NOVA Chemicals
Our Journey, Our Values, Our Responsibility

Business Conduct Policy
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A message from the NOVA Chemicals

At NOVA Chemicals, our reputation is strongly centered around our commitment to operating responsibly. Responsibility is paramount in everything we do, and our values have taken shape around our commitment to the well-being of our coworkers, our community and the environment.

Responsibility also means that we operate legally and ethically at all times. NOVA Chemicals’ Business Conduct Policy—our Code of Conduct—sets forth the standards by which we conduct our operations. While the Code covers a number of topics, it can be summarized in one simple sentence: Do what is right. As employees, our role is to ensure that we uphold company policies by performing our daily tasks in a straightforward and ethical manner. Our hard work, dedication and integrity are essential to both maintaining our reputation and the future growth of our organization.

The Code of Conduct is a resource designed to assist you in making decisions with integrity and honesty. Although the Code is a valuable tool, it does not cover every situation you may encounter during your career. When in doubt, speak with your leader, HR Business Partner or a member of the Law department. You may also call our anonymous Ethics Line at 1-800-985-7423. There will never be retaliation against any employee who, in good faith, reports unethical conduct.

As NOVA Chemicals employees, we make a commitment to living our values—day in and day out. Thank you for making it your personal responsibility to ensure that we operate at the highest standards and lead with straightforward integrity.
Our values

At NOVA Chemicals, we are committed to living our values — day in and day out — on our Journey to #1.

Our values are the foundation of the way we do business, and we all have a responsibility to know them and live by them. Our Code of Conduct helps us make decisions that are in line with our values. Keep the Code handy, and use it often to find guidance, examples and resources to make the right decisions — today and every day.

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

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

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

**Collaborate** — We proactively reach across boundaries to partner with each other as well as our customers, suppliers and communities.
We uphold the business conduct policy — our Code of Conduct — when we:
Understand and follow our Code

This Business Conduct Policy, which is our Code of Conduct (“Code”), applies to everyone who works directly for or represents NOVA Chemicals, including all employees and directors of NOVA Chemicals and its subsidiaries.

Our Code sets the foundation for our ethical ways of working. We must read it, know it and follow it. Our Code is designed to protect NOVA Chemicals as a company as well as each of us as individuals from business, financial, legal, reputational and physical risks. Not knowing and understanding these risks — and the controls in place to manage them — leaves NOVA Chemicals, our reputation and our sustainability vulnerable.

Do not turn a blind eye to ethics and compliance risks — they will not go away. Whether the risk is in the country in which we do business, is with the business partner with whom we are dealing, or is inherent in the work activity itself, equip yourself with as much information and knowledge as possible to reduce that risk. Ensure that you ask the right questions, (see A Model for Ethical Decision Making), and get help when you need it (see Raise Concerns and Get Help).

Third parties such as contractors, consultants or partners who work with or represent NOVA Chemicals must share our ethics as embodied in our Code. This includes, where possible, a contractual requirement to act consistently with the Code when working for or on our behalf by providing goods or services.

Our Code does not spell out every action we must take in every situation. Rather, it serves as a reliable guide for making sound decisions, acting responsibly and living our values.
Act ethically and comply with laws

At NOVA Chemicals, we are dedicated to maintaining the highest ethical standards. We are all expected to comply with the laws and regulations of the countries in which we do business. Violations of the law or the Code can damage our reputation, subjecting employees and the company to civil and even criminal liability. Employees who knowingly commit such violations and leaders who knowingly permit or condone violations by others will both face serious discipline, up to and including termination of employment.

Uphold our responsibilities as employees

All employees are ambassadors of the company and are expected to deal fairly with fellow employees and third parties. We must always follow our policies and intent of the Code. To act as good ambassadors, each of us needs to:

- know the Code;
- understand and follow the rules that apply to us;
- speak our minds when something is amiss; and
- immediately report actual or possible violations of the Code.
Uphold our responsibilities as leaders

Leaders are responsible for modeling our values and standards and making sure they are communicated clearly and consistently to employees. Good leaders need to:

- provide fair and honest leadership;
- lead by example, supporting all employee efforts to live our values and act according to the Code;
- keep an open-door policy and indicate a willingness to hear what people have to say;
- support people who speak up by listening closely and taking their questions and concerns seriously;
- never retaliate against employees who make good-faith reports of misconduct; and
- foster a culture in which employees are protected from retaliation.

Commit to the Code

Our Code clearly states our aspiration to remain an ethical and compliant company. However, words are not enough. Integrity requires the personal commitment of each of us to make it a reality.

By working for or with NOVA Chemicals, you are agreeing to uphold this commitment. Each of us is required to periodically acknowledge that we have read, understand and will comply with the requirements of our Code. Those who fail to follow our Code put themselves, their colleagues and NOVA Chemicals at risk.

This periodic acknowledgement will be made electronically. New employees will be provided a copy of the Code and will complete their acknowledgment during their orientation.
Raise concerns and get help

At NOVA Chemicals, we speak up whenever we see the Code’s principles, guidelines or our ethical standards not being followed. If we are aware of an actual or possible violation, or just suspect one may have taken place, we report it. We maintain a strong ethical culture by asking questions and raising concerns whenever we see an issue or problem in the workplace. Only by raising a question or reporting a concern can we promptly and effectively address a potentially detrimental situation.

If you are comfortable doing so, start by speaking with your leader. You can also contact Ethics & Compliance or the Chief Compliance Officer directly. They are available to address your compliance questions and concerns.

If you are uncomfortable using the resources outlined above, a confidential NOVA Chemicals Ethics Line and web-based Workplace Alert Program are available for raising anonymous concerns of actual or suspected legal or ethical violations. You may also use these channels to ask questions about legal or ethical issues anonymously. These services are available 24 hours a day, 7 days a week, 365 days a year.

Phone:
1.800.985.7423
For toll-free country specific numbers, please visit the Ethics & Compliance website.

Internet:
Workplace Alert Program

Mail:
Chief Compliance Officer
NOVA Chemicals Corporation
Head Office
1000 Seventh Avenue, S.W.
Calgary, Alberta, Canada T2P 5C6

Chief Compliance Officer
NOVA Chemicals Inc.
U.S. Commercial Center
1555 Coraopolis Heights Road
Moon Township, Pennsylvania 15108 USA

Every concern matters

NOVA Chemicals takes all questions and concerns of suspected or observed misconduct seriously. All matters are treated confidentially to the extent possible.
Cooperate with investigations of reports

When a question or concern is raised, the matter is evaluated by Ethics & Compliance as to materiality and investigated by the relevant subject matter expert. The subject matter expert and the Chief Compliance Officer, if different, examine the results of the investigation, gather additional information and investigate further, as required.

