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| Policy Name | Anti-Modern Slavery Policy |
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| Classification | Public |
| Notes | Adopted in response to the <i>Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada)</i> |
| Authorized by: | Delegation of Authority to the SVP & General Counsel NOVA Chemicals Corporation |
| Policy Owner: | SVP & General Counsel The Policy Owner is responsible for periodically reviewing and updating this Policy to reflect regulatory, best practice, and business developments. |
| Approver: | In accordance with the Delegation of Authority to the SVP & General Counsel |

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Introduction:

Corporate integrity, responsible product sourcing, and the safety and well-being of workers across the global supply chain are of paramount importance to NOVA Chemicals Corporation and its affiliates (“NOVA Chemicals”). Modern Slavery, including forced labour and child labour, are crimes and violations of fundamental human rights.

As proud participants in the United Nations Global Compact, we recognize and respect human rights. NOVA Chemicals has a zero-tolerance approach to Modern Slavery, and we are committed to acting ethically and with integrity in all business dealings and relationships. We have also implemented and will enforce effective systems and controls to ensure Modern Slavery is not taking place anywhere in NOVA Chemicals’ business or in its supply chains.

Scope:

This Anti-Modern Slavery Policy (the “**Policy**”) applies to all persons working for or on behalf of NOVA Chemicals in any capacity regardless of location or role, including (but not limited to) employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, subcontractors, external consultants, third-party representatives, supply chain participants and business partners.

Please read this Policy carefully and openly and make every effort to understand the importance of preventing Modern Slavery and the ways we can strive to accomplish these objectives together.

Companies and contractors with which NOVA Chemicals does business are expected to adopt this Policy or have and enforce a policy which meets or exceeds the requirements of this Policy.

This Policy is to be read in conjunction with NOVA Chemicals’ Business Conduct Policy, Supplier Code of Conduct, Business Partner Due Diligence Policy, Sustainable Procurement Policy, and any additional requirements in those documents must also be followed.

Definitions:

For the purposes of this Policy, the following terms have the following meanings:

Act means the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada).

Child Labour means labour or services provided or offered to be provided by persons under the age of 18 years and that:

- are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada;
- are provided or offered to be provided under circumstances that are mentally, physically, socially, or morally dangerous to them;
- interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work; or

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- constitute the worst forms of child labour as defined in article 3 of the *Worst Forms of Child Labour Convention*, 1999, adopted at Geneva on June 17, 1999 or child labour under any other applicable law.

Forced Labour means labour or service provided or offered to be provided by a person under circumstances that:

- could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service; or
- constitute forced or compulsory labour as defined in article 2 of the *Forced Labour Convention*, 1930, adopted in Geneva on June 28, 1930, or that constitute forced labour under any other applicable law.

Modern Slavery means collectively Forced Labour and Child Labour.

Examples of Modern Slavery:

Modern Slavery can be found in almost every country in the world. Vulnerable persons such as children, women, workers who have traditionally been discriminated against, migrant workers, workers with uncertain immigration status, and rural workers, and illiterate workers are the most at risk of being exploited through Modern Slavery.

Some examples of Modern Slavery include, but are not limited to:

- human trafficking;
- debt bondage and exploitative labour contracts;
- sale or exploitation of people;
- debt-induced forced labour;
- forced labour in prisons; and
- coercion or deception in employment.

Objective:

This Policy sets out NOVA Chemicals' commitment to:

- (a) responsibly source goods or services to use in its business;
- (b) ensure there is transparency the approach to tackling Modern Slavery in NOVA Chemicals' business and throughout its supply chains;
- (c) take action to prevent, mitigate and where appropriate, remediate the harm caused by Modern Slavery occurring in NOVA Chemicals' business or supply chains; and
- (d) comply with applicable laws and regulations about Modern Slavery including under the Act.

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NOVA Chemicals' Policy:

It is NOVA Chemicals' policy to strictly prohibit the use of Modern Slavery in its supply chain. It is NOVA Chemicals' policy not to enter a business relationship with any supplier that uses or is suspected of using any form of Modern Slavery at any stage of the production process or at any point in its own supply chain. This includes suppliers who benefit directly or indirectly from Modern Slavery.

