



Shaping the World
with Integrity

Contents

A Message from Leadership 2

NOVA's Nature 3

We Uphold Our Code 4

Understand and follow our Code 5

Uphold our responsibilities as leaders 6

Raise concerns and get help 6

Make ethical decisions 7

We Foster Integrity In The Workplace 8

Value diversity 9

Treat each other with respect 10

Uphold human rights 11

Protect our privacy 12

Promote a safe and healthy workplace 13

We Foster Integrity Within The Company 14

Responsible prepare and distribute business communications 15

Avoid and disclose conflicts of interest... 16

Give and receive gifts and entertainment responsibly 17

Disclose and discuss improper payments 18

Safeguard company financial, physical and information assets 19

Understand the delegation of authority... 20

Protect confidential and proprietary information 21

Use social media responsibly 22

Engage in political activities responsibly 23

We Foster Integrity In The Marketplace 24

Follow competition laws 25

Prevent money laundering 26

Avoid insider trading 26

Maintain a responsible supply chain 27

Follow trade controls and immigration laws 28

We Foster Respect Within The Community 29

Protect the environment 30

Contribute to community well-being 31

Engage with Indigenous communities 31

We Ask for Help 32

Resources and contacts 33

A Message from Leadership

NOVA's Nature

We Uphold Our Code

We Foster Integrity In The Workplace

We Foster Integrity Within The Company

We Foster Integrity In The Marketplace

We Foster Respect Within The Community

We Ask for Help

A message from leadership

A Message from NOVA Chemicals' Executive Committee

At NOVA Chemicals, we believe we can help shape a world where the plastic products vital to our lives are even better tomorrow than they are today. To be a leader in our industry, we must do the right thing for our customers, our communities, our environment and one another. The principles and values contained in our Code of Conduct guide our strategy and our decisions. It details our principles and standards, and our ethical culture, so that we have clarity about our daily actions.

Ethical culture encourages dialogue at all levels. You should report any issues or problems that you observe and ask for help if you need it. Talk openly in your team and with your leaders about what you see happening and about how things could be better. We, along with other leaders, welcome and encourage your questions, input and ideas. They are the key to our future success.

Our company provides the tools to support our ethical culture. Use our Code of Conduct as a guide in making ethical decisions. Read it, understand how it applies to your job and refer to it—often. Consult [Ethics & Compliance](#) if you need more detailed advice. Use our [EthicsPoint](#) in situations where confidentiality is an issue. Be assured that NOVA Chemicals does not tolerate retaliation against anyone who speaks up about unethical conduct. We are all responsible for doing what is right.

Thank you for taking the time to review and understand the importance of our Code of Conduct.

Working together, we can shape a world that is better tomorrow than it is today.

Table of Contents

A Message from Leadership

NOVA's Nature

We Uphold Our Code

We Foster Integrity In The Workplace

We Foster Integrity Within The Company

We Foster Integrity In The Marketplace

We Foster Respect Within The Community

We Ask for Help

NOVA's Nature

NOVA's Nature supports the vision, shapes the culture and reflects our values. Core values help us in the decision-making processes. Core values educate clients and potential customers about what we are about and clarify our identity. Basically, they're the win-win, do-good principles that give us a greater purpose.



Responsible — We conduct ourselves with honesty and integrity, and take accountability for our actions.

Passionate — We are motivated and energized to help shape a world that's even better tomorrow than it is today.

Innovative — We fuel our success with everyday curiosity, imagination and creativity.

Collaborative — We productively reach across boundaries to partner with each other as well as our customers, suppliers and communities.



Table of Contents

A Message from Leadership

NOVA's Nature

We Uphold Our Code

We Foster Integrity In The Workplace

We Foster Integrity Within The Company

We Foster Integrity In The Marketplace

We Foster Respect Within The Community

We Ask for Help



We Uphold Our Code

Table of Contents

A Message from Leadership

NOVA's Nature

We Uphold Our Code

We Foster Integrity In The Workplace

We Foster Integrity Within The Company

We Foster Integrity In The Marketplace

We Foster Respect Within The Community

We Ask for Help

We uphold our Code

We uphold our Code. Ethics & Compliance leads, develops and supports all aspects of the NOVA Chemicals Ethics & Compliance Program.