Once an investigation has been closed, the Chief Compliance Officer makes his or her findings and recommendations, and the individual who raised the concern and any individual who is implicated are notified.

We are all required to cooperate fully with internal investigations. If the Chief Compliance Officer or an investigator asks you to answer questions or provide a statement, you must assist and tell the whole truth. Any effort to hinder an investigation by withholding information or providing misleading information can lead to disciplinary action, including termination of employment.
Avoid retaliation and understand our rights to report confidentially

We encourage you to raise any ethics or compliance question or concern. Be assured that NOVA Chemicals will not tolerate retaliation of any kind directed against anyone who reports, in good faith, an issue concerning the Code. This includes cases where the employee honestly suspects a possible violation but none is actually found. Individuals engaging in retaliatory conduct will be subject to disciplinary action, which may include termination of employment.

Retaliation involves being punished for making good-faith complaints about discrimination or harassment or for participating in workplace investigations. Punishment doesn’t just mean firing or demotion. It can include other negative employment actions such as being denied a raise or denied a transfer to a more desirable position. Retaliation is strictly prohibited.

Identifying yourself when making a report allows for a more thorough investigation and follow-up; however, if you wish to make a report anonymously, you may contact the Ethics Line or Workplace Alert Program. In any report, details are given to NOVA Chemicals Ethics & Compliance and, on a need-to-know basis, are shared with others within NOVA Chemicals who are necessary for the investigation and resolution of a situation.

To learn more, see our Reporting Process.
A model for ethical decision making

When you face a situation that raises an ethical or legal question and you are unsure about how to proceed, consider these questions:

- Does my action **comply** with the law and our policies?
- Is it **consistent** with our values and principles?
- Am I **comfortable** with other people, customers, partners and communities finding out about my action?

If you answered yes to all of these questions, proceed with confidence. Working through these questions can help you decide which path to take. If the path forward is not clear, do not hesitate to **seek help** from the many resources NOVA Chemicals offers.
We uphold our responsibilities to each other when we:
Inclusiveness

In the context of employment, discrimination means treating someone differently from others on the basis of legally protected characteristics. These characteristics include:

- race,
- color,
- ethnic origin,
- age,
- religion,
- creed,
- gender,
- marital status,
- family status,
- veteran’s status,
- sexual orientation, and
- disability.

This does not mean that these characteristics provide immunity to NOVA Chemicals’ business decisions. For example, NOVA Chemicals is free to hire, promote and discipline based on a wide range of business considerations such as skills, experience and performance.

Value diversity

Through collaborative teamwork and a commitment to being responsible for ourselves and our coworkers, we maximize our potential as individuals. Treating each other with care and respect gives everyone an equal chance to thrive.

Our workforce possesses a wide variety of skills, experiences and perspectives. This diversity is our strength. We honor and value our diversity while also promoting fairness. NOVA Chemicals is committed to providing a work environment that enables all employees to pursue their careers free from discrimination. We treat each and every employee in a fair and equitable manner, with honesty and respect. Our commitment to the principles of equal employment opportunity, inclusion and respect is vital to our success.

All employees must strictly adhere to all applicable anti-discrimination laws and regulations. Neither NOVA Chemicals nor any person acting on our behalf shall refuse to employ, advance or continue to employ any person based on a person’s protected characteristics.

Our responsibilities

- Comply with all applicable anti-discrimination laws, rules and regulations
- Make reasonable accommodations for the disabilities and religious beliefs of others and to prevent discrimination on other prohibited grounds
- Make employment decisions on the basis of job performance and never on the basis of protected characteristics
- Promptly report unfair treatment or discrimination to your leader, HR Business Partner or Ethics & Compliance
- Never retaliate against anyone who, in good faith, reports discrimination or honestly participates in an investigation of such reports
Treat each other with respect

We all have the right to work in an environment that is free of harassment, and we are all responsible for recognizing and reporting behavior that creates an intimidating, hostile or offensive work environment.

Harassment can include unwanted verbal or physical conduct related to a person’s race, color, ethnic origin, age, religion, creed, gender, marital status, family status, veteran’s status, sexual orientation, disability or any other legally protected status.

Speak up if you experience or witness harassment. Report it to your leader, HR Business Partner, Ethics & Compliance or via the many resources NOVA Chemicals offers. No employee will suffer retaliation or adverse employment consequences as a result of a report made honestly and in good faith.

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 the recipient, not the intent of the sender
- Conduct ourselves appropriately in any dealing with others in or outside of the workplace
- Promptly report any intimidating, abusive or harassing behavior we experience personally or witness happening to others

To learn more, see our Anti-Harassment Policy.

Examples of harassment:

- Behavior that creates an intimidating, hostile, abusive or offensive working environment
- Behavior that unreasonably interferes with or adversely affects an individual’s work performance
- Behavior that threatens others verbally or physically

The Code in action

Q: My leader is relatively young, and so are most of my colleagues. I’m 55 years old and feel like the lone older worker. Following my leader’s example, all of my coworkers are quite dismissive of me, and I am subjected to jokes and insults. Recently, my leader humiliated me in front of the group with a sarcastic comment about my attire being “from the ’80s.” Do I have any recourse?

A: It sounds like you are the subject of intimidation and a hostile work environment due to your age. Speak to your HR Business Partner or Ethics & Compliance about your situation.

Q: During an internal meeting, our leader made loud, racist comments about one of our suppliers. We’re all afraid to say anything because our leader isn’t known for being too forgiving about complaints. Should we just keep our mouths shut?

A: No! NOVA Chemicals does not tolerate racism in any form. If you are not comfortable discussing the problem with your leader, speak to your HR Business Partner or Ethics & Compliance. You may also speak with the Chief Compliance Officer confidentially. The Chief Compliance Officer will take it from there.
Protect our privacy

NOVA Chemicals is committed to safeguarding the privacy and confidentiality of the personal information of its employees and to complying with the privacy legislation in each jurisdiction in which we operate.