NOVA Chemicals continuously assesses the risk of Modern Slavery in its supply chain and undertakes due diligence to ensure that its supply chain is free of Modern Slavery. If NOVA Chemicals suspects that a supplier or any of the supplier's subcontractors or other business partners is using Modern Slavery, NOVA Chemicals will commence an investigation and take corrective actions (including ceasing to do business with the supplier) if NOVA Chemicals concludes that Modern Slavery is in fact being used.

As part of Modern Slavery due diligence, it is NOVA Chemicals' policy to:

- (a) vet new and existing suppliers for Modern Slavery risks in accordance with our Business Partner Due Diligence Policy and through questionnaires, on-site inspections, and other means;
- (b) screen prospective purchases against lists of products and source countries that we believe pose a risk of Modern Slavery;
- (c) conduct audits, which may be announced or unannounced, of suppliers' operations, to be performed by NOVA Chemicals' personnel, third-party auditors, or both;
- (d) require suppliers to acknowledge and adhere to the Supplier Code of Conduct which requires suppliers to:
 - i. ensure that neither they nor their sub-contractors or other supply chain business partners use Modern Slavery at any point in the production process;
 - ii. maintain a reliable system to verify the eligibility of all workers, including age eligibility and the legal status of foreign workers; and
 - iii. promptly report to us any violation of the Supplier Code of Conduct that the supplier becomes aware of, including the use of Modern Slavery at any point in their own supply chain.
- (e) include terms and conditions in contracts and purchase orders that require suppliers to:
 - i. refrain from using of any form of Modern Slavery, including in their own supply chains;
 - ii. conduct due diligence and investigations to ensure there is no Modern Slavery in their own supply chains including maintaining a reliable system to verify the age and legal status of workers;
 - iii. depending upon jurisdiction, certify that merchandise sold to us was not produced or manufactured by Modern Slavery;
 - iv. cooperate with any investigation by NOVA Chemicals into the suspected use of Modern Slavery by the supplier or any of its business partners;
 - v. train their employees and suppliers about Modern Slavery; and
 - vi. agree to consequences for violation of these terms and conditions, including NOVA Chemicals' cancellation of the affected purchase and termination of the contractual relationship with the supplier.

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The due diligence measures and internal controls and procedures regarding Modern Slavery are more fully described in the Sustainable Procurement Policy and Business Partner Due Diligence Policy.

Minimum Modern Slavery Standards:

We expect that all suppliers, contractors, and other business partners will refrain from contributing to, using, or benefitting from Modern Slavery. Additionally, the minimum standards expected of NOVA Chemicals own business, employees, contractors, and direct and indirect suppliers include:

| <u>Prohibited Practices</u> | <u>Required Practices</u> |
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| Charging workers recruitment fees | Using accredited recruitment agencies who do not engage in fraudulent practices |
| Hiring workers who are born or descended into bonded or "slave" status | Workers have the right to resign from employment |
| Retaining workers' identity documents (such as work visas, passports, birth certificates, etc.) | Complying with all applicable employment, labour, human rights, and health and safety laws |
| Requiring workers to lodge deposits or bonds in order to work | Paying at least the minimum wage |
| Underpaying wages or making illegal deductions from wages | Providing transparent pay statements outlining hours worked, rate of pay, and the calculation of legal deductions |
| Assessing fraudulent or excessive charges for travel, health checks, or work documentation | Paying wages directly to workers |
| Substituting a workers' written employment contract (ex. contract of the employer does not match the contract the worker signed in their country) | Providing workers with employment contracts, pay statements, and policies in a language they understand |
| Depriving workers of food, shelter, or other necessities of life | Providing safe drinking water, adequate lighting, temperature, ventilation, and sanitation. |
| Physical abduction, imprisonment, kidnapping, trafficking, sale of workers, or using involuntary prison labour | Workers have freedom of movement and are not physically confined to the workplace or related premises |
| Using physically abusive or humiliating discipline or termination practices such as corporal punishment, mental or physical coercion, verbal abuse, sexual violence, harassment, threats, and intimidation | Treating all workers fairly and equally (regardless of nationality or legal status or other protected grounds). |

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| Making threats against a worker or their family. Threatening to exclude workers from community and social life or future employment opportunities. | Implementing a grievance procedure where workers can raise concerns without fear of retaliation for doing so |
| Induced indebtedness (ex. falsifying accounts, inflated prices, excessive interest charges, etc.). | Vocational training is undertaken voluntarily |
| Compelling workers to use the employers' store or services | Wages are paid regularly in legal tender (not in vouchers, goods in kind, coupons, or promissory notes) |
| Using compulsory overtime or obligation to work as discipline | Scheduling workers for only the legally allowable number of hours (where no such limit exists then for no more than 60 hours a week). |
| Employing people under the age of 18 for hazardous work | Workers are freely allowed to associate with others of choice and seek representation to bargain collectively |

Supplier Standards:

We expect the same high standards from all suppliers, contractors, and other business partners within NOVA Chemicals' supply chains as outlined in the above sections "NOVA Chemicals' Policy" and "Minimum Supply Standards. We expect that suppliers will hold their own suppliers to the same standards.