Its responsibilities include, among other things:

- Empowering a culture of ethics and compliance
- Ensuring everyone, especially leadership, is committed to ethical conduct
- Creating and administering a comprehensive ethics and compliance program, designed to prevent unlawful or unethical business conduct and to detect it if it occurs
- Assessing ethics and compliance risks and testing to ensure that internal controls are responsive to those risks
- Investigating and remediating alleged violations of laws, regulations or policies and procedures and ensuring that improper conduct is held consistently and fairly to account

Understand and follow our Code

We are all responsible for ethics and compliance. By working for, or with, NOVA Chemicals, you agree to adhere to our Code and values. Those who fail to follow our Code put themselves, their colleagues and NOVA Chemicals at risk.

It is your responsibility to read, understand and adhere to this Code and any related policies and procedures. Violation of this Code may result in disciplinary action. This can include termination of your employment for cause and even criminal or civil sanctions.

We all:

- Follow applicable laws and regulations
- Uphold our commitment to always do what is right
- Demonstrate ethics, integrity and accountability at all times and expect the same from others
- Understand and comply with the requirements of this Code and other NOVA Chemicals' policies
- Complete assigned training relating to this Code

If you are ever unsure about an Ethics & Compliance issue, ask questions (see [Make ethical decisions](#)). Always get help when you need it (see [Raise concerns and get help](#)).

Uphold our responsibilities as leaders

Leaders model our values and lead with integrity. They ensure that our values are communicated clearly and applied consistently.

Good leaders need to:

- Lead by example and support all employee efforts to live our values and act according to the Code and the Ethical Leadership guide
- Keep an open-door policy and be willing to **hear** what people have to say
- Support people who speak up by **listening** closely and taking their concerns seriously
- Never retaliate against employees who make good-faith reports of misconduct
- Foster a culture in which employees feel protected from retaliation because they truly are

Raise concerns and get help

We encourage openness. Everyone at NOVA should raise ethics or compliance questions or concerns in good faith, without fear of retaliation—even if they turn out to be mistaken.

- You are able to raise a question or report a concern anonymously.
- Those who engage in retaliatory action against anyone who reports an issue will be subject to disciplinary action. Such action may include termination of employment for cause.
- Confidentiality is key to protecting you and the investigative process. Information will only be disclosed on a strict need-to-know basis.
- Intentionally false, exaggerated reports and reports made in bad faith will not be tolerated. Such reports may be subject to disciplinary action, which may include termination of employment for cause.

What to do

- Raise concerns in good faith. Do not raise concerns simply because you have personal or workplace differences.
- Do not worry about the consequences of reporting a concern. No one will suffer any penalty from reporting possible wrongdoing, even if we lose business or suffer in other ways as a result.
- Try to directly resolve any workplace interpersonal issues that you might have. If this is not possible, raise them with your leader or HR Business Partner before raising them formally.
- Cooperate with investigations when requested so that matters are quickly and properly resolved.
- Respect the confidentiality of investigations. Do not share information about an investigation, except as directed. Do not expect to learn the outcome of an investigation unless you will be implementing or assisting with follow-up actions.
- If you see it, say it!



Learn more

[Reporting Process](#)

Table of Contents

A Message from Leadership

NOVA's Nature

We Uphold Our Code

We Foster Integrity In The Workplace

We Foster Integrity Within The Company

We Foster Integrity In The Marketplace

We Foster Respect Within The Community

We Ask for Help

Making ethical decisions

At times, the most ethical course of action may not be clear. When you face such a situation, consult our Code and talk to a leader. You may also consider these questions.



Table of Contents

A Message from Leadership

NOVA's Nature

We Uphold Our Code

We Foster Integrity In The Workplace

We Foster Integrity Within The Company

We Foster Integrity In The Marketplace

We Foster Respect Within The Community

We Ask for Help

Table of Contents

A Message from Leadership

NOVA's Nature

We Uphold Our Code

We Foster Integrity In The Workplace

We Foster Integrity Within The Company

We Foster Integrity In The Marketplace

We Foster Respect Within The Community

We Ask for Help



We Foster Integrity In The Workplace

Value diversity

Through collaborative teamwork, we reach our potential as individuals. Treating each other with care and respect gives everyone an equal chance to thrive.