We respect the confidentiality of employees’ personal information. We limit access to personal records to those with appropriate authorization who have a need to know the information for legitimate business purposes. Personal information or data can be defined very broadly and varies from country to country. It can range from personal identification and phone numbers to information related to age, gender or health. Examples of personal information collected by NOVA Chemicals include:

- payroll information, including social insurance number/social security number and banking information;
- wage and benefit information, including forms relating to applications for employee benefits, such as short- or long-term disability, medical and dental care;
- pension and savings plan information; and
- emergency contact information.

Many countries have laws and regulations that restrict the dissemination and use of personal information outside of their borders. Regardless of what country we operate in, we treat employee personal information with the utmost care. We ensure reasonable protection when transferring data, in accordance with applicable privacy legislation and only in as far as a reasonable level of data protection is assured in the recipient country.

NOVA Chemicals may share your personal information to assist us with establishing, managing or terminating our employment relationship with you, including: parties that provide products or services to us or on our behalf and parties that collaborate with us in the provision of products or services to you. In addition, your personal information may be disclosed or transferred in the event of a change in ownership, a merger/acquisition or a joint venture, provided that such party is bound by appropriate agreements or obligations and required to use or disclose your personal information in a manner consistent with the use and disclosure provisions outlined in the Privacy Policy.
NOVA Chemicals relies on our employees to update their own personal information. Unless you advise NOVA Chemicals of these important changes, the company has no way of knowing about them.

**Our responsibilities**

- Protect the confidentiality of the personal data that you have access to and ensure it is used only for legitimate business purposes
- Collect or release personal information only when there is a legitimate business need and the collection or release has been properly authorized
- Understand the applicable laws and regulations that apply to personal data under your control
- Immediately report any unauthorized disclosure of personal data to your leader, HR Business Partner or Ethics & Compliance

To learn more, see our Privacy Policy.

**Promote a safe and healthy workplace**

“Goal ZERO starts with me!” Making safety our first priority will enable us to achieve our goal of ZERO incidents, injuries and illnesses as we continue on our Journey to #1.

We are responsible for the well-being of our coworkers and communities, and we are focused on taking all reasonable and legally required precautions to maintain a workplace that is safe.

Our health and safety requirements are absolute. We are all expected to identify risks and to put forth a plan that mitigates these hazards and protects ourselves, our coworkers, customers and business partners.

Our workplace is alcohol- and drug-free. We all have an obligation to report to work free from the influence of any substance that could impair our ability to perform our jobs.

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**The Code in action**

**Q:** In my department, we handle customer information as well as employee information. My leader said that it is more important to protect customer information, since that information represents competitive information. Is my leader right?

**A:** No. Customer information is important for the reasons given by your leader, but we must also protect employee information. Data privacy laws concerning employee information are becoming stricter in the United States, Canada and Europe.
NOVA Chemicals is committed to providing a secure work environment. That commitment is jeopardized when any employee is threatened, intimidated or physically assaulted in the course of his or her employment. Therefore, to best protect our employees and persons visiting our work sites, NOVA Chemicals has enacted a violence-free workplace policy that:

- prohibits any form of workplace violence, whether toward an employee, toward another person or toward property; and
- prohibits threats toward and intimidation of employees and other persons.

We reject all forms of verbal intimidation and physical violence in the workplace. We recognize our shared responsibility to maintain a secure, trusting and supportive work environment.

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 or unsafe condition of which we become aware 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

To learn more, see our Anti-Harassment Policy, Violence-Free Workplace Policy, Responsible Care and Sustainability Policy and Alcohol & Drug Policy.
We uphold our responsibilities to the company when we:
Responsibly prepare and distribute business communications

At NOVA Chemicals, we strive to promote a work environment that fosters mutual respect, openness and individual 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 environment, it is increasingly likely that our communications may, at some point, become public. In the pressure of everyday business, it is easy to forget that even communications you intend to keep private may be disclosed and can have a dramatic effect on NOVA Chemicals’ reputation.

Business communications are any verbal or written messages or materials created by you, including:

- Voice messages
- Phone calls
- Face-to-face conversations
- Email messages
- Text messages
- Social media posts
- Presentations
- Reports
- Notes
- Spreadsheets
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 you are discussing.
- Preface any nonfactual information in communications by indicating that it is an opinion, prediction or speculation to prevent your readers or listeners from mistaking your statements as facts.
- Remember sarcasm and insults do nothing to clarify your message; they only clutter the core points you are trying to convey and can confuse or even offend the person you are writing or talking to.
- Avoid making generalizations or exaggerations in your communications.
- Be aware of misusing inclusive terms such as all and always or exclusive terms such as none and never.

To learn more, see our Responsible Business Communications Policy, Communication and Disclosure Policy, Litigation Policy, and Records Management Policy.

The Code in action

Q: Are internal company communications confidential?

A: Not necessarily. There is no guarantee that internal communications will stay internal. Unless protected by privilege, internal communications, especially documents, are subject to public release for lawsuits and regulatory requests (although proprietary data may sometimes be protected). In addition, internal communications can be inadvertently disclosed or occasionally purposely leaked to outsiders. Keeping sensitive documents confidential is part of responsible communication.

Q: If I carefully direct all my communications, why should I be concerned with unintended recipients?

A: Where your communications ultimately end up is largely out of your control. Even if you are careful in directing your communications, others may get your message through corporate espionage, eavesdropping, whistleblowing, lawsuits, regulatory requirements or inquiries, the news media, competitors, special interest groups or other ways. Also, it is easy to misdirect messages in these days of instant, and almost automatic, email.
Avoid conflicts of interest

Taking a responsible approach to business is how we build trust with others and sustain our reputation — both as a company and as individuals. As part of a responsible approach, we handle conflicts of interest properly.

We avoid actual, potential and perceived conflicts of interest by learning to recognize them, by being transparent and by taking action. Whenever we find ourselves in situations that appear to be a conflict, we disclose the situation as soon as possible.

A conflict of interest occurs when your judgment or decision-making is influenced by outside interests, either in appearance or reality.

It is not possible to list all of the potential conflicts, but they may include such things as:

- having a financial interest in a third party, competitor, supplier, affiliate or customer of NOVA Chemicals or in an outside concern where you could personally gain from or affect NOVA Chemicals’ business;
- entering into business arrangements on behalf of NOVA Chemicals with a family member or someone with whom you have a personal relationship or if any such person is employed by an entity seeking to do or doing business with NOVA Chemicals;
- making decisions or being in a position to have direct authority or influence over the hiring, promotion or salary decisions of a family member or someone with whom you have a personal relationship;
- being in a relationship, personal or otherwise, that may create a conflict of interest with NOVA Chemicals responsibilities or compromise NOVA Chemicals interests; and
- taking second jobs which may interfere with our duties or performance at NOVA Chemicals.