Roles and Responsibilities:

Preventing, detecting, and reporting Modern Slavery is a shared responsibility between NOVA Chemicals' suppliers, NOVA Chemicals Supervisors and Leadership, the Chief Compliance Officer, NOVA Chemicals' employees. Each has a unique role to play as outlined below.

Suppliers are responsible for:

- (a) ensuring their employees, contractors, and suppliers involved in the supply of goods or services to NOVA Chemicals understand and comply with this Policy;
- (b) training their employees, contractors, and suppliers about the risks of Modern Slavery;
- (c) refraining from directly or indirectly using Modern Slavery;
- (d) refraining from directly or indirectly benefitting from or contributing to Modern Slavery;
- (e) complying with NOVA Chemicals' requests for information about their supply chains and practices such as completing supplier questionnaires, participating in audits, and completing statutory declarations certifying they do not use or benefit from Modern Slavery; and
- (f) reporting any risks of Modern Slavery, they identify in their business or supply chains as described in the reporting mechanism below.

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Senior Leadership is responsible for:

- (a) adhering to all requirements set out below for Supervisors, Leaders, and Employees;
- (b) ensuring this Policy complies with NOVA Chemicals' legal and ethical obligations;
- (c) ensuring that NOVA Chemicals and its supply chains comply with this Policy;
- (d) providing financial and other resources to support the detection and removal of Modern Slavery from NOVA Chemicals' supply chain;
- (e) approving policies and practices that support the detection and removal of Modern Slavery from NOVA Chemicals' supply chain; and
- (f) working with NOVA Chemicals' Board of Directors to obtain the Board's approval of the annual Modern Slavery report in accordance with the Act.

The Chief Compliance Officer is responsible for leading NOVA Chemicals' efforts to remove Modern Slavery from NOVA Chemicals' supply chain and for coordinating with the respective business units of NOVA Chemicals (including Procurement, Human Resources, Finance, and Legal) and shall be responsible for:

- (a) adhering to all requirements set out below for Supervisors, Leaders, and Employees;
- (b) day-to-day responsibility for updating and implementing this Policy, and monitoring its use and effectiveness;
- (c) resolving any questions related to the interpretation of this Policy;
- (d) monitoring and auditing internal controls and procedures, and consulting with relevant stakeholders to identify risks of Modern Slavery practices in NOVA Chemicals' operations, including in NOVA Chemicals' subsidiary organizations;
- (e) monitoring, auditing and consulting with contractors and suppliers to identify risks of Modern Slavery practices in NOVA Chemicals' supply chains;
- (f) developing measures to assess and address any risks of Modern Slavery, including through due diligence and contractual obligations;
- (g) monitoring the effectiveness of those measures;
- (h) developing appropriate training materials and programs for NOVA Chemicals' employees and suppliers to comply with this Policy;
- (i) developing and maintaining remediation programs and grievance mechanisms, if applicable;
- (j) investigating any complaints of breaches of this Policy; and
- (k) preparing the annual Modern Slavery report in accordance with the Act and other applicable laws.

Supervisors and Leaders are responsible for:

- (a) adhering to all requirements set out below for employees;
- (b) ensuring those reporting to them understand and comply with this Policy and are participating in regular training that NOVA Chemicals provides;
- (c) ongoing performance management and evaluation to ensure effectiveness of this Policy;

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- (d) treating allegations of Modern Slavery seriously and refraining from dismissing or downplaying such allegations; and
- (e) refraining from retaliating against anyone who reports Modern Slavery.