Respectful workplaces embrace all kinds of differences. These include gender, race, sexual orientation and expression, age, religious beliefs, culture, socioeconomic background, work experience and physical appearance. Some of these differences are protected by law, and some are not. But all of them create a rich work environment.

These characteristics do not prohibit NOVA Chemicals from making a good-faith, non-discriminatory business decision about an employee's employment. For example, NOVA Chemicals is free to hire, promote and discipline based on a wide range of business considerations. These can include skills, experience and performance.

Our responsibilities

- Comply with all applicable anti-discrimination laws, rules and regulations
- Make reasonable accommodations for the disabilities, religious beliefs and family status of others
- Make employment decisions on the basis of job performance and never on the basis of protected or discriminatory characteristics

Promoting a psychologically safe workplace

We strive to always promote a psychologically safe workplace. This enables everyone to bring their full self to work. In a psychologically safe workplace, everyone is safe to learn, safe to contribute and safe to challenge the status quo—all without fear of being marginalized or punished in some way.

Our responsibilities to promote a psychologically safe workplace are set out in greater detail in our [Respectful Workplace and Violence Prevention Policy](#).

Table of Contents

A Message from Leadership

NOVA's Nature

We Uphold Our Code

We Foster Integrity In The Workplace

We Foster Integrity Within The Company

We Foster Integrity In The Marketplace

We Foster Respect Within The Community

We Ask for Help

Treat each other with respect

We all have the right to work in a safe, respectful environment. To maintain respect in our workplaces, we must recognize and report harassment. Harassment is behavior that creates an intimidating, hostile or offensive work environment.



Our responsibilities

- Remain sensitive to how our actions and comments might be perceived or understood by others
- Remember that offensive behavior is the perception of an objective observer, not the intent of the sender
- Conduct ourselves appropriately in any dealing with others inside or outside of the workplace

Examples of harassment

Harassing behavior can include:

- Physical or psychological bullying that creates fear or mistrust, or that ridicules or devalues the individual (e.g., jokes, innuendos, fist-shaking, yelling)
- Creating, displaying or circulating offensive language, pictures or materials in print or electronic form (e.g., graffiti, cyberbullying)
- Name-calling, slurs, harassing phone calls, spreading rumors
- Deliberate misgendering by referring to a person using terms or pronouns that do not align with the person's affirmed gender
- Making inappropriate gestures/comments to intimidate someone
- Deliberately setting an individual up to fail (e.g., making unreasonable demands, setting impossible deadlines, interfering with work)
- Intentionally withholding information or giving the wrong information
- Taking away work or responsibility without cause



Uphold human rights

We stand by the principle that everyone has the right to be treated with dignity and respect. As proud participants in the United Nations Global Compact, we recognize and respect human rights. We expect our partners to do the same. In this way, we help create the world we all want.



We maintain safe working conditions in all places where we do business. All employees are given fair and appropriate working hours and compensation. The use of child and forced labor of any kind is illegal and inhumane.

Human trafficking, or modern slavery, is a criminal industry. It denies people their freedom and human rights. We are against human trafficking, slavery and all human rights violations. We are hired fairly and with consent, and we hire others fairly and with consent.

Our responsibilities

- Ensure that everyone working at or with NOVA Chemicals has proper working conditions, hours and compensation
- Respect human rights of those with whom we interact and require the same of our business partners
- Speak up if we see signs of human trafficking or slavery, or suspect any other human rights violation in our supply chain

If you see or suspect human rights violations, contact [EthicsPoint](#).

Table of Contents

A Message from Leadership

NOVA's Nature

We Uphold Our Code

We Foster Integrity In The Workplace

We Foster Integrity Within The Company

We Foster Integrity In The Marketplace

We Foster Respect Within The Community

We Ask for Help



Protect our privacy

We respect the confidentiality of employees' and third parties' personal information. We limit access to personal records to those who have a need to know for business purposes.

What is personal information?