NOVA Chemicals employees must immediately disclose if they are participating in the review, selection, award and/or administration of a contract where they may have a conflict of interest with the supplier considered.

The Code in action

Q: I recently made a personal acquisition of a business that is a supplier to NOVA Chemicals, and I’m concerned about a potential conflict of interest. To avoid the conflict of interest, will it be sufficient for me to place my interest in the business in my brother’s name?

A: No. First of all, if you are directly benefiting from the business interest, then the conflict clearly exists no matter whose name the interest is placed in. Second, the conflict would extend to ownership interests by immediate family members, so the conflict of interest would still exist and must be disclosed.

Q: My relative wants to work at our company and has applied for a job here. I’m a part of the hiring process. I know he’d do a good job, and I want to help him out. Do I have to disclose that I know him?

A: Yes, you must disclose your relationship. There’s more: you must not participate in the hiring process involving your relative. It would be a serious conflict of interest for you to be involved in hiring — or not hiring — a relative or a friend.
Disclose and discuss outside directorships

Occasionally, some of us are asked to be a board member or assume a leadership role with other for-profit or non-profit companies; with industry, trade or technical associations; or with professional groups. These organizations, associations and groups often pursue constructive and legitimate goals that NOVA Chemicals supports. In some of these situations, a conflict of interest can occur and even raise legal issues, such as competition law or lobbying law concerns. For these reasons, we should always disclose to our leader and Ethics & Compliance any potential participation as an officer or director of another organization before accepting the opportunity. Together, we can discuss the situation and Ethics & Compliance can advise on whether a conflict may exist and, if so, how to manage it.

Our participation in outside organizations should never involve the use of NOVA Chemicals assets and resources or involve the use of proprietary or confidential knowledge or information gained as an employee of NOVA Chemicals for the benefit of the outside entity.

Our responsibilities

- Recognize actual or potential conflicts before they become prohibited conflicts
- Consider how a situation might look to a third party
- Cooperate with leaders and Ethics & Compliance to implement fair solutions
- Disclose and obtain written consent from Ethics & Compliance before doing business with companies in which we have a financial interest
- Comply with the disclosure requirements set forth in the Conflicts of Interest Policy

To enable NOVA Chemicals to manage situations that may arise in respect to business and personal conflicts, you are required to disclose conflicts of interest to Ethics & Compliance throughout the year, as and when they arise, by completing the conflict of interest disclosure form. Also, as part of the annual Code acknowledgement process you will be required to submit a declaration confirming that you have disclosed all conflicts of interest.

If you find yourself in a situation that might be seen as a conflict of interest, disclose the matter to Ethics & Compliance as soon as possible. To learn more, see our Conflicts of Interest Policy.

The Code in action

Q: I have been asked to serve on the board of directors for a local charity. I read that this could be a conflict of interest. Is that correct, and if so, what must I do?

A: Correct. You have already taken the first step in resolving the situation, which is to disclose it. The reason for disclosing this type of activity is to maintain your credibility by obtaining an external review and approval of the activity from Ethics & Compliance. As long as there is no direct relationship between the charity and NOVA Chemicals that could cause a conflict and the associated time commitment would not impact your job responsibilities, there should be no problem with you serving on the board.

Q: At the end of a long project, a contractor offered me some part-time work at his company. The work involves services that NOVA Chemicals does not provide. Is this a conflict?

A: Yes, it is. Entering into a business relationship with this vendor would at the very least give the appearance that you may not be able to give non-preferential treatment to this vendor in future dealings with NOVA Chemicals, so you must disclose this offer with your leader and Ethics & Compliance.
Avoid bribery and corruption

Bribery and corruption are illegal worldwide, though the scope of the laws vary. Bribery and corruption may take many forms: from the obvious (e.g., cash) to the subtle (e.g., employment, commissions, hospitality, gifts, entertainment, etc.). Subtle forms of bribery and corruption also often sit in grey areas. For instance, not every job offer is a bribe, and not every commission is a corrupt payment.

Violations of anti-bribery and corruption laws, such as the U.S. Foreign Corrupt Practices Act (“FCPA”), the Canadian Corruption of Foreign Public Officials Act and the U.K. Bribery Act 2010 can result in severe legal penalties for NOVA Chemicals and/or any employee involved in the irregular activity, including but not limited to fines and imprisonment. Such violations can also result in the suspension or termination of NOVA Chemicals’ customer and supplier relationships and government licensures and can negatively impact other critical operational, corporate, and reputational assets.

Business courtesies

Business courtesies such as gifts, entertainment or meals can create goodwill and expand business relationships. In principle, there is nothing wrong with giving or receiving business courtesies of a nominal value when it is appropriate. Reasonable and limited expenditure for gifts, entertainment or meals offered in accordance with NOVA Chemicals policies and procedures may be acceptable but must always be treated judiciously so as not to appear to be an improper payment.

Government officials

Business courtesies involving government officials may be permitted only if they are legal and there is clearly no expectation that the gift, entertainment or meal will lead to a government official improperly using his or her position to help NOVA Chemicals or anyone else obtain a commercial or business advantage.
Disclose and discuss improper payments

An improper payment includes payments to anyone, even legitimate payments, if there is any reason to believe that the recipient of the payment will use it to act improperly or for corrupt activity, e.g. bribery, offers to bribe, kickbacks, excessive business courtesies, or willful ignorance.

Improper payments can sometimes be difficult to distinguish from legitimate expenditures; always err on the side of caution and, if there is any question, contact your leader or Ethics & Compliance in advance for guidance.

NOVA Chemicals strictly forbids all employees to directly or indirectly accept, offer, promise, authorize or make a payment or other transfer to anyone in an attempt to improperly gain any commercial or business advantage. This includes payments to anyone, even legitimate payments, if there is any reason to believe that the recipient of the payments will use them to act improperly or for corrupt activity.

**Government officials**

It is particularly important for employees to avoid improper payments to government officials and to governments or government-related entities. All payments, including for services, permits, license or other fees, and nominal amounts to expedite routine administrative functions (“facilitation payments”), are not permitted if paid to government officials, as they are prohibited under anti-corruption laws and the Code.