Employees and contract workers are responsible for:

- (a) reading and understanding this Policy;
- (b) participating in training about this Policy;
- (c) following this Policy in their day-to-day activities performing work for NOVA Chemicals;
- (d) avoiding any activity that might lead to a potential or actual breach of this Policy or relevant laws relating to Modern Slavery;
- (e) seeking and following advice from their Supervisor, Leader, the Chief Compliance Officer, or the Legal Department if they have a question about Modern Slavery;
- (f) reporting any risks of Modern Slavery, they identify in NOVA Chemicals' business or supply chains as described in the reporting mechanism below;
- (g) notifying the Chief Compliance Officer or the Legal Department immediately of any governmental inquiry or investigation regarding the use of Modern Slavery in NOVA Chemicals' supply chain; and
- (h) co-operating with any investigations about Modern Slavery complaints and concerns.

Awareness and Training:

Suppliers: NOVA Chemicals' commitment to addressing Modern Slavery in its business and supply chains will be communicated to all contractors and supply chain participants at the outset of the business relationship with them and will be reinforced as appropriate thereafter (including by way of obligations included in the supply contract). Suppliers are responsible for ensuring that their workforce is adequately trained about identifying Modern Slavery practices and areas of risk within their own business and supply chain. NOVA Chemicals will also endeavor to provide training on Modern Slavery prohibitions to its direct high-risk suppliers and, to the extent possible, to high-risk suppliers beyond the first tier in the supply chain.

Employees: NOVA Chemicals will provide regular training to employees on this Policy. This will include training on how to identify Modern Slavery practices and the particular parts of NOVA Chemicals' business and supply chains which are subject to a greater risk of Modern Slavery practices. This training will also form part of the onboarding process for all individuals who work for us, whether as an employee or a contractor.

Reporting Non-Compliance:

Everyone is encouraged to raise concerns about any issue or suspicion of Modern Slavery in any parts of NOVA Chemicals' business or supply chains of any supplier tier at the earliest possible stage. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within the business, or any tier of the supply chains constitutes Modern Slavery, raise it with the Chief Compliance Officer. Employees can also talk to their Supervisor, Leader, or a member of the Legal Team who will support employees with reporting the matter.

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NOVA Chemicals has also established a reporting system called EthicsPoint[®] which employees and anyone else may use for the purpose of reporting known or suspected misconduct or raising ethics or compliance-related questions. EthicsPoint can be reached by phone at 1-800.985.7423 and is available 24 hours a day, seven days a week, and is operated by an external third party. Online reports can also be made anonymously or otherwise to [EthicsPoint](#).

Breaches of this Policy:

NOVA Employees and Contract Workers: Any employee or contract worker who breaches this Policy will face disciplinary action, which could result in termination of employment or engagement without notice or payment in lieu of notice.

Suppliers: We may withhold orders, request corrective actions, assess payment penalties, withhold funds, or terminate the relationship with other individuals and organizations working on NOVA Chemicals' behalf if they breach this Policy or any requirements under the Act or other applicable legislation aimed at eliminating Modern Slavery.

Prohibition on Retaliation:

It is a violation of this Policy to retaliate against anyone who in good faith makes a report or brings a complaint under this Policy or participates in or cooperates with an investigation under this Policy and/or otherwise opposes conduct or practices prohibited by this Policy. NOVA Chemicals will take action, up to and including termination of employment or engagement without notice or payment in lieu of notice, if it finds that retaliation has occurred.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that Modern Slavery is or may be taking place in any part of NOVA Chemicals' business or in any of its supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Chief Compliance Officer or Legal Department immediately.

Corrective Actions:

Where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to suppliers to help address coercive or exploitative work practices in their own business and supply chains.

Distribution of Policy:

The Human Resources Department will provide all new employees with a copy of this Policy as part of their orientation materials. The Procurement Department will provide any new buying agents with a copy of this Policy upon assignment into their group and on an annual basis thereafter as a refresher.

Compliance with Laws:

This Policy is intended to comply with all applicable laws; provided, however, in the event this Policy conflicts with applicable law in any way, the applicable law shall govern and supersede the conflicting portion of the Policy.

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Compliance:

This Policy will be evaluated on an annual basis to determine whether amendments are warranted. All material revisions to this Policy must be approved in accordance with the Delegation of Authority Policy. Any updates to this Policy must be complied with by NOVA Chemicals and its supply chains.

Additional Information and Interpretation:

Any questions regarding the application of this Policy should be referred to the Chief Compliance Officer or the Legal Department.

Related Policies:

[Business Conduct Policy \(Our Code of Conduct\)](#)

[Business Partner Due Diligence Policy](#)

[Supplier Code of Conduct](#)

[Sustainable Procurement Policy](#)

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