Personal information can be used to identify an individual. Some examples include:

- Payroll information
 - Social insurance number/social security number and banking information
- Wage and benefit information
 - Forms relating to applications for employee benefits
- Emergency contact information
 - Spouse, significant other or family member's phone number

Many countries have laws and regulations that restrict the spread, storage and use of personal information outside of their borders. Wherever we do business, we treat employee personal information with the utmost care.

NOVA Chemicals may use and share your personal information to assist us in our employment relationship with you. We may need to share such information when hiring or when employment is ending. Your personal information may also be disclosed or transferred in the event of a change in ownership, a merger/ acquisition or a joint venture. In these cases, we will ensure that such party is bound by appropriate obligations to safeguard your personal information according to our [Privacy Policy](#).

Our responsibilities

- Protect the confidentiality of the personal data that we have access to and ensure it is used only for legitimate business purposes
- Collect, use, store or release personal information only when there is a legitimate business need and the collection, use, storage or release has been properly authorized
- Understand the applicable laws and regulations that apply to personal data under our control
- Immediately report any unauthorized access or unauthorized disclosure of personal data to the [Privacy Officer](#), your leader, HR Business Partner, Legal, [Ethics & Compliance](#) or [EthicsPoint](#)

Table of Contents

A Message from Leadership

NOVA's Nature

We Uphold Our Code

We Foster Integrity In The Workplace

We Foster Integrity Within The Company

We Foster Integrity In The Marketplace

We Foster Respect Within The Community

We Ask for Help



Promote a safe and healthy workplace

We are all responsible for the well-being of our coworkers and communities. We take all reasonable and legally required precautions to keep our workplaces safe. We also reject all forms of verbal intimidation and physical violence in the workplace.



Our health and safety requirements are absolute. We are all expected to identify risks and to put forth a plan that mitigates them. This is the best way to protect ourselves, our coworkers and our business partners.

Our responsibilities

- Comply with all applicable health and safety policies and procedures at our work locations
- Realize no activity is so important that it cannot be done safely
- Know how to react in an emergency
- Immediately report any accident, injury, illness, incident or unsafe condition when we become aware of it, and correct the unsafe conditions when possible
- Never undertake work when impaired by alcohol or drugs, whether legal or illegal
- Never possess, use or transfer legal or illegal drugs or controlled substances on NOVA Chemicals property or while engaging in company business
- Never verbally or physically intimidate, threaten or assault others

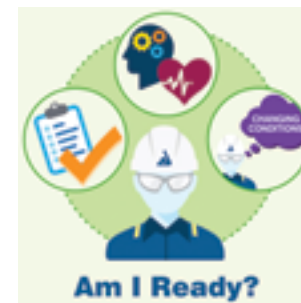


Table of Contents

A Message from Leadership

NOVA's Nature

We Uphold Our Code

We Foster Integrity In The Workplace

We Foster Integrity Within The Company

We Foster Integrity In The Marketplace

We Foster Respect Within The Community

We Ask for Help



We Foster Integrity Within The Company

Responsibly prepare and distribute business communications

We strive to shape our work environment to foster mutual respect, openness and integrity. Our personal and business communications must mirror these values. We are judged not only by what we do but also by what we say.



In today's world, our communications may, at some point, become public. In the pressure of everyday business, we may forget that even messages intended to be private may be disclosed. Such messages can have a dramatic effect on our reputation.

The many forms of business communications

- Verbal communications
 - Work-related voice messages, phone calls and face-to-face conversations
- Electronic communications
 - Work-related email messages; text messages, instant messages and chats; and social media posts
- Print communications
 - Work-related documents, reports, spreadsheets and notes, as digital files or hard copies
- Mixed media
 - Work-related presentations that use audio and video

Our responsibilities

- Use care in all communications, including memos, letters, emails, phone calls and face-to-face conversations
- State information that is only factual and relevant to the subject we are discussing
- Avoid generalizing or exaggerating in our communications



Avoid and disclose conflicts of interest

A conflict of interest compromises your workplace objectivity or loyalty to NOVA Chemicals. Even the appearance of a conflict of interest can harm our reputation.



Conflicts of interest arise from:

- Financial, business or social activities outside NOVA Chemicals
- Business or financial ties to third-party stakeholders
- Personal relationships, including those with family and close friends

We never use NOVA Chemicals as a means to advance personal interests, or to benefit friends or family. This would be a conflict of interest.