**Business partners**

Employees must take particular care to seek to prevent improper payments by business partners and to ensure their compliance with applicable anti-bribery and corruption laws. Such actions should include appropriate risk-based due diligence; contract provisions and/or certifications; appropriate ongoing monitoring of business partners; anti-bribery and corruption discussions with a business partner and/or periodic audit of business partner activity and expenditures as appropriate.

**Books and records**

Laws require that companies accurately reflect all payments of any value in their books and records.

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<th>The Code in action</th>
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<td><strong>Q:</strong> You want to discuss a contract renewal with a client, which is a state-owned enterprise of a Latin American country. You invite a company representative for dinner to discuss the matter, and the order includes a bottle of fine wine. Can you pay the bill?</td>
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<tr>
<td><strong>A:</strong> Yes. While the company representative is a foreign official as defined by the FCPA, paying for the meal is both legal and culturally appropriate. In this context, enjoying a fine wine at dinner would not be considered a lavish expense or misread as an attempt to gain undue influence. Remember, however, that you would need to complete the required gifts, entertainment and meals pre-approval form.</td>
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Pre-approval process

Pre-approval is required for gifts, entertainment and meals of any value that are offered, given to or received from a government entity or government official.

Pre-approval is required for gifts, entertainment or meals given to or received from a commercial entity having a value equal to or greater than $150 USD per person.

Where pre-approval is not practical (e.g. last-minute dinner invitation, time zone differences), timely completion and submission of the applicable approval form is required as soon as possible following receipt of, or the giving of, the gift, entertainment or meal.

Always use your common sense and good judgment and seek advice if you are unsure whether to obtain pre-approval.

Our responsibilities

- Never offer, give or accept an improper payment, e.g., a bribe, a kickback or anything of value directly or through a third party that attempts to gain business or to influence a business decision
- Watch for offers of extravagant or multiple business courtesies
- Report any suspicious situations regarding inappropriate payments immediately to Ethics & Compliance
- Avoid making any facilitating payments. Contact Ethics & Compliance if you are presented with what you suspect is a facilitating payment request or expectation
- Carefully select and monitor third parties who act on our behalf to ensure no improper payments are being made or received by them
- Read, understand, and comply with the pre-approval and registration instructions set forth in the Anti-Bribery & Corruption Policy

To learn more, see our Anti-Bribery & Corruption Policy.
Safeguard company assets and information

We are good stewards of the resources entrusted to us. We take proper care of NOVA Chemicals' assets and recordkeeping. Our information and communication systems and the electronic data they store, process or transmit are vital business assets. By being responsible for their integrity and security, we ensure the efficiency and 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 communication systems is governed by the Code, and misuse will be subject to disciplinary action, including termination of employment.

Like other aspects of our work, our recordkeeping is clear, open and honest. Our records are complete and accurate, allowing NOVA Chemicals to make responsible business decisions and provide truthful information in compliance with legal disclosures. "Records" include both physical documents such as paper, microfilm, DVDs, CDs and tapes as well as all computer data and information, especially emails.

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

Be mindful that any communication may be subject to review by third parties such as governmental agencies and others, especially during litigation. Every email, letter or written communication you prepare should be written as if it may be read by others and produced in a court of law.

As a general policy, NOVA Chemicals seeks to avoid litigation. At times, litigation avoidance is impossible. No person may respond to or otherwise address threatened or actual litigation without assistance from the Law department. In all matters involving threatened or actual litigation, the Law department will explore the facts, understand the legal issues, communicate with its business partners, assess the risk and provide the most appropriate, professional and ethical response.

Receipt of a threat of litigation against NOVA Chemicals by any person must be immediately delivered to the Law department. No one should discuss litigation outside of the company without first consulting the Law department.

What are assets?

Assets can be both tangible and intangible. They include:

- Physical assets such as land, facilities, vehicles, equipment and inventory
- Financial assets such as cash, receivables and investments, business records and accounts
- Proprietary information such as trade secrets, patents, copyrights and confidential business information
- Contract rights and licenses
- Digital data, including messages stored in or sent through our information communications systems
NOVA Chemicals records that are subject to litigation, government investigation or audit cannot be destroyed even when permitted by NOVA Chemicals’ Records Management Policy. In order to prevent these records from inadvertently being destroyed, a system of “holds” will be assigned to records subject to these legal constraints. Employees shall retain all relevant records until advised, in writing, that such records can be returned to their normal retention schedule.

**Our responsibilities**

- Never use NOVA Chemicals assets for personal reasons
- Never engage in fraud or deliberate errors in the preparation, recording or maintaining of correspondence, internal documents, financial records, statements or audits
- Write simply and directly; do not stray from the facts you are trying to communicate
- Do not forward emails or unnecessarily attach prior messages unless relevant to our communication
- Record all revenues and expenditures, including acquisitions and dispositions of assets, with accuracy
- Turn in complete records in a timely fashion, especially requests for reimbursement or NOVA Chemicals payment of expenditures, whether requested by our leader or regulators
- Retain and destroy records only according to the Classification and Retention Schedule (CARS) in our Records Management Policy
- Never dispose of any records that are expected to become the subject of litigation, legal hold, investigations or audits without the approval of Legal
- Never engage in fraud or deliberate errors in the preparation, recording or maintaining of financial records, statements or audits

To learn more, see our Anti-Corruption Policy, Controller’s Guide, Delegation of Authority and Contract Management Policy, Litigation Policy, Records Management Policy and Responsible Business Communications Policy.

**The Code in action**

**Q:** I received a note from Legal stating that a potential lawsuit may be filed against NOVA Chemicals by a customer of mine and telling me to save the documents. What should I do?

**A:** The note you received is known as a legal or litigation hold. Once you receive this message, you must not destroy any records such as handwritten or typed notes, emails, travel logs, phone logs or any documentation you have related to the customer. Legal will review your documents with you and will assist you in determining what to keep and what may be destroyed consistent with our records retention programs. Do not destroy anything without Legal’s approval.
Understand the delegation of authority

To ensure effective governance, NOVA Chemicals' board of directors has established a **Delegation of Authority and Contract Management Policy**. This policy gives authority to identified roles and band levels within the company to perform certain tasks, such as signing contracts or approving expenditures. It also creates certain controls to minimize 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 Delegation of Authority Policy
- Sign contracts or approve expenditures only if the subject of the agreement or the amount of the expenditure is within the authority we have been delegated by virtue of our job or band level
- Understand the difference between Signature Authority and Expenditure Authority, detailed in the Delegation of Authority Policy
- Discuss questions regarding our individual authority to act on behalf of the company with our leader
- Be aware that contracts/agreements may have liabilities associated with them that can change the level of signature authority

Our Delegation of Authority and supporting financial policies ensure internal controls and processes are in place across NOVA Chemicals.

