



SHAPING A BETTER WORLD



Supplier Code of Conduct



NOVA Chemicals and its subsidiaries maintain the highest ethical standards in its business activities and expect the same from its Suppliers. Acting ethically means complying with all applicable laws and regulations and conducting business in an ethical manner.

NOVA Chemicals is committed to operate as a responsible corporate company and to comply with all relevant local, national, and international laws. Our mission is to be a leader in our industry and to continuously improve our performance; but in so doing, we will not compromise our standards.

NOVA Chemicals expects its Suppliers to comply with applicable laws and adhere to internationally recognized environmental, social and governance (ESG) standards.

This Supplier Code of Conduct (“Code”) should guide the actions of all NOVA Chemicals Suppliers. It is understood that the term “Suppliers” covers any natural person or legal entity providing services or supplying other goods, as well as Suppliers that provide services to NOVA Chemicals that are directly related to obtaining, retaining or facilitating business, or for the conduct of matters relating to NOVA Chemicals, including, without limitation, any supply chain partners, consultants, resellers, contractors, and other professional service providers. We expect our Suppliers to make every effort to ensure that the principles set forth in this Code are followed. In particular, you must immediately inform us if you are notified by a regulatory authority or any other external party of an audit, investigation, lawsuit, or other inquiry regarding NOVA Chemicals, if not legally prohibited from doing so.

We strictly prohibit retaliation of any kind against anyone who reports a concern in good faith and require the same of you.

Human Rights

All people are entitled to human rights. NOVA Chemicals believes that all of its employees and Suppliers deserve a fair and ethical workplace and must be treated with dignity and respect. This means that you must treat all employees, contractors, and subcontractors fairly, with dignity, respect, and integrity. Do not discriminate, harass, intimidate, threaten, humiliate, or abuse employees or contractors generally and specifically as follows:

Suppliers shall not discriminate against any staff member based on race, color, religion, gender, age, national or social origin, sexual orientation, gender identity, marital status, disability, political affiliation, or union membership, in hiring and other employment practices like salary, promotions, rewards, access to training, employment termination, and retirement, and to be equally committed to providing equal opportunities and treatment to all employees.

Suppliers shall provide a workplace free of harassment, corporal punishment, coercion, and abuse. Any threats or other forms of intimidation must be prohibited.

Suppliers shall ensure that all work is voluntary. Employment contracts shall be easily understood by employees, and they should be free to terminate their employment upon reasonable notice. They shall not traffic persons or use any form of forced, bonded, slave, or prison labor. Employees should not surrender any personal identification documents as a condition of employment.

Suppliers shall employ only members of staff who are at least the applicable minimum legal age for the work to be performed. For persons under the age of 18, shall identify presence, monitor health, working conditions, hours of work, and shall not employ for hazardous work or in a manner that is economically exploitative, interferes with education, or is harmful to health, physical, mental, spiritual, moral, or social development. Legitimate workplace apprenticeship programs for educational benefit are acceptable, provided that they are consistent with applicable law.

Suppliers shall follow all applicable laws, regulations and/or collective agreements with respect to working conditions, hours, days of rest, wages, and salaries. Suppliers shall freely allow employees to associate with others and organizations of their choice and seek representation to bargain collectively.

Suppliers shall allow employees to express their concerns about working conditions or potentially unlawful practices without threats of reprisal or harassment.

Suppliers must always provide a healthy and safe working environment to all employees and contractors. As a minimum, this includes safe drinking water, adequate lighting, temperature, ventilation, and sanitation. All facilities and housing conditions, if provided, must be constructed and maintained in accordance with the standards set by applicable laws and regulations.



Integrity

We expect our Suppliers to conduct business in a fair and ethical manner and operate in full compliance with international, national, and local laws and regulations that are applicable to their business operations.

Anti-bribery & Corruption: We have zero tolerance for any form of bribery or corruption. Suppliers must comply with applicable anti-bribery and anti-corruption laws and behave ethically in all business dealings with, for or on behalf of NOVA Chemicals.

Improper Payments: Suppliers are prohibited from offering, promising, giving, requesting, or accepting improper payments (e.g., a bribe, a “kickback”, or anything of value, including gifts, meals, entertainment, etc.) directly or through others in an attempt to improperly gain or retain business or influence a decision. Suppliers should not make any form of payment to government employees to expedite the timing of activities that the government employee is required to perform (e.g., process visas, customs declarations, etc.) except if it is an official express service offered by them.

Gifts & Entertainment: Suppliers must respect that NOVA Chemicals employees do not give or accept any gift or favor that could compromise or raise doubts about the neutrality of their decisions. Suppliers must ensure that payments, gifts, or other commitments to customers, government officials, subcontractors, or other parties transacting on their behalf are in compliance with all foreign corruption and applicable anti-bribery laws.

Because gifts and entertainment may be used to disguise bribery and corruption, we require that you only offer or accept gifts or entertainment that are reasonable, directly related to a proper business purpose, and in accordance with local laws governing such activity. Cash or cash equivalents are not permissible. Any offer of a gift or entertainment to one of our employees during an open bidding process in which you are involved is strictly prohibited. If there any doubt with respect to what NOVA Chemicals employees may or may not offer or receive with respect to gifts and entertainment, do not hesitate to reach out directly for clarification.