The best way to handle a possible conflict of interest is to disclose it. We require you to declare and seek approval for any potential or actual conflict of interest. You may also certify that you have no such conflict.

Our responsibilities

- Be familiar with and understand the disclosure requirements of the [Conflicts of Interest Policy](#); do not hesitate to ask questions if you require further clarity
- Avoid any activity that creates a conflict, or even the appearance of a conflict, between your personal interests and the interests of NOVA Chemicals
- Disclose any actual, perceived or potential conflict of interest that you might have in order to protect yourself and the organization
- Follow any restrictions imposed on you as a result of a conflict-of-interest disclosure



Table of Contents

A Message from Leadership

NOVA's Nature

We Uphold Our Code

We Foster Integrity In The Workplace

We Foster Integrity Within The Company

We Foster Integrity In The Marketplace

We Foster Respect Within The Community

We Ask for Help

Give and receive gifts and entertainment responsibly

Global anti-corruption laws define a “bribe” broadly. Conduct that may be acceptable under many circumstances is unacceptable when combined with an attempt to improperly influence a business-related decision. In such cases, the conduct is a bribe.

Items of value that could be considered a bribe include:

- Cash
- Gift cards, vouchers and other gifts
- Travel
- Entertainment and hospitality
- Certain charitable or political contributions

We prohibit all acts of corruption. These include bribes, kickbacks and giving or accepting unfair advantages. We never make or accept a facilitating payment or any other form of improper payment.

Public officials

We must take extra care when doing business with public officials. Penalties can be severe for seeking an unfair business advantage with such officials. Never give to or receive from a public official anything of value without first seeking pre-approval from [Ethics & Compliance](#).

Our responsibilities

- Never offer, give or accept payment or anything of value (such as a gift), directly or through a third party, in the attempt to gain business or to improperly influence a business decision
- Be familiar with and understand the reporting requirements of the [Anti-Bribery & Corruption Policy](#)
- Contact [Ethics & Compliance](#) if you are, or believe you may be, confronted with a bribe or potential facilitating payment



Disclose and discuss improper payments

Improper payments are not the same as reasonable business courtesies, which are permitted. But an improper payment can sometimes be difficult to distinguish from a legitimate expense.



We never accept or offer a payment to anyone to gain a business advantage. This is especially important when dealing with public officials and government entities. All payments to public officials are prohibited. This includes any payments to speed up routine processes, or “facilitation payments.”

We never ignore facts that may give rise to a suspicion of an improper payment. Any indications that a payment or a proposed payment may be improper must be promptly reported.

Safeguard company financial, physical and information assets

We are good stewards of the resources entrusted to us. These include our financial, physical and information assets. We take proper care of all our assets and records.



Our information and communication systems and the electronic data they store are vital business assets. By being responsible for their security, we ensure the effectiveness of our operations. By staying focused on their proper use, we help avoid legal liabilities, financial losses and harm to our reputation. The use of all communications systems is governed by the Code. Misuse is subject to disciplinary action, including termination of employment for cause.

We always spend company funds carefully. Incurring travel and other business expenses should be consistent with the needs of the business. NOVA Chemicals employees should neither gain nor lose financially as a result of business travel or expenses.

Like other aspects of our work, our recordkeeping is clear, open and honest. Our records are complete and accurate. This allows us to make responsible business decisions and provide truthful information in compliance with legal disclosures.

Our stakeholders expect us to maintain accurate books and records. They also expect us to truthfully communicate within and outside NOVA Chemicals as required by law. We honor their trust, day in and day out.

Our responsibilities

- Never use NOVA Chemicals assets for personal reasons
- Use credit and travel cards provided by the company for business purposes only
- Never dispose of any records that are expected to become the subject of litigation, legal hold, investigations or audits without the approval of Legal

What are assets?

- Physical assets
 - Land, facilities, vehicles, equipment and inventory
- Financial assets
 - Cash, receivables and investments, business records and accounts
- Proprietary information
 - Trade secrets, patents, copyrights and confidential business information
- Contract rights and licenses
 - Agreements about fair use of proprietary information
- Digital data
 - Messages stored in or sent through our information communications systems

Understand the delegation of authority

To ensure effective governance, NOVA Chemicals has established a [Delegation of Authority Policy](#) and Matrices. This policy and matrices give authority to specific business units and roles within the company to perform certain tasks. These tasks are defined in the matrices within the [Signature Authority Tables](#).



