



Lubrizol Supplier Code of Conduct

At Lubrizol, we strive to do the right things the right way. We believe that acting with honesty and integrity is critical to our long-term success. This philosophy was first articulated over 80 years ago by the founders of Lubrizol and is as important today as it was then.

Our commitment to ethical and legal conduct is fundamental to our relationships with suppliers. By acting with honesty and integrity, we believe that we can build the strong supply relationships that allow us to provide superior products and outstanding service to our customers. We take steps - like this letter - to ensure that we are establishing relationships with companies that share our commitment to the highest ethical standards. Failure by a supplier to conduct its activities in a manner consistent with Lubrizol's Code of Ethics will jeopardize the supplier's business with us.

The full text of our Code is available on our website, www.lubrizol.com, at [Ethics](#), our Company/Ethics portion of the site. While we encourage you to review the Code in its entirety, here is a summary of several key areas related to our relationships with our suppliers:

- **Gifts and Entertainment** – Lubrizol has strict policies regarding the offering and accepting of gifts. Employees may not accept any benefit from a supplier or potential supplier that might compromise – or even appear to compromise – their objective assessment of the supplier's offering. Therefore, we ask that you refrain from sending gifts to our employees. Business entertainment is allowed so long as it is reasonable and appropriate for the occasion and has a legitimate business purpose. These rules do not change during a holiday season.
- **Conflicts of Interest** – We strive to ensure that contracts are awarded based only on legitimate factors like price, quality, service and supply capabilities. Employees must avoid personal conflicts of interest that may interfere with their ability to make appropriate purchasing decisions. We ask that you contact us should you become aware of any conflict of interest of a Lubrizol employee with responsibility for making purchasing decisions.
- **Health and Safety** – At Lubrizol, we are committed to maintaining the health and safety of our employees, customers and neighbors and to protecting the environment. Suppliers who do business with Lubrizol are expected to share this commitment.
- **Employment Practices** – Lubrizol insists on a work environment that is free from illegal discrimination and harassment. We support fundamental human rights for all people and expect our suppliers to do the same. Our suppliers must be committed to a workplace that is free from all forms of human trafficking, forced labor and unlawful child labor in their operations. If we determine there is a need to conduct an audit to confirm a supplier's compliance with this requirement, we expect full and timely cooperation.

- **Compliance with Competition Laws** – Those purchasing goods in the marketplace should be able to select from a variety of products at competitive prices that are unrestricted by artificial restraints such as price fixing, illegal monopolies, group boycotts and tying. Lubrizol has no tolerance for suppliers who engage in practices such as these, or in any practice that violates competition laws.
- **Bribes/Kickbacks** – Lubrizol prohibits its employees and anyone acting on its behalf (such as agents, consultants and contractors) from offering or receiving any form of bribe or kickback. Bribes and kickbacks are contrary to Lubrizol's commitment to honesty and integrity. Lubrizol expects that its suppliers will not offer or receive bribes or kickbacks.
- **Financial Transactions** –Lubrizol insists that all of its financial transactions are accurately recorded in our books and records. All invoices submitted to Lubrizol must be in writing with sufficient and accurate descriptions of all goods and services provided, and applicable charges.
- **Conflict Minerals** – We are committed to complying with laws relating to conflict minerals. Suppliers who do business with Lubrizol must disclose their use and sourcing of any conflict minerals in products supplied to Lubrizol.

We ask that you make certain the contents of this letter are shared with those in your organization who have contact with Lubrizol employees and/or work at Lubrizol facilities. We also ask that you respond to SustainableSourcing@Lubrizol.com with confirmation of receipt and understanding of this Code of Conduct.

Please do not hesitate to contact us should you have any questions or concerns related to this letter. Questions or concerns may also be submitted to Navex Global, an independent firm that provides hotline reporting services to Lubrizol. Contact information for Navex Global can be found on our website, www.lubrizol.com, at [Ethics](#).

We appreciate your attention to this letter.

Yours sincerely,

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