To learn more, see our **Delegation of Authority and Contract Management Policy**, the **Payment Method Policy** and the **Controller's Guide**.

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**The Code in action**

**Q:** I am not in a leadership position, but I have been asked to approve an invoice seeking payment of US$10,000. Do I have the authority to do this?

**A:** Possibly. An individual employee’s expenditure authority is set forth in SAP and is determined by band level. Before approving this payment, you should check in SAP and review the Delegation of Authority and Contract Management Policy to be sure you have been delegated the authority to make this approval. As always, if in doubt, ask.

**Q:** I have been asked to sign a contract/agreement with a new service provider. The old contract was signed years ago by the person in my position at that time. Can I assume that I can sign the new contract?

**A:** No. You should not assume that signing authority has not changed in the years since the original agreement was signed. It is always best practice to check the **Delegation of Authority and Contract Management Policy** section on Obtaining Approval for Contracts to be sure that you have the proper signing authority.
NOVA Chemicals’ confidential information includes but is not limited to:

- Trade secrets and know-how
- Actual or potential patents, copyrights and trademarks
- Financial data
- Business ideas, processes, plans and proposals
- Capacity and production information
- Marketing or sales forecasts and strategies
- Customer information
- Price lists or formulas
- Business strategies
- Construction plans
- Supplier data
- Technology and research/development information
- Employee records

Protect confidential and proprietary information

Our business plans, trademarks, formulas, processes and other types of intellectual property are vitally important to helping 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 and highly damaging to both our customers and our company.

It is important to protect the intellectual property, know-how and confidential information of NOVA Chemicals and third parties that are in our possession. Failure to do so can subject the company and you to lawsuits, fines and other penalties.

When we use third-party equipment, hardware systems or software programs, we follow all licensing agreements restricting their use and duplication. We are expected to use sound judgment when handling copyright-protected work and to follow the guidelines set forth under NOVA Chemicals’ Copyright Compliance Policy.

We never misuse trade secrets, confidential information, unique ideas, inventions, creative works or trademarks, not only while an employee of NOVA Chemicals but also after 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
- Disclose information only to people with a legitimate business need to know to serve legitimate business purposes, and transfer the information securely
- Recognize and prevent the disclosure of confidential information to any third party outside of NOVA Chemicals, including family members, unless we have authorization to disclose it and the third party receiving the information has signed an appropriate Confidentiality or Non-Disclosure Agreement.
- Respect patents, trademarks or other intellectual property, and never infringe on them
• Use copyrighted material only after obtaining permission and in a manner that is consistent with our Copyright Compliance Policy

• Never discuss proprietary or confidential information in public places or anywhere a conversation might be overheard

• Never use confidential information for personal gain or for the gain of others outside NOVA Chemicals

• Remember our obligation to protect confidential information continues after we leave NOVA Chemicals

To learn more, see our Copyright Compliance Policy, Information Protection Policy, Responsible Business Communications Policy, Trademark Usage Policy and our Communication and Disclosure Policy. Also, carefully review the Employee Invention and Secrecy Agreement you signed when you joined NOVA Chemicals.

Follow company policy with media relations

We are responsible in our communications. We keep our customers, business partners and communities informed. We must ensure that the communications are accurate, timely and fully coordinated before release. When communicating about NOVA Chemicals with the media, we follow company policy and never communicate on behalf of an entity or person unless we are specifically designated to do so.

Our responsibilities

• Direct all media requests for information to the Corporate Communications department

• Never talk to any representative of the media about NOVA Chemicals or comment on NOVA Chemicals’ activity without prior approval from the Corporate Communications department

To learn more, see our Communication and Disclosure Policy.

The Code in action

Q: What do I do if I'm contacted by someone who wants to sell or license an idea, patent, domain name, design, process, methodology or other creation to NOVA Chemicals?

A: Immediately contact your leader or Ethics & Compliance. Do not enter into any agreements or substantive discussions until you have received specific guidance.

Q: What kinds of copyrights are associated with information on the Internet? Isn't all the information on the Internet considered public domain information?

A: Items found on the Internet are often copyright protected. Before copying and using any image, sound or written work from the Internet, familiarize yourself with the Copyright Compliance Policy and, if necessary, contact your leader or Ethics & Compliance for assistance. It is often very simple to obtain permission from the legal holder of the rights to the item we want to use.
Use social media responsibly

When engaging with social media, we adhere to our values and think before we post. We follow NOVA Chemicals’ rules and guidelines for responsibly using social media to generate interest in NOVA’s recruitment, products and services and to create business opportunities for NOVA.

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
- Refrain from posting offensive, derogatory and other inappropriate verbal or visual material that could damage our own reputation and that of the company
- Prevent time spent on social media from interfering with work commitments
- Never speak as a NOVA Chemicals representative without authorization
- Never disclose proprietary company information or personal information about others
- Never refer to or post pictures of company employees, customers, suppliers or business partners without their approval

To learn more, see our Social Media Policy, Social Media Guidelines, Communication and Disclosure Policy and our Responsible Business Communications Policy.

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

The Code in action

Q: I write content and maintain a social media page about one of our newest products. A major customer of ours has responded favorably to this item, not only buying it in large volume but also carrying and heavily promoting the entire line. I’d like to communicate this positive event to the public. Is this okay?

A: Since information about a customer’s sales activities is confidential, you should not make any statements without obtaining approval. Without specifically mentioning its sales, perhaps the customer would be willing to give a product testimonial. Before you communicate to the public, always contact NOVA Chemicals’ Communications department.
Engage in political activities responsibly

When subjects of legitimate interest and importance to NOVA Chemicals business arise on the political scene, it is important that the company speak with one voice through authorized channels.

