- The person offering the information is not free to share it; or
- The information was obtained through unlawful or unethical practices.

### **Competitors**

You must never contact a competitor directly for competitive intelligence because the exchange of competitively sensitive information between competitors can create the appearance of an improper agreement. The only exception to this rule is for samples. Samples may be obtained directly from a competitor, such as may occur when Lubrizol is evaluating the use of a competitor's product in a formulation. Lubrizol's procurement team is in the best position to request these samples. Lubrizol employees who are involved in sales may not be involved in contacting a competitor for a sample without prior approval from the legal team.

#### **Our accountability and commitment to gather competitive intelligence the right way:**

- *We only use ethical practices to obtain competitive intelligence.*
- *We use special caution and make further inquiries regarding any document marked confidential or that appears to contain a competitor's confidential information.*
- *We refuse to accept competitive intelligence that cannot be freely shared, was unlawfully obtained, or for which compensation in return is expected.*
- *We never contact a competitor directly for competitive intelligence, except for samples as set out in the rules of this section of the Code.*

**Q: During a recent sales call, a customer gave me the price list of a competitor. The price list is marked “confidential.” When I asked the customer about it, he told me that they have no secrecy agreement with the competitor and the price list was sent to them through a mass mailing. Can I accept the information?**

**A: Yes.** Marking a document “confidential” does not necessarily mean it is confidential. Given the customer’s assurance that there is no secrecy agreement that prohibits the sharing of the price list, you may accept it, but before using the information or sharing the document with others at Lubrizol, take it to the legal team immediately for final evaluation.

**Q: I work in the lab. We recently received a sample of a competitive product, but the container does not have a label and there is no safety data sheet for the material. A co-worker told me he got the sample from a friend who works at another chemical company and not to worry about it. Is this a problem?**

**A: Yes.** The sample presents a serious safety concern. Every product in a Lubrizol laboratory must be properly labeled and have a safety data sheet. The absence of a label also raises questions about how the sample was obtained and whether proper practices were used to get it. You need to contact local safety personnel to determine how to dispose of the sample. In addition, report the matter to an ethics office resource to determine if additional action is necessary.

**Q: Am I allowed to analyze samples of competitive products?**

**A: You may analyze samples of commercially available products, so long as the samples were obtained properly according to the Code. You may not analyze samples of competitive products that are *not* commercially available without prior approval of the legal team.**





## Complying with laws and other obligations

Being a highly ethical company means that Lubrizol complies with laws wherever it operates and fulfills other legal commitments that it makes. A failure in this area may result in substantial fines and penalties, business interruption, or worse—loss of reputation and trust with customers and other stakeholders who rely on Lubrizol products, services and solutions.



### Complying with laws

There are many laws around the world that apply to Lubrizol's activities and all are important. Please refer to the Compliance Section of the Legal page on Lubrizol News for information on how to comply with anti-corruption laws, trade regulations, and competition laws. Available resources include Lubrizol's [Prohibited Business Practices Policy](#), which outlines the obligations of Lubrizol employees and Lubrizol partners to comply with applicable laws.

### Respecting others' intellectual property and complying with secrecy obligations

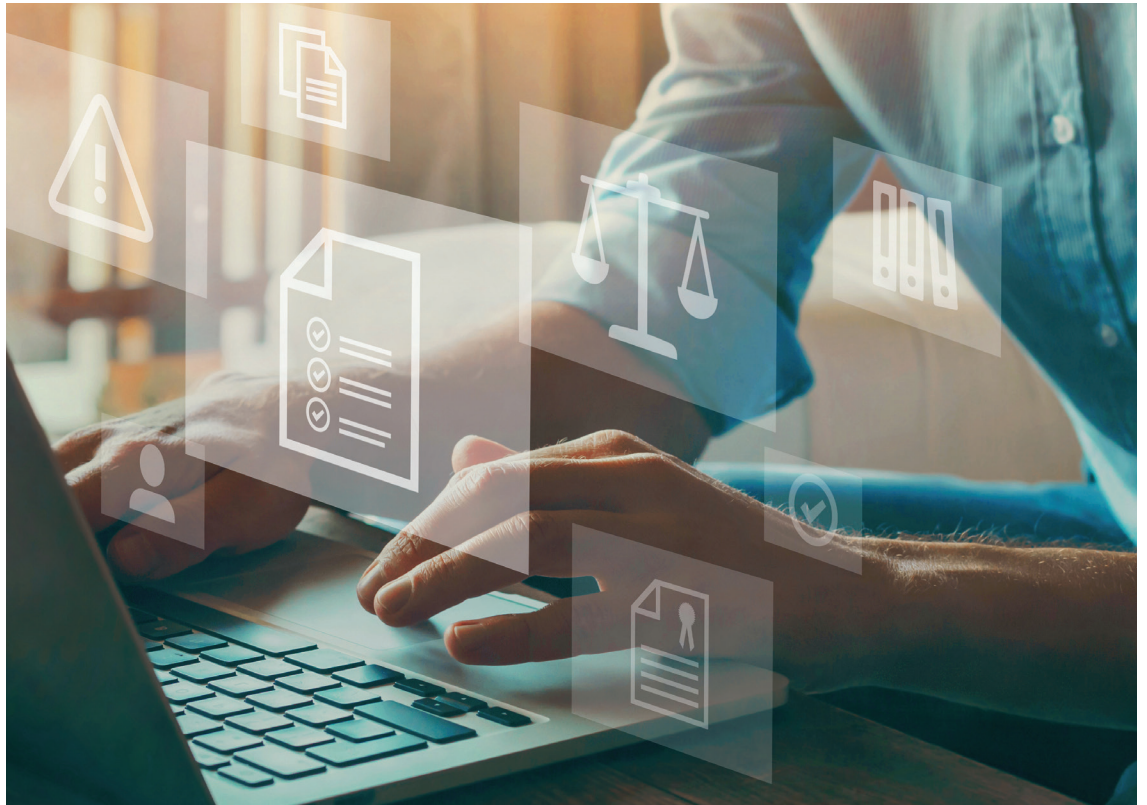
Intellectual property includes trademarks, patents, copyrights and logos. Lubrizol does not use intellectual property belonging to others without their permission. If Lubrizol has signed a secrecy agreement with another party under which it has received confidential information, it complies with the obligations under that agreement.