The creation of controls minimizes the risk of mistakes or improper conduct by separating the authority to sign agreements from the authority to approve expenditures.

Our responsibilities

- Follow the procedure for obtaining approval for contracts detailed in the policy
- Sign contracts or approve expenditures only if we have been given authority in accordance with the Signature Authority Tables
- Be aware that contracts and agreements may have liabilities associated with them that can change the level of signature authority



Protect confidential and proprietary information

Our intellectual property helps us develop new products and services. Our ideas and know-how attract new customers and help us maintain our competitive advantage. Much of this information is confidential. If disclosed, it could be very valuable to our competitors. It could also be highly damaging to both our customers and our company. Disclosure of such information could lead to lawsuits, fines and other penalties.



We never misuse confidential and proprietary information. This applies both when we are employees of NOVA Chemicals and when our employment ends.

Our responsibilities

- Take appropriate steps to protect confidentiality and confidential information belonging to us and to others
- Take steps when developing products to ensure the ideas and innovations we develop are truly our own
- Never disclose confidential information to any third party, including family members, unless we have authorization and the third party has signed an appropriate Confidentiality or Non-Disclosure Agreement

NOVA Chemicals' confidential information includes but is not limited to:

- Financial data
- Marketing or sales forecasts and strategies
- Customer information
- Price lists or formulas
- Supplier data
- Technology and research/development information
- Employee records

Use social media responsibly

When using social media, we adhere to our values. We always think before we post. Social media can help us generate interest in NOVA's recruitment, products and services as well as create business opportunities. But social media also creates reputational risk.



We follow NOVA Chemicals' rules and guidelines for responsibly using social media.

Our responsibilities

- Make sure our posts are in keeping with NOVA Chemicals' [Social Media Policy](#)
- Carefully distinguish our personal views from the company's position
- Never post offensive, derogatory or other inappropriate verbal or visual material

Social media refers not only to social networking sites but also to:

- Video- and photo-sharing websites
- Micro-blogging sites
- Forums and discussion boards
- Collaborative publishing

Table of Contents

A Message from Leadership

NOVA's Nature

We Uphold Our Code

We Foster Integrity In The Workplace

We Foster Integrity Within The Company

We Foster Integrity In The Marketplace

We Foster Respect Within The Community

We Ask for Help



Engage in political activities responsibly

From time to time, subjects of legitimate interest to NOVA Chemicals arise on the political scene. When this happens, it is important that the company speaks with one voice. We always speak through authorized channels when engaging in politics.



Lobbying public office holders is a legitimate activity. It is also regulated by federal, provincial and state laws and regulations. We never violate lobbying laws, no matter the jurisdiction. Doing so could jeopardize our lobbying abilities.

On a personal level, we all have the right to engage in political activities. But when we do, we must make sure our personal views and donations are clearly distinguished from those of the company. If we are ever in doubt about our political activities, we must seek prior approval from NOVA Chemicals' Government Affairs & Industry Relations department.

Our responsibilities

- Comply with all laws regulating the company's participation in politics
- Make it clear when we engage in political activity that we are speaking on our own behalf and not the company's
- Never make political donations on the company's behalf

Table of Contents

A Message from Leadership

NOVA's Nature

We Uphold Our Code

We Foster Integrity In The Workplace

We Foster Integrity Within The Company

We Foster Integrity In The Marketplace

We Foster Respect Within The Community

We Ask for Help

Table of Contents

A Message from Leadership

NOVA's Nature

We Uphold Our Code

We Foster Integrity In The Workplace

We Foster Integrity Within The Company

We Foster Integrity In The Marketplace

We Foster Respect Within The Community

We Ask for Help



We Foster Integrity In The Marketplace

Follow competition laws

We are committed to being a recognized leader in our markets, but never at the expense of our values. We owe it to our communities, our competitors and ourselves to compete with fairness and honesty. We can only win by following the highest ethical standards.