Lobbying public office holders is a legitimate activity, but it is regulated by federal and provincial/state laws and regulations. Lobbying on behalf of the company is carefully managed through the NOVA Chemicals Government Relations department, and prior approval from this department is required before making any contact with governmental officials.

On a personal level, we encourage your participation in the political process. We all have the right to engage in political activities. But when we do, we also must make sure our personal views and donations are clearly distinguished from those of the company. All personal statements or actions that may appear to be from the company must be avoided or, if necessary, prior approval from NOVA Chemicals’ Government Relations department must be obtained.

Our responsibilities

- Comply with all laws regulating the company’s participation in politics, including political contributions
- Make it clear when we engage in political activity that we are speaking on our own behalf and not the company’s
- Never make donations on the company’s behalf
- Never use company time, property or facilities for any personal political activity

To learn more, see our Lobbying Guidelines and Political Donations Policy (Canada).
The Code in action

**Q:** Do I have to refund the value of bonuses or awards granted under “frequent flier miles” or other noncash loyalty and points programs?

**A:** No. Personal participation in a rewards program to earn points or other benefits is acceptable; however, membership in these programs must not be used as criteria when making business travel decisions. It is always expected that NOVA Chemicals’ preferred vendors are used when booking travel.

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**Incur and reimburse expenses responsibly**

Employees are expected to 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 expenditures.

Any commitments and expenditures we make must also have a reasonable business justification, be within our approval and expenditure limits, be supported by receipts or other documentation, and be approved in accordance with all applicable policies and procedures.

**Our responsibilities**

- Use credit and travel cards provided by the company for business purposes only
- Return unused airline tickets to the company’s travel service provider and refund the value to NOVA Chemicals as a credit on our expense reports
- Always refund the company for any credits or refunds we receive for goods and services charged to company-issued credit and travel cards
- Timely submit all supporting documentation for expenditures
- Discuss approvals with your leader where appropriate

To learn more, see our Travel, Expenses and Credit Card Policy.
We uphold our responsibilities in the marketplace when we:
Examples of competition violations

Antitrust and unfair competition laws prohibit agreements that limit or restrain trade such as price fixing, bid rigging, division of markets, predatory pricing or agreements on resale prices.

Unfair competitive actions can include such things as making false statements about competitors, misusing a competitor’s trade secrets, providing a competitor with information about pricing or territories, restricting a competitor’s source of supply or inducing a supplier to break contracts with a competitor.

Careless discussions at trade association meetings or events involving competitors or inappropriate statements in marketing materials can cause serious problems.

Many jurisdictions have laws that require prior clearance of mergers, acquisitions, joint ventures or other similar transactions, especially if competitors are involved.

Follow competition laws

We are committed to becoming a recognized leader in our markets, but we will never sacrifice our values in pursuit of commercial success. 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, complex, often reach across borders and carry severe penalties for companies and individuals who do not comply with them.

We compete on the basis of price, quality and service. We do not engage in deception, misrepresentation or other forms of unfair dealing. Because even the appearance of improper agreements with competitors can harm our reputation and bring risk of legal action, we are careful to always remain transparent and straightforward as we compete.

Our responsibilities

- Conduct all relations with competitors as if they were completely in public view
- Treat business partners fairly and in accordance with the law
- Understand and comply with the NOVA Chemicals Antitrust Law Compliance Policy
- Report inappropriate discussions immediately to our leader or Ethics & Compliance
- Never discuss details of our business with competitors
- Never have discussions or reach agreements with competitors, customers or suppliers about fixing prices, dividing markets, rigging bids or other actions that limit competition

To learn more, see our Antitrust Law Compliance Policy.

The Code in action

Q: At a trade association meeting, I was approached by a competitor who suggested it might help both our companies if we shared pricing strategy. I excused myself immediately. Was that the right step to take?

A: Yes. Removing yourself from the situation was the right thing to do. You minimized the risk that others might see the two of you together and think you were discussing price fixing or some other inappropriate activity. Make a note of all the facts and report the incident to Ethics & Compliance promptly.

Examples of competition violations

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Many jurisdictions have laws that require prior clearance of mergers, acquisitions, joint ventures or other similar transactions, especially if competitors are involved.
Gather competitive intelligence legally and ethically

We are committed to staying informed about our competitors and their potential effects on the market as this enables us to make strategic business decisions. However, we gather and use competitive intelligence only legally and ethically.

Many of the countries where we do business have laws making it illegal to use information obtained from another company without that company’s permission. Regardless of the law, we always protect our competitors’ proprietary information from misuse. We treat it as we would want them to treat ours — fairly.

Competitor information that we may seek and use can include published articles, public records, government filings, Internet sites, market analysis and purchased reports.

Theft, misrepresentation, eavesdropping, inducement and similar means of gathering information are never acceptable. Information we would not use could include emails, overheard conversations, accidental disclosures and data from lost or misplaced devices.

Our responsibilities

- Gather only publicly available information about competitors
- Respect requests for confidentiality from our business partners
- Protect third-party confidential information in the same way we protect our own
- Use only competitive intelligence that has been gathered legally and ethically
- Never use unethical means such as theft, spying or bribery to obtain information
- Never seek confidential information from competitors, or anyone else, without their consent

The Code in action

Q: A friend who works for a NOVA Chemicals competitor sent me an email that appears to have been meant for someone else. The email is marked confidential and contains pricing information. How should I handle this?

A: Immediately notify the Chief Compliance Officer. After speaking with the Chief Compliance Officer, delete the email and do not use the information contained in it. Let the sender of the message know how you responded. This is what your friend and the company expect you to do.
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.

We never knowingly facilitate money laundering, terrorist financing or other illegal activities. Money laundering occurs when funds generated from crimes are moved through legitimate businesses to hide their criminal origins. Terrorist financing can also be hidden through seemingly legitimate business practices. We are vigilant in our efforts to prevent the inadvertent use of NOVA Chemicals activities for illegal purposes.

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

Our responsibilities

- Exercise good judgment when dealing with customers or business partners
- Conduct the due diligence necessary to ensure that activities and transactions with our customers, suppliers and business partners are reputable and responsible
- Be watchful for any payments that look irregular or for customers who appear to lack integrity in their operations
- Report any suspicious transactions or incidents of money laundering to the Chief Compliance Officer

To learn more, see our Anti-Corruption Policy.

The Code in action

Q: In my efforts to recognize illegal actions, what kind of activities might be considered suspicious or raise a red flag?