Lubrizol also requires that employees fulfill any obligations that they may have to former employers, including secrecy obligations. Lubrizol will not use the information of former employers without their permission.



### **Obligations to former employers**

*Just as a document created for Lubrizol is an asset that belongs to Lubrizol, documents created for your former employer belong to that employer. Without your former employer's express permission, you are not permitted to use documents that belong to or were created for that employer, even if the document does not contain confidential information.*



## **FAQ**

**Q: Where can I find more information about complying with the competition laws?**

**A:** You can go to the Compliance Section of the Legal page on Lubrizol News, which has resources on complying with the competition laws.

**Q: I created a survey for a former employer. It does not contain any information about my former employer, confidential or otherwise. It is just a series of questions. Can I use it in my work for Lubrizol?**

**A:** No. This survey is the property of your former employer. It may not be used for Lubrizol without your former employer's express permission.

**Q: I am developing a presentation for an important customer, and I would like to include a picture of its logo in the presentation. Is this OK?**

**A:** The logo may not be used without the customer's permission. You should contact the customer ahead of time to ask whether it would be OK to use its logo in the presentation.



We must continue to **measure every act** against not only what is legal but also what we would be happy to have written about on the front page of a national newspaper in an article written by an unfriendly but intelligent reporter.

– *Warren Buffett*

## Ethical decision-making

When is something an ethics issue? You are not alone if you struggle to answer this question. Many issues that are or could become ethics concerns are addressed in the Code. However, the Code cannot cover every situation. For this reason, you are expected to act with honesty and integrity in all situations, treat everyone with dignity and respect and always use good judgment in the work you do for Lubrizol.



While we all strive to do the right thing, what is right may not always be readily apparent. If you are uncertain whether your actions are proper, ask yourself these questions.

- What would my supervisor, co-workers or family think of my actions?
- Would I behave differently if I knew my actions would be reported in the news?
- Am I treating others as I would like to be treated?

If you have any doubts, ask for help before proceeding. If the threat of public scrutiny makes you uncomfortable, then your conscience is saying something important. Pay attention. You may be struggling with something that could tarnish a reputation—yours or Lubrizol's.



## Resources

Corporate ethics office	<a href="mailto:ethics@lubrizol.com">ethics@lubrizol.com</a> or 1-440-347-5000	
Local ethics leaders	Refer to the Ethics page on Lubrizol News	
Ethics hotline (NAVEX web reporting)	<a href="https://www.brk-hotline.com">https://www.brk-hotline.com</a>	
Ethics hotline (NAVEX telephone reporting)	U.S. and Canada	1-800-261-8651
<b>International toll-free when using an outside line</b>	Brazil	0800-892-1909
	China	10-800-110-0669
	China	10-800-711-0728
	France	0800-91-5504
	Germany	0800-186-0191
	Singapore	800-1101-981
	UK	0808-234-0033
<b>Direct access when using an outside line</b>	Australia (Optus)	1-800-551-155
	Australia (Telstra)	1-800-881-011
<i>*When prompted in English, dial: 800-781-6271</i>	Belgium	0-800-100-10
	India	000-117
	Italy	800-172-444
	Japan (NTT)	0034-811-001
	Japan (KDDI)	00-539-111
	Japan (Softbank Telecom)	00-663-5111
	Korea (South) (Dacom)	00-309-11
	Korea (South) (ONSE)	00-369-11
	Korea (South) (Korea Telecom)	00-729-11
	Luxembourg	800-201-11
	Malaysia	1-800-80-0011
	Mexico	01-800-288-2872
	Netherlands	0800-022-9111
	Romania (Telekom Romania)	0808-03-4288
	Saudi Arabia	1-800-10
	South Africa	0-800-99-0123
	Spain	900-99-0011
Country not listed?	<a href="https://www.brk-hotline.com">https://www.brk-hotline.com</a>	
Employee relations office	<a href="mailto:employeerelations@lubrizol.com">employeerelations@lubrizol.com</a> or 1-440-347-5937	
Legal team	1-440-347-5108	
Sustainability	<a href="mailto:inspiringsustainability@lubrizol.com">inspiringsustainability@lubrizol.com</a>	

For reports made through the ethics hotline, after you complete your report you will be assigned a unique code called a "report key". Write down your report key and password and keep them in a safe place. After 5 - 6 business days, use your report key and password to check your report for feedback or questions.



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