Antitrust, competition and related laws are designed to preserve and foster fair competition. We will always remain within these and other legal boundaries.

Many countries have laws concerning antitrust and unfair competition. These laws are strict and complex. They often reach across borders and carry severe penalties for companies and individuals who do not comply.

Our responsibilities

- Treat business partners fairly and in accordance with the law
- Never have discussions or reach agreements with competitors, customers or suppliers about fixing prices, dividing markets, rigging bids, hiring employees, wage-fixing or other actions that limit competition

Competing Fairly

We always attend events involving competitors, such as trade association meetings, with integrity. Careless discussions at such events can cause serious problems. Inappropriate statements in marketing materials can as well.

The joining of companies, for any reason, can affect competition. Many jurisdictions have laws that require prior clearance before businesses may join. These laws affect mergers, acquisitions, joint ventures or other similar transactions, especially if competitors are involved.

Table of Contents

A Message from Leadership

NOVA's Nature

We Uphold Our Code

We Foster Integrity In The Workplace

We Foster Integrity Within The Company

We Foster Integrity In The Marketplace

We Foster Respect Within The Community

We Ask for Help



Prevent money laundering

Most countries where we do business have laws designed to deter criminal enterprise, combat terrorist activity and protect national security. We comply fully with these laws.



Each of us must understand the source of monies and property we receive or procure. And we must know the identity of the person to whom we make payments.

Our responsibilities

- Exercise good judgment when dealing with customers or business partners
- Conduct due diligence in accordance with our [Business Partner Due Diligence Policy](#) to ensure that activities and transactions with our business partners are reputable and responsible
- Report any suspicious transactions or incidents of money laundering to the [Chief Compliance Officer](#)

Avoid insider trading

While NOVA Chemicals' common stock is no longer publicly traded, some of NOVA Chemicals' debt securities still are. If you have material, nonpublic information about NOVA Chemicals or any other company, you are prohibited from trading in its securities. Trading in a company's securities while you possess such information is insider trading. It is a serious violation of the law that can lead to major fines or even imprisonment.

Maintain a responsible supply chain

We seek to work with suppliers who share our values. By managing our value chain with integrity, we ensure both optimal and ethical business. We can influence our entire value chain to promote best practices across the globe.



We use globally recognized third-party providers of risk and sustainability ratings to conduct supplier assessments. These ratings help us identify and manage risk and promote continuous improvement in the supply chain.

Our responsibilities

- Follow all due diligence policies and procedures when seeking business partnerships
- Review current business partners according to protocol and assess risk
- Document and retain due diligence processes according to protocols

Table of Contents

A Message from Leadership

NOVA's Nature

We Uphold Our Code

We Foster Integrity In The Workplace

We Foster Integrity Within The Company

We Foster Integrity In The Marketplace

We Foster Respect Within The Community

We Ask for Help

Follow trade controls and immigration laws

We take all appropriate actions to comply with the laws and regulations governing international trade. These laws cover the transmission of goods, services and technical information across international borders.



Trade controls

Countries where we operate impose trade restrictions for many reasons. Trade controls can range from complete embargoes to bans on dealing with suspected terrorist entities. In some cases, these laws require certification that we comply with trade controls regarding the transfer of certain goods, information and technologies. Some of these laws also impose reporting, licensing and other requirements when certain types of products, such as hazardous chemicals, are imported or exported.

Our responsibilities

- Comply with our [Trade Restriction Policy](#) before making decisions to export goods, services, software or technology
- Know our customers and suppliers—who they are, what they do, where they are based and how they will use our goods or technology

Since world events change the landscape of trade compliance, we should consult with [Ethics & Compliance](#) on questions involving import and export matters.

Immigration laws

Immigration laws apply whenever we perform work for NOVA Chemicals in a country other than our home country. They also apply when we hire others to perform work in a country other than their home country. These laws require that all necessary visas and work permits are in place before cross-border travel. Before crossing any border for work, we should contact the [Chief Compliance Officer](#) to ensure all immigration requirements are met.