A: They include but are not limited to:

- Cash payments
- Payments from unusual funding sources
- Arrangements involving transfers of funds to or from entities not related to the transaction or customer
- Deals that are unusually complex without a real business purpose
- Attempts to avoid recordkeeping or reporting requirements
- Customers who overpay for goods or services, and then request a refund
- Any customer, supplier, agent or partner who provides incomplete or suspicious information
- Orders and purchases that are not consistent with a customer’s normal business activities
- Funds paid from or to unusual sources, or from or to countries not normally associated with the customer
Avoid insider trading

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

To learn more, see our Insider Trading Policy.

Follow trade controls and immigration laws

Trade controls

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

Countries where we operate impose trade restrictions for a variety of reasons. Trade controls can range from complete embargoes, to bans on dealing with suspected terrorist entities, to restrictions on the export or disclosure of certain types of products or information. Some of these laws also impose reporting, licensing and other requirements when certain types of products, such as hazardous chemicals, are imported or exported.

Remember that an export or import can be made electronically in addition to traditional shipping methods. An export or import can also be made during discussions or visits to a facility.

The Code in action

Q: How do I know if the information I have about a company is “material”?

A: Under the law, if there is a substantial likelihood that a reasonable investor would consider the information important in making a decision about trading a company’s security, then that information is considered material. Examples of material, nonpublic information include:

- Earnings reports or estimates
- Unpublished financial information
- Pending acquisitions or sales of business units
- Major changes in management or strategies
- Significant new contracts, partnerships or products
- Decisions to expand or reduce operations
Sometimes violations occur inadvertently through miscommunications or oversights. When dealing with trade controls, it is crucial that we keep our licenses and documentation up to date to avoid costly fines and penalties. It is important to review our Trade Restriction Guidelines before entering into a transaction. These guidelines are intended to provide guidance to NOVA Chemicals personnel who are about to initiate an international sale, purchase transaction or technology exchange. They are designed to sensitize you to the situations in which trade restrictions may apply to the business activities that you are involved in, and to tell you how to seek guidance in such situations.

If you have questions regarding trade control compliance, consult with Ethics & Compliance.

**Our responsibilities**

- Consult with our leaders and comply with our Trade Restriction Guidelines before making decisions to export goods, services, software or technology
- Report any customs payments that look suspicious or do not occur in the ordinary course of business
- Know our customers and suppliers — who they are, what they do, where they are based and how they will use our goods or technology
- Ask for help if we have questions about our compliance obligations in these areas

To learn more, reference our Trade Restrictions Guidelines.

**Immigration laws**

Immigration laws apply whenever we perform work for NOVA Chemicals in a country other than our home country or 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, and in some cases, require certification that we are in compliance with trade controls regarding the transfer of certain goods, information and technologies. Before crossing any border to meet colleagues in another location or to perform work, you should contact the Chief Compliance Officer to ensure all immigration requirements are met.
We uphold our responsibilities to the community when we:
Prioritize sustainability

At NOVA Chemicals we believe a sustainable business is a profitable and socially responsible business. We believe sustainable business practices can actually drive profits. When we live our values, we succeed. When we protect each other and our communities, we strengthen ourselves. When we put our environment first, we become leaders.

Protect the environment: Responsible Care®

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 customers and the public. Our standards ensure that our programs and services meet or exceed applicable laws and industry codes of practice, while also promoting sustainable economic, social and environmental practices.

NOVA Chemicals upholds the principles of Responsible Care. These principles guide us toward our goal of a sustainable future for all. They help us strive daily to find innovative solutions that reduce our global footprint.

Our responsibilities

- Practice and encourage safe work habits and environmental responsibility
- Comply with all applicable environmental laws and company policies
- Adhere to requirements of environmental permits
- Immediately report environmental incidents
- Provide only honest and accurate information to the government on any environmental monitoring, sampling or performance report

To learn more, see our Responsible Care and Sustainability Policy and Responsible Care Standards and Guidelines.
Contribute to community well-being: Good ambassadorship

As a Responsible Care company, NOVA Chemicals recognizes the need to be accountable and responsive to the public and especially to our local communities.

The communities where we work are important stakeholders, and NOVA Chemicals is committed to being a good corporate citizen by caring for the environment and supporting community service. We invest in the well-being of our communities by lending a hand to organizations dedicated to making a difference and improving the overall quality of life. The United Way is NOVA Chemicals’ charity of choice and the principal way we contribute to community service needs in North America.

Our responsibilities

- Act honestly and ethically with coworkers, suppliers, customers, government representatives, community members, competitors and security holders
- Verify that all company charitable contributions are in accordance with applicable laws and regulations
- Carry out our company-sponsored community service efforts with the same safety principles we use in our daily work
- Obtain proper prior approval before donating company funds or making contributions in the company’s name

To learn more, see our Community Investment Principles.

The Code in action

Q: Does the company place any limits on our community involvement as individuals?

A: NOVA Chemicals hopes every employee gets involved in the community, as long as:

- You don’t pressure others to contribute to charitable organizations
- You don’t act as a company representative at community events without proper approval
- When your community service activity or event is not endorsed by NOVA Chemicals, you ensure that it happens on your own time, using your own resources
- You apply the same safety principles that you use in your job when carrying out company-sponsored community service activities

To learn more, see our Community Investment Principles.
Uphold human rights

We stand by the principle that everyone has the right to be treated with dignity and respect. We recognize and respect human rights, and we expect our partners to do the same.

We protect and support the communities where we work by maintaining safe working conditions in which all employees are given an appropriate number of working hours and fair compensation for their work. The use of child and forced labor of any kind is illegal and inhumane.

Human trafficking, or modern slavery, is a criminal industry that denies people their freedom and human rights. We are against human trafficking or 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 NOVA Chemicals has proper working conditions, hours and compensation
- Never use child or forced labor
- Report any signs of child or forced labor
- Stay alert to signs of human trafficking or slavery
- Speak up if we see signs of human trafficking or slavery or suspect any other human rights violation

All people are entitled to human rights. We commit to upholding human rights throughout our communities with integrity and solidarity. As a company, we prioritize each other’s health, safety and security.

If you see or suspect human rights violations, contact the Ethics Line immediately.
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NOVA Chemicals
Corporation
Head Office
1000 Seventh Avenue, S.W.
P.O. Box 2518
Calgary, Alberta, Canada T2P 5C6
Phone: 403.750.3600