

▶ Supplier Code  
of Conduct

***Lubrizol***

## Supplier Code of Conduct

The Lubrizol Corporation Supplier Code of Conduct (“Code”) defines our standards for fair business interactions, safe and healthy working conditions and environmental responsibility throughout our supply chain.

Since the foundation of our company in 1928, we have operated under the strong values articulated in our corporate philosophy. Those values state that in addition to improving lives by making our customers’ products better, we also strive to conduct business responsibly. We understand that to meet the current needs of all our stakeholders, we must maximize our environmental and societal performance as well as our economic performance.

Our actions reflect this commitment. All of our facilities adhere to the highest-global environmental and safety standards, including the American Chemistry Council’s global Responsible Care© initiative. We work closely with our customers to provide products and services that help them to achieve their environmental performance goals. Where appropriate, we conduct life cycle assessment on products to help us understand and assess their environmental impact, and we embrace a commitment to ethical and legal behavior in all aspects of our business.

As a responsible corporation, we only work with suppliers that actively support these same principles. We have adopted this Supplier Code of Conduct to ensure that suppliers understand our expectations. A supplier’s commitment to our Code will be an important factor in Lubrizol’s decision to award or continue business.



Mark Buescher  
Vice President, Procurement

## Business Conduct & Ethics

At Lubrizol, honesty and integrity are our guiding principles. We expect our suppliers to share this commitment.

### Fair Competition

Suppliers are expected to compete fairly and ethically and must operate in compliance with all antitrust and competition laws.

### Confidentiality

Suppliers are expected to respect intellectual property rights of third parties, and must not use or disclose confidential information of others in violation of legal or contractual obligations.

### 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.

### Gifts and Entertainment

When offering gifts and entertainment to Lubrizol employees, suppliers are expected to follow Lubrizol policies. Suppliers must not offer anything that might compromise – or even appear to compromise – an objective assessment of the supplier's offering. Cash gifts of any amount are prohibited. This includes cash equivalents such as prepaid Visa gift cards. Business entertainment is allowed if 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 commercial factors like price, quality, service and supply capabilities. Suppliers must notify us if they become aware that a Lubrizol employee has a personal activity, interest or relationship that may interfere with their objectivity when making decisions for Lubrizol.

### Bribes/Kickbacks

We prohibit bribery in all aspects of our activities and in our supply chain. Suppliers must not offer or receive bribes or kickbacks.

### Financial Transactions

We are committed to ensuring that all financial transactions are accurately recorded in our books and records. All invoices submitted to Lubrizol must sufficiently and accurately describe all goods and services provided, and applicable charges.

## Human Rights & Labor

At Lubrizol, we treat each other with respect and dignity and we hold our suppliers to the same standard. Suppliers must comply with all applicable laws regarding employment, wage and labor rights.

### Discrimination

We support fundamental human rights for all people and expect our suppliers to do the same.

Suppliers are expected to have a work environment that is free from any form of discrimination and harassment. This includes harassment or discrimination on the basis of race, color, religion, sex, gender identity, national origin, age, marital status, military service, disability, sexual orientation, genetic information, citizenship, or social or economic status.

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### Prevention of Child Labor and Forced Labor

Suppliers must provide a workplace that is free from all forms of human trafficking, forced labor and child labor in their operations. Suppliers must ensure that workers' contracts clearly convey the conditions of employment in a language understood by the workers.

### Wages and Benefits

Suppliers are expected to pay their employees a living wage. Suppliers must meet all legal requirements relating to wages, benefits and compensation to employees.

### Working Hours

Suppliers must comply with all applicable laws and regulations with respect to working hours, overtime and days of rest.

### Freedom of Association and Collective Bargaining

Suppliers must respect an employee's lawful rights to associate with others to form and/or join an organization of their choice and bargain collectively, without interference, harassment, or retaliation. This includes the right for employees to communicate openly with management regarding working conditions without fear of retaliation.

## Health, Safety & Well-being of Employees

At Lubrizol, employee health, safety, and well-being are fundamental to our success. Suppliers are expected to have implemented effective health and safety management practices within their business.

### Well-being of Employees

All employees should be able to perform their duties in a safe and hygienic working environment. Suppliers are expected to provide a working environment that ensures the safety and quality of health of its employees. This includes having safety procedures in place and providing appropriate personal protective equipment to minimize the risk of accident or injury.

### Safety Training

Suppliers are expected to provide necessary occupational health and safety training and to implement processes to prevent catastrophic events. This includes conveying information to identify potential emergency situations and providing safety and health information related to hazardous materials. It is also necessary to ensure that health and safety programs are consistent for contractors and subcontractors working at suppliers' facilities.

### Incident Management

Suppliers are expected to have systems for employees to report health and safety incidents, as well as managing and tracking reports of incidents. Such incidents are required to have corrective action plans to mitigate potential risks. Suppliers must provide necessary medical treatment and facilitate workers' return to work.

### Operating Permits and Licenses

Suppliers must comply with all applicable laws and regulations with respect to the health and safety of employees. Suppliers also must have all permits and licenses required to operate.

### **Sustainability & Environmental Responsibility**

At Lubrizol, we strive to understand the potential impact of our operations and products on the planet, and we are dedicated to minimizing our corporate footprint through many efforts including our supply chain.

#### **Respect for the Environment**

Suppliers must comply with all applicable environmental laws, regulations and directives regarding waste, air emissions, hazardous materials, and wastewater discharge; including the manufacture, transportation, storage, disposal, and release to the environment of such materials.

#### **Sustainable Consumption**

Suppliers are expected to use natural resources in an efficient and responsible manner. To minimize or eliminate negative environmental impacts, suppliers are expected to engage in the development of sustainable practices and activities.

#### **Quality and Safety of Products**

Suppliers must ensure products supplied to Lubrizol are manufactured and distributed in accordance with applicable laws. Products also must comply with all applicable quality and safety standards.

#### **Continuous Improvement**

Suppliers are expected to implement appropriate environmental management policies that seek to reduce the environmental impacts of operations. Accordingly, suppliers are expected to continually improve the policies in their own organizations and promote sustainability throughout their value chains.

### **Violation of the Supplier Code of Conduct**

Suppliers must take prompt action to remedy any violation of Lubrizol's Supplier Code of Conduct, as well as other legal requirements applicable to its activities, and to inform Lubrizol if the violation involves goods or services provided to Lubrizol. A violation of this Code, including a failure to promptly take action to remedy or report a violation will jeopardize the supplier's business relationship with Lubrizol. If an audit is necessary to confirm a supplier's compliance with this Code, we require full and timely cooperation.

We ask that you make certain the contents of this Code are shared with those in your organization who have contact with Lubrizol employees and/or work at Lubrizol facilities. We also ask that you share this Code with your employees accountable for your company's relevant policies and work practices.

Please do not hesitate to contact us should you have any questions or concerns related to the Code.

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 at [www.lubrizol.com](http://www.lubrizol.com) in the Our Company/Ethics portion of our website.