Table of Contents

A Message from Leadership

NOVA's Nature

We Uphold Our Code

We Foster Integrity In The Workplace

We Foster Integrity Within The Company

We Foster Integrity In The Marketplace

We Foster Respect Within The Community

We Ask for Help



Table of Contents

A Message from Leadership

NOVA's Nature

We Uphold Our Code

We Foster Integrity In The Workplace

We Foster Integrity Within The Company

We Foster Integrity In The Marketplace

We Foster Respect Within The Community

We Ask for Help

A close-up photograph of a person's hand reaching down to pick up a discarded plastic water bottle from the ground. The person is wearing a watch. In the background, other people are blurred, suggesting a group activity like a community cleanup. The scene is outdoors with natural light.

We Foster Respect Within The Community

Protect the environment

NOVA Chemicals is committed to being a leader in achieving a superior Responsible Care performance. [Responsible Care](#) is part of the foundation of our business model and one of the cornerstones of our culture.



We are responsible to our employees, our business partners and the public. Our standards ensure that we meet or exceed applicable laws and industry codes of practice. They also promote improved economic, social and environmental practices.

Our responsibilities

- Practice and encourage safe work habits and environmental responsibility
- Comply with all applicable environmental laws and company policies
- Immediately report environmental incidents

Responsible Care

[Responsible Care](#) is a voluntary initiative that demands we safely handle our products throughout their life cycle. This begins with inception and continues through manufacturing and distribution. It also includes our products' reuse, recycling or disposal. Responsible Care helps us achieve higher standards of performance and create greater value.

Table of Contents

A Message from Leadership

NOVA's Nature

We Uphold Our Code

We Foster Integrity In The Workplace

We Foster Integrity Within The Company

We Foster Integrity In The Marketplace

We Foster Respect Within The Community

We Ask for Help



Contribute to community well-being

As a Responsible Care company, NOVA Chemicals is accountable and responsive to the public. This is especially true for our local communities.



The communities where we work are important stakeholders. We support community service, and we take care of the environment.

We invest in the well-being of our communities and lend a hand to organizations that improve overall quality of life. The United Way is NOVA Chemicals' charity of choice—the main way we contribute in North America.

Our responsibilities

- Act honestly and ethically with coworkers, suppliers, customers, government representatives, community members, competitors and security holders
- Carry out our company-sponsored community service efforts with the same safety principles we use in our daily work
- Obtain prior approval from [Corporate Communications](#) and [Ethics & Compliance](#) before donating company funds or making contributions in the company's name

Engage with Indigenous communities

We engage with Indigenous communities with respect for their unique history, culture and rights. This includes identifying and seeking opportunities to engage and learn. We strive to develop and maintain working relationships and effective dialogue and consultation. We also provide equitable access to employment, including through procurement and the supply chain.



Table of Contents

A Message from Leadership

NOVA's Nature

We Uphold Our Code

We Foster Integrity In The Workplace

We Foster Integrity Within The Company

We Foster Integrity In The Marketplace

We Foster Respect Within The Community

We Ask for Help

Table of Contents

A Message from Leadership

NOVA's Nature

We Uphold Our Code

We Foster Integrity In The Workplace

We Foster Integrity Within The Company

We Foster Integrity In The Marketplace

We Foster Respect Within The Community

We Ask for Help



We Ask for Help

We ask for help

Resources and contacts

Questions or concerns? Contact Ethics & Compliance.

Email: complitrain@novachem.com

Online: [EthicsPoint](#)

- Anonymously, or otherwise

Phone: [EthicsPoint](#)

- 1.800.985.7423

Mail:

Chief Compliance Officer,
2100, 250 5th Street SW
Calgary, AB T2P 0R4

Chief Compliance Officer,
NOVA Chemical Inc.
1555 Coraopolis Heights Road
Moon Township, PA 15108 USA

Learn more about the policies referenced in the Code by visiting the [Policies](#) page on ChemCentral.

NOVA Chemicals is a registered trademark of NOVA Brands Ltd.; authorized use/utilisation autorisée. Responsible Care® is a registered trademark of the Chemistry Industry Association of Canada (CIAC).





August 2023
NOVA Chemicals Corporation
P.O. Box 2518
Calgary, Alberta, Canada T2P 5C6
Phone: 403.750.3600

© 2023 NOVA Chemicals Corporation. All Rights Reserved.