Supply Chain: Suppliers must carefully scrutinize, select, and monitor the Suppliers you use to act for or on behalf of us. Both you and we are potentially responsible for the conduct of these Suppliers when they are working for or providing services to NOVA Chemicals. Failure to fulfill this responsibility may lead to fines, loss of necessary operating authorizations, restrictions on government contracts, and other legal penalties.

You must conduct appropriate diligence and background checks on these Suppliers. We require, as a minimum, that you gather, analyze, manage, and monitor information to ensure that any Suppliers that you use have a shared commitment to abiding by applicable laws. This would include checking the legitimacy and background of Suppliers before they commence a business relationship with you and monitoring them throughout the course of that relationship. Suppliers, contractors, agents, representatives, or subcontractors should only be selected based on merit and competitiveness. You are responsible for ensuring that your own Suppliers comply with this Code with respect to business conducted for or on behalf of NOVA Chemicals.

Competition: You are expected to comply with the competition laws in the countries where you operate, sell, or provide products and services. You must not coordinate market conduct with competitors or your own Suppliers in a way that improperly restricts competition.

You must not discuss internal or material non-public business information, such as prices, discounts, pricing policy, profits, market share, production levels, customers, or sales territories with a competitor, particularly concerning work performed.

Transparency

Conflicts of Interest: You must avoid any activity that creates a conflict of interest or the appearance of a conflict of interest that brings into question your relationship with NOVA Chemicals. This includes conflicts of interest that may result from financial interests, employment, time commitments, outside directorships, stock ownership, friends/family relationships, sponsorships or honorariums, and use of confidential information. You acknowledge that you will not use your position to profit personally at the expense of NOVA Chemicals.

Books & Records: Accurate and transparent books and records should be maintained at all times and demonstrate compliance with applicable laws and regulations. You must be watchful for, and report, any irregular payments, suspicious transactions, or suspected money laundering.

Audits & Assessments: You are expected to cooperate with internal and external investigators and auditors. You must notify us of any ethics and compliance concerns you have with respect to any dealing you have with NOVA Chemicals or our employees. In addition, we and our external representatives have the right to inspect and audit your books, records, and accounts relating to work done for or on behalf of NOVA Chemicals, as well as conduct operational audits, upon the provision of reasonable notice.

Reporting Surveys: You are expected to promptly, fulsomely and accurately respond to any supplier questionnaires/surveys or requests for information regarding product composition sent in connection with NOVA Chemicals' reporting obligations including, but not limited to, under the *Canadian Environmental Protection Act, 1999* and the *US Toxic Substances Control Act*.

Health, Safety and the Environment

As a Responsible Care® company, NOVA Chemicals encourages the responsible development, manufacture, transportation, storage, handling, distribution, use, and ultimate disposal of chemicals and plastic products in order to minimize adverse effects on human health and the environment. We are committed to preserving the environment, complying with all applicable health, safety, and environmental laws and regulations, demonstrating continual improvement in our health, safety, and environmental performance, and following industry practices to do so. We strive to ensure that the feedstocks, raw materials, and process chemicals we use, the products we manufacture, and the resultant waste do not represent an unacceptable level of risk to our own employees, the public or the environment.

Compliance with Law: You must comply with all applicable health, safety, and environmental laws and regulations, demonstrate continual improvement in your environmental performance, and following industry practices to do so.

Minimize Waste and Emissions: You are obliged to minimize wastage of energy, water, and other resources, prevent discharge that would have an adverse impact on the environment, and recycle whenever possible.

Safe Handling and Use of Materials: You are obliged to minimize the risk of injury to employees and people, wastage of energy, water, and other resources, prevent discharge that would have an adverse impact on the environment, and recycle whenever possible.

Distribute Hazard Information: You are obliged to provide your employees with applicable health, safety, and environmental information about the hazards associated with feedstocks, chemicals, and with NOVA Chemicals products and wastes in order to enable the safest possible handling, transport, and use of the materials involved.

Be Prepared: You are obliged to ensure that emergency response capability is in place, respond to requests for information in the event of an incident, and report to NOVA Chemicals any incidents associated with the transportation, handling, use, and disposal of NOVA Chemicals' products and wastes in a timely manner.

Confidentiality

Confidential information: You must safeguard NOVA Chemicals' confidential data and follow relevant data protection, privacy, and information security laws and regulations. In doing so, you agree only to acquire, or seek to acquire confidential information or personal data through proper means. That information must be kept secure and accessible only to those with a legitimate need to access it. You will not discuss, disclose, transfer, release, or share any confidential information or personal data concerning NOVA Chemicals without prior written consent from us.

Competitive Information: You will not seek to obtain or use insider material, or confidential information that belongs to competitors or other third parties. You will return any materials mistakenly, or otherwise, containing such competitive information to NOVA Chemicals [Ethics & Compliance](#).

Acknowledgement

By doing business with NOVA Chemicals, you are deemed to have read and understand this Code. Failure to adhere to these standards or failure to correct violations may reflect negatively on your relationship with NOVA Chemicals.

If you have a question or concern regarding the Supplier Code of Conduct, report it either directly to your NOVA Chemicals contact person or online (anonymously or otherwise) through NOVA Chemicals [EthicsPoint](#)®.

